



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**DATE:** February 24, 2015  
**TO:** Riyad Ghannam, Architect  
**FROM:** Devyani Jain, Planning Department  
**RE:** PPA Case No. 2014-002181PPA for 2670 Geary Boulevard

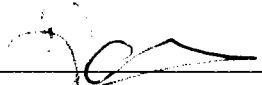
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Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Susan Mickelsen, at (415) 575-9039 or [susan.mickelsen@sfgov.org](mailto:susan.mickelsen@sfgov.org), to answer any questions you may have, or to schedule a follow-up meeting.

  
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Devyani Jain, Senior Planner





# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Project Assessment

*Date:* February 24, 2014  
*Case No.:* **2014-002181PPA**  
*Project Address:* 2670 Geary Boulevard  
*Block/Lot:* 1071/003  
*Zoning:* NC-3 (Neighborhood Commercial District, Moderate-Scale)  
80-D  
*Project Sponsor:* SoMa Development Partners  
760-214-8743  
*Project Contact:* Riyad Ghannam, Architect, 415-699-3640  
*Staff Contact:* Susan Mickelsen – (415) 575-9039  
susan.mickelsen@sfgov.org

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### DISCLAIMERS:

Please be advised that this determination does not constitute an application for development with the Planning Department. It also does not represent a complete review of the proposed project, a project approval of any kind, or in any way supersede any required Planning Department approvals listed below. The Planning Department may provide additional comments regarding the proposed project once the required applications listed below are submitted. While some approvals are granted by the Planning Department, some are at the discretion of other bodies, such as the Planning Commission or Historic Preservation Commission. Additionally, it is likely that the project will require approvals from other City agencies such as the Department of Building Inspection, Department of Public Works, Department of Public Health, San Francisco Public Utilities Commission, and others. The information included herein is based on plans and information provided for this assessment and the Planning Code, General Plan, Planning Department policies, and local/state/federal regulations as of the date of this document, all of which are subject to change.

### PROJECT DESCRIPTION:

The project site is located at 2670 Geary Boulevard on the northwest corner of the intersection of Geary Boulevard and Masonic Avenue on the block bounded by Masonic Avenue to the east, Geary Boulevard to the south, Collins Street to the west and Euclid Avenue to the north. The project lot is 12,684 square feet (sf) and currently contains a 3,879 sf retail building (Lucky Penny coffee shop) and 20-space surface parking lot. The proposal is to demolish the existing building and parking lot and construct a 7-story, 80-foot tall mixed-use residential, office, and retail building. The proposed new building would include three stories of residential use (26,000 sf) with 21 (two- to four-bedroom) dwelling units, three stories or approximately 35,000 sf of office space, approximately 11,000 sf of ground-floor commercial space and two levels of below-grade parking. The approximate 28,000 sf parking garage would include 68 vehicle parking spaces and approximately 40 bicycle parking spaces with primary access off Masonic Avenue. One on-site commercial loading space is proposed with access off Geary Boulevard.

**ENVIRONMENTAL REVIEW:**

In compliance with the California Environmental Quality Act (CEQA), the environmental review process must be completed before any project approval may be granted. This review may be done in conjunction with the required approvals listed below. In order to begin formal environmental review, please submit an **Environmental Evaluation Application (EEA)** for the full scope of the project. Environmental Evaluation Applications are available in the Planning Department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at [www.sfplanning.org](http://www.sfplanning.org) under the "Publications" tab. See "Environmental Applications" on page 2 of the current Fee Schedule for calculation of environmental application fees.<sup>1</sup> **Note that until an entitlement application is submitted to the Current Planning Division, only the proposed Project Description will be reviewed by the assigned environmental coordinator.**

The following issues would be investigated as part of the environmental review process:

1. **Historic Resource Evaluation (HRE).** Alteration or demolition of a Category C property (not an individual historic resource) and the project is not located in an eligible or identified historic district. The existing building on the project site is less than 45 years of age and/or was previously evaluated in a historical resources survey and found ineligible for national, state, or local listing. Thus, the proposed project is not subject to review by the Department's Historic Preservation staff; no additional analysis of historic architectural resources is required.
2. **Archeological Resources.** Project implementation would entail soil-disturbing activities up to 32-feet deep associated with building and garage construction, including excavation to support the drilled-pier foundation type. Based on this, the project would require a Preliminary Archeological Review (PAR), which would be conducted in-house by the Planning Department Archeologist. The PAR would determine what type of soils disturbance/modification would result from the project, such as excavation, installation of foundations, soils improvement, etc. Any available geotechnical report or Phase II Environmental Site Assessment prepared for the project site should be submitted with the EE Application and would be reviewed as part of the archeological review for this project. In addition, it would also be determined if the project site is in an area that is archeologically sensitive. The result of this review would be provided in a memorandum to the environmental planner assigned to the project. If it is found that the project has the potential to affect an archeological resource, the PAR memorandum would identify any additional measures to be implemented. Such actions may include application of appropriate archeological mitigation measures and/or requiring additional archeological studies as part of the environmental evaluation. If an additional archeological study is required, it must be prepared by a qualified archeological consultant. The qualified consultant must be selected from a list of three archeological consultants from the Planning Department's archeological resources consultant pool provided by the Planning Department during the environmental review process. The Planning Department Archeologist will be informed by the geotechnical study of the project site's subsurface geological conditions (see Item 13, Geology, below).

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<sup>1</sup> San Francisco Planning Department. *Schedule for Application Fees*. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=513>

3. **Transportation Study.** Based on the PPA submittal and the Planning Department's Preliminary Transportation Consultation/Preliminary Transportation Study Determination Request dated December 17, 2014, a transportation study is not likely required. However, an official determination will be made subsequent to submittal of the Environmental Evaluation Application (EEA). Planning Department staff have the following notes/recommendations after reviewing the PPA plans submitted:
- a. Plans submitted with the EE application should show dimensions of proposed curb cuts on Masonic Avenue and Geary Boulevard.
  - b. Clarify how bicycle parking is accessed and recommend ground-floor for easier access.
  - c. Submit the specifications sheet for the proposed vehicle elevator.
  - d. Recommend residential and office Transportation Demand Management (TDM) measures to reduce single-occupancy vehicle trips.
  - e. Coordinate with San Francisco Municipal Transportation Agency (SFMTA) on the potential relocation of the overhead wire pole that is located directly in front of the proposed loading area/driveway, and on the potential effects of construction on the nearby lamppost overhead wire tie-in.
4. **Air Quality (AQ) Analysis.** The proposed project's 21 dwelling units, 35,000 sf office, and 11,000 sf retail is below the Bay Area Air Quality Management District's (BAAQMD) construction and operation screening levels for criteria air pollutants.<sup>2</sup> Therefore, an analysis of the project's criterial air pollutant emissions is not likely to be required. However, detailed information related to cubic yards of excavation should be provided as part of the EE application.

The project site is not located within an Air Pollutant Exposure Zone, as mapped and defined by Health Code, Article 38. The Air Pollutant Exposure Zone identifies areas with poor air quality based on an inventory and modeling assessment of air pollution, exposures, and health vulnerability from mobile, stationary, and area source emissions within San Francisco. Given the project site is not within an Air Pollutant Exposure Zone, additional measures or analysis related to local health risks are not likely to be required. However, if the project would include new sources of toxic air contaminants including, but not limited to emissions from: diesel generators or boilers, or any other stationary sources, the project would result in toxic air contaminants that may affect both on-site and off-site sensitive receptors. Detailed information related to any proposed stationary sources shall be provided with the EEA.

In addition, project-related demolition, excavation, grading and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. To reduce construction dust impacts, the San Francisco Board of Supervisors approved the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI). Pursuant to the Construction Dust Ordinance, the proposed project would be required to comply with applicable dust control requirements outlined in the ordinance.

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<sup>2</sup> BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3.

5. **Greenhouse Gases.** *The City and County of San Francisco's Strategies to Address Greenhouse Gas Emissions* presents a comprehensive assessment of policies, programs, and ordinances that represents San Francisco's Qualified Greenhouse Gas (GHG) Reduction Strategy. Projects that are consistent with San Francisco's Qualified GHG Reduction Strategy would result in less-than-significant impacts from GHG emissions. In order to facilitate a determination of compliance with San Francisco's GHG reduction strategy, the Planning Department has prepared a Greenhouse Gas Analysis Compliance Checklist. The project sponsor will be required to submit a completed checklist, which can be found at this link <http://www.sf-planning.org/index.aspx?page=1886>, as part of the environmental review process. Projects that do not comply with an ordinance or regulation may be determined to be inconsistent with the Greenhouse Gas Reduction Strategy.
6. **Hazardous Materials.** The proposed project includes excavation up to 31'9", and the project site is located adjacent to a site (2696 Geary) with suspected soil and/or groundwater contamination. Therefore, the project may be subject to Article 22A of the Health Code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, soil and/or groundwater sampling and analysis, as well as remediation of any site contamination, may be required. These steps are required to be completed prior to the issuance of any building permit.

DPH requires that projects subject to the Maher Ordinance complete a Maher Application, available at: <http://www.sfdph.org/dph/EH/HazWaste/hazWasteSiteMitigation.asp>. Fees for DPH review and oversight of projects subject to the ordinance would apply. Please refer to DPH's fee schedule, available at: <http://www.sfdph.org/dph/EH/Fees.asp#haz>. Please provide additional information regarding the proposed excavation as well as a copy of the Phase I ESA with the Environmental Evaluation Application.

7. **Serpentine Soils.** Based upon mapping conducted by the U.S. Geological Survey (USGS) the project site is adjacent to an area underlain by serpentine rock.<sup>3</sup> Project construction activities could release serpentinite into the atmosphere. Serpentinite commonly contains naturally occurring chrysotile asbestos (NOA) or tremolite-actinolite, a fibrous mineral that can be hazardous to human health if airborne emissions are inhaled. In the absence of proper controls, NOA could become airborne during excavation and handling of excavated materials. On-site workers and the public could be exposed to airborne asbestos unless appropriate control measures are implemented. To address health concerns from exposure to NOA, ARB enacted an Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations in July 2001. The requirements established by the Asbestos ATCM are contained in California Code of Regulations

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<sup>3</sup> Planning Department, GIS Layer, "Areas Affected by Serpentine Rocks." Created February 25, 2010 from United States Geological Survey and San Francisco Department of Public Health data.

(CCR) Title 17, Section 93105.4 and are enforced by the Bay Area Air Quality Management District (BAAQMD). The proposed project would be required to comply with the requirements of the Asbestos ATCM, which include measures to control fugitive dust from construction activities, in addition to the requirements of the Construction Dust Control Ordinance discussed above.

8. **Noise.** The Planning Department's noise maps indicate that the proposed project is located on a site where existing ambient noise levels on surrounding streets are at, or exceed 75 decibels. The project involves the siting of new noise-sensitive uses (e.g., residential uses) and therefore requires an acoustical analysis demonstrating that the building will meet Title 24 noise insulation standards. This analysis shall include at least one 24-hour noise measurement (with maximum noise level readings taken at least every 15 minutes). The analysis must be prepared by persons qualified in acoustical analysis and/or engineering and shall demonstrate with reasonable certainty that Title 24 noise insulation standards, where applicable, can be met, and that there are no particular circumstances about the project site that warrant heightened concern about noise levels in the vicinity. To the maximum extent feasible open space provided as per the Planning Code should be protected from existing ambient noise levels that could prove annoying or disruptive to users of the open space.
9. **Shadow Study.** Please refer to "Shadow Analysis" section below.
10. **Wind Study.** The proposed project would involve construction of a building approximately 80-feet in height. The project therefore requires an initial review by a wind consultant, including a recommendation as to whether a wind tunnel analysis is needed. The consultant would be required to prepare a proposed scope of work for review and approval by the Environmental Planning case manager prior to preparing the required analysis.
11. **Stormwater.** The proposed project would result in a ground surface disturbance of over 5,000 sf in area and is therefore subject to San Francisco's stormwater management requirements as outlined in the Stormwater Management Ordinance and the corresponding San Francisco Public Utilities Commission (SFPUC) Stormwater Design Guidelines (Guidelines). Projects that trigger the stormwater management requirements must prepare a Stormwater Control Plan demonstrating project adherence to the performance measures outlined in the Guidelines including: (a) reduction in *total volume* and *peak flow rate* of stormwater for areas in combined sewer systems OR (b) *stormwater treatment* for areas in separate sewer systems. Responsibility for review and approval of the Stormwater Control Plan is with the SFPUC, Wastewater Enterprise, Urban Watershed Management Program. Without SFPUC approval of a Stormwater Control Plan, no site or building permits can be issued. The Guidelines also require a signed maintenance agreement to ensure proper care of the necessary stormwater controls. The project's environmental evaluation should generally assess how and where the implementation of necessary stormwater controls would reduce the potential negative impacts of stormwater runoff. To view the Stormwater Management Ordinance, the Stormwater Design Guidelines, or download instructions for the Stormwater Control Plan, go to <http://sfwater.org/sdg>.

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<sup>4</sup> California Air Resources Board, Regulatory Advisory, Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations, July 29, 2002.

12. **Tree Planting and Removal.** The Department of Public Works Code Section 8.02-8.11 requires disclosure and protection of landmark, significant, and street trees located on private and public property. Any such trees must be shown on the site plans with size of the trunk diameter, tree height, and accurate canopy drip line. Please submit the *Tree Planting and Protection Checklist* with the EEA and ensure trees are appropriately shown on site plans.<sup>5</sup>
13. **Geology.** The project sponsor is required to prepare a geotechnical investigation to identify the primary geotechnical concerns associated with the proposed project and the site, including portions of the project parcels that may have a greater than 20 percent slope. The geotechnical investigation would identify hazards and recommend minimization measures for potential issues regarding, but not limited to, soil preparation and foundation design. The geotechnical investigation should be submitted with the EEA, and will also assist in the archaeological review of the project (see Archaeological Resources section above).
14. **Notification of a Project Receiving Environmental Review.** Notice may be required to be sent to occupants of the project site and properties adjacent to the project site, as well as owners and to the extent feasible occupants, of properties within 300 feet of the project site at the initiation of the environmental review process. Please be prepared to provide these mailing labels upon request during the environmental review process.
15. **Disclosure Report for Developers of Major City Projects.** The San Francisco Ethics Commission S.F. Camp. & Govt. Conduct Code § 3.520 et seq. requires developers to provide the public with information about donations that developers make to nonprofit organizations that may communicate with the City and County regarding major development projects. This report must be completed and filed by the developer of any "major project." A major project is a real estate development project located in the City and County of San Francisco with estimated construction costs exceeding \$1,000,000 where either: (1) The Planning Commission or any other local lead agency certifies an EIR for the project; or (2) The project relies on a program EIR and the Planning Department, Planning Commission, or any other local lead agency adopts any final environmental determination under CEQA. A final environmental determination includes: the issuance of a Community Plan Exemption (CPE); certification of a CPE/EIR; adoption of a CPE/Final Mitigated Negative Declaration; or a project approval by the Planning Commission that adopts CEQA Findings. (In instances where more than one of the preceding determinations occur, the filing requirement shall be triggered by the earliest such determination.) A major project does not include a residential development project with four or fewer dwelling units. The first (or initial) report must be filed within 30 days of the date the Planning Commission (or any other local lead agency) certifies the EIR for that project or, for a major project relying on a program EIR, within 30 days of the date that the Planning Department, Planning Commission, or any other local lead agency adopts a final environmental determination under CEQA. Please submit a Disclosure Report for Developers of Major City Projects to the San Francisco Ethics Commission. This form can be found at the Planning Department or online at <http://www.sfethics.org>.

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<sup>5</sup> Available online at <http://www.sf-planning.org/modules/showdocument.aspx?documentid=8321>.



If the additional analysis outlined above indicates that the project would not have a significant effect on the environment, the project may qualify for a Class 32 Categorical Exemption, in which case the Planning Department would issue a Certificate of Determination of Exemption from Environmental Review.

If the additional analysis performed after submittal of the EEA indicates that the project may have a significant effect on the environment, Planning Department staff would prepare an Initial Study to determine whether an Environmental Impact Report (EIR) is needed. If the Department determines that the project would not have a significant effect on the environment, the Department would issue a Preliminary Negative Declaration. If the Department finds that the project would have significant impacts that can be reduced to a less-than-significant level by mitigation measures agreed to by the project sponsor, then the Department would issue a Preliminary Mitigated Negative Declaration.

If the Initial Study process indicates that the project would result in a significant impact that cannot be mitigated to a less than significant level, an EIR will be required to be prepared by an environmental consultant from the Planning Department's environmental consultant pool. The Planning Department would provide more detail to the project sponsor regarding the EIR process should this level of environmental review be required. Environmental Evaluation Applications are available in the Planning Department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at [www.sfplanning.org](http://www.sfplanning.org).

#### **PLANNING DEPARTMENT APPROVALS:**

The project requires the following Planning Department approvals. These approvals may be reviewed in conjunction with the required environmental review, but may not be granted until after the required environmental review is completed.

1. A **Building Permit Application** is required for the demolition of the existing building on the subject property.
2. A **Building Permit Application** is required for the proposed new construction on the subject property.
3. **Conditional Use Authorization** – the project requires Conditional Use Authorization pursuant to Planning Code Sections, 121.1 of Development of Large Lots, 121.2 for Use Size Limits; and 271 for Bulk Limits.
4. **Variances** – the project requires Variances pursuant to Planning Code Sections 134 for Rear Yards, 712.93 and 135 for Open Space, 136 for Permitted Obstructions, 140 for Dwelling Unit Exposure, 145.1 for Transparency of Ground-Floor Frontage, 151 for Off-Street Parking, 166 for Car Share, and 168 for Diaper Changing Station.

**NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:**

Project Sponsors are encouraged to conduct public outreach with the surrounding community and neighborhood groups early in the development process. Additionally, many approvals require a public hearing with an associated neighborhood notification. Differing levels of neighborhood notification are mandatory for some or all of the reviews and approvals listed above.

This project is required to conduct a **Pre-application** meeting with surrounding neighbors and registered neighborhood groups before a development application may be filed with the Planning Department. The Pre-application packet, which includes instructions and template forms, is available at [www.sfplanning.org](http://www.sfplanning.org) under the "Permits & Zoning" tab. All registered neighborhood group mailing lists are available online at [www.sfplanning.org](http://www.sfplanning.org) under the "Resource Center" tab.

**PRELIMINARY PROJECT COMMENTS:**

The following comments address specific Planning Code and other general issues that may significantly impact the proposed project. For the purpose of providing these comments, the ground floor units along Clara Street are considered non-residential. Designation of these units as residential may alter some of the comments below.

1. **Development of Large Lots.** Planning Code Section 121.1 requires Conditional Use Authorization where the lot size exceeds 10,000 square feet. As the subject property exceeds this size, Conditional Use Authorization is necessary. Note that additional findings are required per Section 121.1(1) & (2).
2. **Use Size Limits.** Planning Code Section 121.2 requires Conditional Use Authorization for non-residential uses in excess of 6,000 square feet in the NC-3 district. As the building proposes retail and office uses which each exceed 6,000 square feet, Conditional Use Authorization is necessary. Note that additional findings are required per Section 121.2(a).
3. **Floor Area Ratio (FAR) –** Planning Code Section requires all non-residential uses to adhere to a 3.6 to 1 FAR limitation. Based on a site survey, the lot size is 12,730 square feet, for an overall non-residential use size of up to 45,828 square feet. Based on the proposed building area calculations provided, the proposed non-residential use size on four floors would be approximately 45,682, which compiles with the Code limitation.
4. **Rear Yard.** Planning Code Section 134 requires the project to provide a rear yard of at least 25 percent of the total lot depth at all residential levels, which is 37 feet from the rear property line of the subject property. The proposal has been designed to locate an equivalent area of 3,478 square feet throughout the development. Alternatively locating the rear yard throughout the development requires that a Variance be sought and justified pursuant to Planning Code Section 134(e)(2). Note that private deck space shown on Sheet G0.04 cannot count towards the rear yard requirement.
5. **Usable Open Space – Residential.** Planning Code Section 135 requires 80 square feet of private open usable space or 100 square feet of common open space for each dwelling unit. Additionally, any such open spaces must meet the dimensional requirements of Section 135(f)&(g). As dimensions are not

provided for balconies adjacent to dwelling units, it is unclear if these features qualify to provide required private open space. Plans for dwelling units adjacent to any deck or balcony area must include access to the open space. Overall, account for units relying on private and common open space separately and show each open area accommodating the required open space on the plans. Indicate how the 30% transparency requirement for decks is met. If the required open space is not provided in the development a Variance must be sought and justified.

6. **Permitted Obstructions** – Planning Code Section 136(c)(2) permits obstructions over the sidewalk within certain dimensions. As the plans do not provide dimensions for the bay windows projecting over the sidewalk along Masonic Avenue it is unclear if they meet, or exceed, the requirement. Should they exceed the requirement a Variance must be sought and justified.
7. **Street Trees.** Planning Code Section 138.1 requires one street tree for every 20 feet of frontage for new construction. The project requires 11 trees which are shown on the plans. Please incorporate notations in future plans that the proposed trees will comply with Planning Code Section 138.1(c)(B)(ii).
8. **Bird-Safe Glazing.** Planning Code Section 139 requires Bird-Safe Glazing if the proposal includes unbroken glazed segments of 24 sf or larger. Please verify whether proposed glazing in the development would include such segments, and identify the glazing treatment.
9. **Dwelling Unit Exposure.** Planning Code Section 140 requires that each dwelling unit have at least one room meeting the 120-square-foot minimum superficial floor area requirement of Section 503 of the Housing Code face directly on a street right-of-way, Code-complying rear yard, or a Code-complying courtyard. The plans show four units located on the interior of the lot that do not face an interior courtyard that is 25 feet in every horizontal dimension for the floor at which the unit in question is located. Furthermore, the courtyard is not set back on the upper floors containing dwelling units. Should the proposal not be revised to comply with the Planning Code, a variance must be sought and justified.
10. **Rooftop Screening.** Future plan drawings should indicate the material proposed to clad all the mechanical equipment.
11. **Ground-Floor Frontages in NC Districts.** Planning Code Section 145.1 controls street frontages in order to promote active uses and visual transparency into the building, and decrease vehicular, bicycle and pedestrian conflicts.
  - a. **Location of Parking & Loading Entrances (145(c)(2)).** The placement of parking and loading entrances should minimize interference with street-fronting active uses and with the movement of pedestrians, cyclists, public transit, and autos. The proposed location of the Masonic Avenue entry may create conflict with all street and sidewalk users as a result of its proximity to the commercial driveway on the adjacent lot occupied by Trader Joes. Minimize the Masonic Avenue garage entry size and consider combining it with the loading driveway fronting Geary Boulevard. To prevent queuing on Masonic Avenue, consider using the entrance along this frontage for egress only.

- b. **Active Uses (145(b)(2)).** The transformer room is not considered an active use. Please revise the proposal to minimize the presence of this feature on the Geary Boulevard frontage. Locating this feature underground is preferable.
  - c. **Transparency and Fenestration (145(c)(6)).** Frontages with active uses that are not residential or PDR must be fenestrated with transparent windows or doorways for no less than 60% of the street frontage at the ground level. Based on this requirement, the windows along Masonic Avenue must extend no less than 14 feet *from grade* at that frontage. As currently proposed, the windows do not appear to meet this requirement and a variance must be sought and justified. Support of this exception is not guaranteed.
12. **Off-Street Parking.** Planning Code Section 151 bases the parking requirement for medical offices and retail space on occupied floor area. Please revise the gross and occupied area calculations to align with the definitions in Planning Code Section 102, and base the parking retail and medical office parking requirements off the revised area calculations. Based on the plans it appears that a variance from the parking requirement must be sought and justified as the proposal does not appear to satisfy the Code requirement. Note that the plans appear to show approximately 79 off-street parking spaces.
13. **Curb Cuts.** Planning Code Section 155(l) requires driveways crossing sidewalks to be no wider than necessary for ingress and egress, and shall be arranged, to the extent practical, so as to minimize the width and frequency of curb cuts, and to minimize conflicts with pedestrian and transit movements. The curb cut and driveway on Masonic Avenue should be minimized to decrease conflict with all right-of-way users. Please revise the overall parking ingress and egress scheme to reduce the curb cut and driveway width on Masonic Avenue. Please explore using the Masonic Avenue driveway for egress only.
14. **Bicycle Storage.** Planning Code Section 155.1 to 155.5 provides the requirements for bicycle storage. Please revise the project area tables to show the occupied floor area (Section 102) and base the non-residential bicycle storage requirement for the retail and medical office uses on the occupied floor area of these uses. Overall, proposed access to the Class I bicycle storage does not appear to meet the intent of the Code as access to the storage area is not convenient and is reliant on narrow, barely-visible hallways and doorways, elevators and a steep, awkward driveway. Although the Planning Code Summary in the PPA Application indicates that Class 2 bicycle storage is provided, the racks are not included on the plans. Please incorporate the racks onto the plans and account for the number of required spaces through the occupied area calculations as discussed in comment number 11 above. The plans must also demonstrate how the clearance requirements for the bicycle racks are met. If the Code requirement is not met, a variance must be sought and justified.
15. **Car Share.** Planning Code Section 166 requires one car share space, which must be noted on the plans, or a variance must be sought and justified.
16. **Unbundled Parking.** Planning Code Section 167 requires all off-street parking spaces accessory to residential uses in new structures of 10 dwelling units or more shall be leased or sold separately from the rental or purchase fees for dwelling units for the life of the dwelling units, such that potential

renters or buyers have the option of renting or buying a residential unit at a price lower than would be the case if there were a single price for both the residential unit and the parking space. In cases where there are fewer parking spaces than dwelling units, the parking spaces shall be offered first to the potential owners or renters of three-bedroom or more units, second to the owners or renters of two bedroom units, and then to the owners or renters of other units. Renters or buyers of on-site inclusionary affordable units provided pursuant to Section 415 shall have an equal opportunity to rent or buy a parking space on the same terms and conditions as offered to renters or buyers of other dwelling units, and at a price determined by the Mayor's Office of Housing, subject to procedures adopted by the Planning Commission notwithstanding any other provision of Section 415*et seq.*

17. **Diaper Changing Station.** Planning Code Section 168 requires a diaper changing station in uses over 5,000 square feet in area. As the proposal includes such areas, please incorporate this requirement into the proposal or seek and justify a variance.
18. **Building Height.** The site's height limit is 80 feet, which is regulated by Planning Code Sections 260 and 102.12. Planning Code Section 260(b)(1) limits those projections over the height limit to no more than 20% of the roof area, and it is unclear if the proposal meets this requirement. Exceptions to the height limit are not available. Planning Code Section 102.12 permits sponsors to choose which frontage they would like to measure height from. It is possible that measuring height from Masonic Avenue would benefit the proposal.
19. **Bulk Limits.** Planning Code Section 270 limits the building's bulk to 110' in length and 140' in diagonal dimension above a height of 40'. As the plans do not provide dimensions for these elements it is unclear if the proposal is Code compliant. Note that the dimension lines on sheet G0.04 must project to the outer building walls to demonstrate the overall dimension. Should the building's bulk exceed the limitations, Conditional Use Authorization can be requested, but it is unclear that the proposal meets the necessary additional criteria per Planning Code Section 271.
20. **Shadow Analysis.** Section 295 requires that a shadow analysis must be performed to determine whether the project has the potential to cast shadow on properties under the jurisdiction of the San Francisco Recreation and Park Commission. Department staff has prepared a shadow fan that indicates the project would not cast shadow on such a property. Therefore, a detailed shadow analysis is not required.
21. **Transit Impact Development Fee (TIDF).** Per Planning Code Section 411, the proposal is subject to the TIDF fee, which shall be payable with respect to any new development in the City for which a building or site permit is issued on or after September 4, 2004. The fee will be calculated at a later date.
22. **Inclusionary Affordable Housing Program.** Planning Code Section 415 requires all residential developments containing five or more new dwelling units to participate in the Inclusionary Housing Program. At the time of entitlement submittal, please indicate how the proposal will comply with this requirement by completing, and providing, *Affidavit for Compliance with the Inclusionary Affordable Housing Program.*

**23. First Source Hiring Agreement.** A First Source Hiring Agreement is required for any project proposing to construct 25,000 gross square feet or more. For more information, please contact:

Ken Nim, Workforce Compliance Officer  
CityBuild, Office of Economic and Workforce Development  
City and County of San Francisco  
50 Van Ness, San Francisco, CA 94102  
(415)581-2303

**PRELIMINARY DESIGN COMMENTS:**

The following comments address preliminary design issues that may significantly affect the proposed project:

**1. Site Design, Open Space, and Massing.** The massing is currently driven by the allowable zoning envelope. The residential levels step back to provide open space and remain within the bulk envelope. Consider exploring a means of further integrating the shape and massing of the upper residential floors with the form of the lower floors.

**2. Street frontage.** In consideration of the narrow sidewalk and the constraints that the slope on Masonic place on the access points and pedestrian circulation, the Planning Department encourages exploring a setback along the frontage to allow more building permeability and active uses to occur along that frontage.

Explore locating the electrical transformer in a sub sidewalk vault to minimize inactive service and utility functions to occupy the façade.

**3. Parking.** The Planning Department commends the limited quantity of parking provided, and recommends the garage opening be limited in width to 12 feet wide, which should be sufficient for the limited number of parking spaces and anticipated trips. A queuing lane may be provided inside, with other interior signalization devices, if necessary. The garage entrance on Masonic will be further analyzed in relation to impacts to and from surrounding streets. But preliminary analysis suggests that any additional queuing on Masonic may add congestion to an already impacted condition. The Planning Department suggests exploring combining an ingress lane with loading on Geary. At that location, due to the underpass, Geary is relatively low volume street, which could accommodate car queuing.

The Bike Parking is located appropriately, but does not appear to provide enough space to accommodate the required quantity of bikes.

**4. Architecture.** The geometry and location of the site lend itself to expressing a sculptural building response which seems to be the initial direction. The Planning Department recommends the vertical modulation on the façade be continuous from the ground to top floor.

The Planning Department expects a strong commitment to high-quality, durable materials and detailing to accompany a highly sculptural building and prominent site.

5. **Streetscape.** Per Planning Code Section 138.1, the Department will require standard streetscape elements and sidewalk widening for the appropriate street type per the Better Streets Plan, including landscaping, site furnishings, and/or corner curb extensions (bulb-outs) at intersections (see Better Streets Plan Section 4 for Standard Improvements and Section 5.3 for bulb-out guidelines). The project sponsor is required to submit a Streetscape Plan illustrating these features, and the department will work with the project sponsor and other relevant departments to determine an appropriate streetscape design. Standard street improvement would be part of basic project approvals not count for as credit towards in-kind contributions.

**PRELIMINARY PROJECT ASSESSMENT EXPIRATION:**

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Conditional Use Authorization, or Building Permit Application, as listed above, must be submitted no later than **August 24, 2016**. Otherwise, this determination is considered expired and a new Preliminary Project Assessment is required. Such applications and plans must be generally consistent with those found in this Preliminary Project Assessment.

Enclosure: Neighborhood Group Mailing List  
Interdepartmental Project Review Application

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