



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: March 5, 2015
TO: Jessie Elliot, GBS School, Applicant
FROM: Delvin Washington, Planning Department
RE: PPA Case No. 2014-002444PPA for 302 Cotter Street

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Tina Chang, at (415) 575-9197 or tina.chang@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

A handwritten signature in black ink, appearing to read "Delvin Washington", written over a horizontal line.

Delvin Washington, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: March 5, 2014
Case No.: **2014-002444PPA**
Project Address: 203 Cotter Street
Block/Lot: 6795A/029
Zoning: RH-1 / 40-X
Within ¼ mile of Fringe Financial Services Restricted Use District
40-X
Area Plan: N/A
Project Sponsor: Jessie Elliot, Golden Bridges School
415.912.8666
jessie.elliott@gmail.com
Staff Contact: Tina Chang – 415.575.9197
tina.chang@sfgov.org

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

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, 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 proposal is to construct a new K-8 grade school campus on the site of an existing urban farm. The campus will include one- and two-story buildings, totaling approximately 12,000sf. The project includes the change of use from neighborhood agricultural to an educational use, and is designed to incorporate farming into the life of the school and curriculum, with the goal of creating an integrated learning environment and net-zero energy campus.

The proposed project is planned to be developed in phases. Phase 1 includes a "Neighborhood Agricultural Resource Center" (see sheet A1.6) and includes single-story buildings placed on-site under the current neighborhood agricultural use. The function of these buildings would be to support the farm activities, and allow children and the community to enjoy and maintain the farm presently occupying the site. Phase 2 includes the repurposing or replacement of buildings constructed under Phase 1, to provide administrative spaces, classrooms and facilities supporting educational uses.

ENVIRONMENTAL REVIEW:

In order to begin formal environmental review, please submit an **Environmental Evaluation (EE) Application**. The application is 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. This review may be done in conjunction with the required approvals listed below, but must be completed before any project approval may be granted. See page 2 of the current *Fee Schedule* for calculation of environmental application fees. **Note that until an approval application is submitted to the Current Planning Division, only the proposed Project Description will be reviewed by the assigned environmental Coordinator.**

If the additional analysis outlined below indicates that the project would not have a significant effect on the environment, the project may qualify for a Class 32 categorical exemption, and the Planning Department would issue a Certificate of Determination of Exemption from Environmental Review. Section 15332 of the CEQA Guidelines, or Class 32, provides a categorical exemption for projects characterized as infill development.

If the additional analysis performed after submittal of the EE Application indicates that the project may have a significant effect on the environment, Planning Department staff would prepare an Initial Study to determine whether a Mitigated Negative Declaration (MND) or Environmental Impact Report (EIR) is needed.

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 below a significant level, an EIR will be required to be prepared by an environmental consultant from the Planning Department's environmental consultant pool.¹ The Planning Department would provide more detail to the project sponsor regarding the EIR process should this level of environmental review be required.

Below is a list of topic areas that would require additional study based on our preliminary review of the project as it is proposed in the Preliminary Project Assessment (PPA) submittal.

1. Historic Architectural Resources. The project site is a vacant lot in an area that has not been previously surveyed and is considered to be a potential historic resource; therefore, the proposed new construction is subject to review by the Department's Historic Preservation staff. The Department's Historic Preservation staff will review the proposed project; however, an Historic Resource Evaluation (HRE) report is not required.

2. Transportation. Based on a review of the PPA Application, the Department has determined that a transportation study is not likely to be required. However, a formal determination will be made subsequent to submittal of the EE Application. In order to facilitate that determination, Planning staff

¹ A list of prequalified Environmental Consultants in the Pool can be found at: <http://www.sf-planning.org/index.aspx?page=3458>.

propose that, as part of the EE Application, project sponsor provide information on the number of students and staff at buildout and also provide pick-up and drop-off management plan that describes times and location(s) for student pick-ups and drop-offs. Staff also recommends the project sponsor consider maintaining a continuous sidewalk in front of the project site and that project design prioritizes pedestrian safety.

3. Air Quality. The proposed project's approximately 12,000 square feet of institutional uses are below the Bay Area Air Quality Management District's (BAAQMD) construction and operational screening levels for criteria air pollutants.² Therefore an analysis of the project's criteria air pollutant emissions is not likely to be required.

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 a series of amendments to the San Francisco Building and Health Codes generally referred hereto as 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 prepare a Construction Dust Control Plan for review and approval by the San Francisco Department of Public Health (DPH).

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.

4. Hazardous Materials. The proposed project would construct approximately 12,000 sf of institutional uses on the project site. Although the project site is not located in an area identified on the Maher Map (which maps sites with known or potential subsurface soil or groundwater contamination), given the site's prior/existing uses as an urban farm, the project may nevertheless 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.

² BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3.

Therefore, please provide a Phase I ESA with the EE Application and the assigned environmental coordinator will advise as to whether or not the project sponsor should apply to the Maher Program.

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 Qualified GHG Reduction Strategy, the Planning Department has prepared a Greenhouse Gas Analysis Compliance Checklist.³ The project sponsor is required to submit the completed table regarding project compliance with the identified regulations and provide project-level details in the discussion column. This information will be reviewed by the environmental planner during the environmental review process to determine if the project would comply with San Francisco's Greenhouse Gas Reduction Strategy. Projects that do not comply with an ordinance or regulation may be determined to be inconsistent with the Greenhouse Gas Reduction Strategy.

6. Hydrology and Water Quality. The project would disturb more than 5,000 square feet of ground surface, 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 of 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>.

7. Shadow. The proposed project would result in construction of several structures, the tallest of which would be approximately 36 feet in height. Planning Code section 295 requires that a shadow analysis must be performed for projects over 40 feet in height to determine whether a project has the potential to cast shadow on properties under the jurisdiction of the San Francisco Recreation and Park Commission. Given the height of the proposed structures, no shadow analysis or further review related to shadow impacts is required for the proposed project.

8. Tree Planting and Protection Checklist. 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 the size of the trunk diameter, tree height,

³ Refer to <http://sfplanning.org/index.aspx?page=1886> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

and accurate canopy drip line. Please submit a *Tree Planting and Protection Checklist*⁴ with the EE Application and ensure that trees are appropriately shown on site plans.

9. Notification of a Project Receiving Environmental Review. Notice is required to be sent to occupants of the project site and properties adjacent to the project site, as well as to owners and to the extent feasible occupants of properties within 300 feet of the project site at the initiation of the environmental review. Please be prepared to provide mailing addresses on a CD upon request following submittal of the EE Application.

10. 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 occurs, 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>.

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. Conditional Use Authorization.** Pursuant to Planning Code Section 209.3, a conditional use authorization is required to establish an elementary and secondary school within a Residential District.
- 2. Variance.** Pursuant to Planning Code Section 305 and 134, a Variance Application may be required as the proposed development appears to encroach within the required front and rear yard setbacks. However, as the subject property exceeds ½ an acre in size, a **Planned Unit Development** per

⁴ The Tree Planting and Protection Checklist can be found at: <http://sf-planning.org/modules/showdocument.aspx?documentid=8321>.

Planning Code Section 304 may be sought for the modification of Planning Code provisions in lieu of seeking Variances. Planned Unit Developments are intended for projects on sites of considerable size, developed as integrated units and designed to produce an environment of stable and desirable character which will benefit the occupants, the neighborhood and the City as a whole. In cases of outstanding overall design, complementary to the design and values of the surrounding area, such a project may merit a well-reasoned modification of certain provisions of the Planning Code.

3. **Building Permit Applications.** Building permit applications are required for the new construction of the five structures proposed on-site. Building permit applications will also be required for the modular structures proposed for Phase 1 of the project. Should the use of these structures change from their current purpose as serving neighborhood agricultural purposes, entitlement may not be granted until after Conditional Use Authorization has been attained.

NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

The project is subject to the noticing requirements pursuant to Planning Code Section 311. Additionally, a **Pre-application** meeting with surrounding neighbors and registered neighborhood groups is required 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 under the "Permits & Zoning" tab. All registered neighborhood group mailing lists are available online at www.sfplanning.org under the "Resource Center" tab. Project Sponsors are encouraged to conduct public outreach with the surrounding community and neighborhood groups early in the development process.

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. **Floor Area Ratio.** Planning Code Section 124 limits the Floor Area Ratio in RH-1 districts to 1.8:1. As your parcel measures approximately 30,744 square feet, the project's gross building square footage is limited to approximately 55,393 square feet. As proposed, your project complies with floor area ratio limits.
2. **Rear Yard.** Planning Code Sections 134(a)(1)(C), the project requires a minimum rear yard equal to 25% of total lot depth on the lot in which the building is situated. The project appears to encroach within the rear yard requirement, thus requiring a Variance from the Planning Code, or the approval of a Planned Unit Development permitting modifications from Planning Code provisions.
3. **Front Yard.** Planning Code Section 132 requires a front yard equal to the average setbacks of both adjacent properties. As proposed, the project appears to encroach within the front yard requirement, thus requiring a Variance from the Planning Code, or the approval of a Planned Unit Development permitting modifications from Planning Code Provisions. Although the building at the ground floor

appears to comply with front setback requirements, the building at the 2nd level does not appear to comply with obstructions permitted in Planning Code Section 136.

4. **Screening of Rooftop Features.** Planning Code Section 141 requires that rooftop mechanical equipment and appurtenances to be used in the operation or maintenance of a building be arranged so as not be visible from any point at or below the roof level of the subject building. The features so regulated shall in all cases be either enclosed by outer building walls or parapets, or grouped and screened in a suitable manner, or designed in themselves so that they are balanced and integrated with respect to the building design. Minor features not exceeding one foot in height shall be exempted from this requirement.
5. **Better Streets Plan.** Per Planning Code Section 138.1(c)(2), all applicable streetscape plan requirements are applicable, including clearance from the Department's Streetscape Design Advisory Team (SDAT) as your project is greater than ½ acre in total area and involves new construction. Please find the Better Streets Plan required checklist here: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=9310>.
6. **Bicycle Parking.** Planning Code Section 155.2 requires the construction of a new building to provide two Class 1 and one Class 2 bicycle parking spaces for every elementary school classroom and four Class 1 and one Class 2 bicycle parking spaces for every secondary (middle) school classroom. It is unclear how many classrooms are will serve as elementary and how many as secondary school classrooms. However, at least 10 Class 1 and five Class 2 bicycle parking spaces are required. Please refer to Zoning Administrator Bulletin No. 9 for more information found here: http://www.sf-planning.org/ftp/files/publications_reports/bicycle_parking_reqs/ExhibitC_ZAB.pdf.
7. **First Source Hiring Agreement.** A First Source Hiring Agreement is required for any project proposing to construct 25,000 gross square feet or more. Your project does not currently reach this threshold. Should it be revised to meet such requirements in later iteration, please contact the individual below for more information:

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
8. **Stormwater.** Projects that disturb 5,000 square feet or more of the ground surface must comply with the Stormwater Design Guidelines and submit a Stormwater Control Plan to the SFPUC for review. To view the Guidelines and download instructions for preparing a Stormwater Control Plan, go to <http://stormwater.sfwater.org/>. Applicants may contact stormwaterreview@sfwater.org for assistance.
9. **Recycled Water.** The City requires property owners to install dual-plumbing systems for recycled water use in accordance with Ordinances 390-91, 391-91, and 393-94, within the designated recycled

water use areas for new construction projects larger than 40,000 square feet. Please see the attached SFPUC document for more information.

PRELIMINARY DESIGN COMMENTS:

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

1. **Site Design, Open Space, and Massing.** Generally, the site design, massing, and open space is appropriate. However, in deference to the adjacent residential neighbors, the Planning Department recommends that the project consider pulling the classroom building away from the side property line. This could be done in a configuration that reinforces the courtyard spaces.
2. **Parking.** The Planning Department recommends the curb cut and garage opening be limited to a single lane in width of no more than 12 feet wide and recessed from the face of the building.
3. **Architecture.** The Planning Department appreciates the scale and disaggregated buildings that attempt to be compatible with the surrounding residential uses.

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 **September 5, 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
 Flood Notification: Planning Bulletin
 SFPUC Recycled Water Information Sheet

cc: Abigail Coburn and Harris Epstein, Property Owner
 Tina Chang, Current Planning
 Tania Sheyner, Environmental Planning
 Robin Abad, Citywide Planning and Analysis
 David Winslow, Department Design Review
 Jonas Ionin, Planning Commission Secretary
 Delvin Washington, SW Team Leader
 Jerry Robbins, MTA
 Jerry Sanguinetti, DPW