



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: March 24, 2015
TO: Mark H. Loper
FROM: Rick Cooper, Planning Department
RE: PPA Case No. 2014-003090PPA for 350 Masonic Avenue/
2120-2130 Golden Gate Avenue

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, Elizabeth Purl, at (415) 575-9028 or elizabeth.purl@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

A handwritten signature in cursive script that reads "Rick Cooper".

Rick Cooper, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: March 24, 2015
Case No.: **2014-003090PPA**
Project Address: 350 Masonic Avenue
Block/Lot: 1149/029, 010, 011
Zoning: RH-3 (Residential- House, Three Family)
40-X
Area Plan: None
Project Sponsor: Mark H. Loper
Reuben, Junius & Rose
415-567-9000
Staff Contact: Elizabeth Purl– 415-575-9028
elizabeth.purl@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, 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 350 Masonic Avenue on the northeast corner of the intersection of Masonic Avenue and Golden Gate Avenue on the block bounded by Masonic Avenue to the west, Turk Street to the north, Central Avenue to the east, and Golden Gate Avenue to the south. The project site is approximately 46,500 square feet (sf) and is developed with two school buildings (the San Francisco Day School) with a total area of approximately 54,288 sf and two residential buildings: an unoccupied single-family dwelling currently used by the school for storage (Lot 11) and a two-unit residential building (Lot 010). The two buildings together have an area of approximately 3,000 sf; they are separated from the main school buildings by a small parking lot. The proposal is to demolish the two existing, occupied residential buildings and parking lot and construct a 2-story over basement, 26-foot-tall addition to be used for classrooms and school offices. The total floor area of the proposed addition would be approximately 23,000 sf. Pedestrian access and loading would be from Golden Gate Avenue. The project would entail

demolition of three dwelling units. It would also reduce the width of an existing 30-foot-wide curb cut along Golden Gate Avenue and eliminate approximately 9 parking spaces currently on site. The Preliminary Project Assessment (PPA) application indicates that approximately 30 off-site parking spaces would be provided; however, the location has not been specified.

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. EEAs 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 under the "Publications" tab. See "Environmental Applications" on page 2 of the current Fee Schedule for calculation of environmental application fees.¹ **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).** The proposed project would include alteration or demolition of a Category B property (a potential historic resource). The existing buildings on the project site are considered potential historic resources (buildings constructed 45 or more years ago); therefore, the proposed project consisting of alteration or demolition is subject to the Department's Historic Preservation review, which would include preparation of a Historic Resource Evaluation (HRE) by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards. The department will provide the project sponsor with a list of three consultants from the Historic Resource Consultant Pool, which shall be known as the potential consultant list or PCL. Once the EEA is submitted, please contact Tina Tam, Senior Preservation Planner, via email (tina.tam@sfgov.org) for the list of three consultants. Upon selection of the historic resource consultant, the scope of the Historic Resource Evaluation shall be prepared in consultation with Department Preservation staff.
2. **Archeological Resources.** Project construction would include soil-disturbing activities approximately 20 feet deep for basement and foundation construction. The project would therefore require a Preliminary Archeological Review (PAR), which would be conducted in-house by the Planning Department Archeologist. The PAR will: (1) determine what type of soils disturbance/modifications would result from the proposed project, such as excavation, installation of foundations, soils improvements, site remediation, etc.; (2) determine whether or not the project site is located in an area of archeological sensitivity; and (3) determine what additional steps may be necessary to identify and evaluate any potential archeological resources that may be affected by the proposed project. Any geotechnical or soils characterization studies or Phase I or II site assessment prepared for the proposed project would be helpful to the PAR process and should be

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

submitted with the EEA. Please ensure that project drawings and the project description include the estimated depth of excavation, including the depth of the foundation as well as the depth of any elevator pit required.

3. **Transportation Study.** Based on the PPA submittal and the Planning Department's Preliminary Transportation Consultation/Preliminary Transportation Study Determination Request dated March 12, 2015, no determination has been made at this time as to whether a transportation study is required. An official determination will be made subsequent to submittal of the EEA. Planning Department staff have the following notes/recommendations after reviewing the PPA plans submitted:
 - a. Plans submitted with the EE application should show locations and dimensions of all existing and proposed curb cuts.
 - b. Plans should clearly show buildings/areas proposed for demolition and construction.
 - c. Plans should include existing and proposed locations of loading and parking spaces.
 - d. A circulation memo showing pick-up and drop-off operations is likely to be required.
4. **Air Quality (AQ) Analysis.** According to the PPA application, the proposed project includes demolition of two existing single-family residences and construction of approximately 23,000 sf of academic/office space, which is below the Bay Area Air Quality Management District's (BAAQMD) construction and operational screening levels for criteria air pollutants. Therefore, an analysis of the project's criteria air pollutant emissions is not likely to be required. However, detailed information related to the amount (in cubic yards) of excavation must be provided as part of the EEA.

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 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.

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 that 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 must be provided with the EEA. During the environmental review process, the project will be screened for potential air quality impacts.

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 is 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. **Noise.** The Planning Department's noise maps indicate that the portion of the proposed project site along Masonic Avenue is within an area where existing ambient noise levels on surrounding streets are at or exceed 75 decibels. Only interior renovations are proposed in that part of the existing building, and there would be no change of use. The proposed addition would be located on a section of Golden Gate Avenue where ambient noise is within acceptable levels. However, because the project involves the siting of new noise-sensitive uses (e.g., school uses), an acoustical analysis demonstrating that the building will meet Title 24 noise insulation standards may be required. The requirement for such an analysis will be determined following submittal of the EEA. In addition, open space provided as per the Planning Code should be protected to the maximum extent feasible from existing ambient noise that could prove annoying or disruptive to users of the open space.
7. **Hazardous Materials.** Because the existing buildings were constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the buildings. The Bay Area Air Quality Management District (BAAQMD) is responsible for regulating airborne pollutants including asbestos. Please contact BAAQMD for requirements related to demolition of buildings that may contain asbestos-containing materials. In addition, because of its age, lead paint may be found in the existing buildings. Please contact the San Francisco Department of Building Inspection (DBI) for requirements related to demolition of buildings that may contain lead paint.
8. **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 archeological review of the project (see Archeological Resources section above).
9. **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 and the Stormwater Design Guidelines, or to download instructions for the Stormwater Control Plan, go to <http://sfwater.org/sdg>.

10. **Tree Planting and Protection.** 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 that trees are appropriately shown on site plans.² Also see the comments below under "Street Trees."
11. **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.
12. **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

² Available online at <http://www.sf-planning.org/modules/showdocument.aspx?documentid=8321>.

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>.

Based on the information provided in the PPA application, the project may require preparation of an Environmental Impact Report (EIR) to assess impacts to historic resources. 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 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.

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 **Conditional Use Authorization Application** is required for the project per Planning Code Section 303 and pursuant to the following Planning Code Sections:
 - a. **Elementary School Use in RH-3 Zoning.** Planning Code Section 209.3(g).
 - b. **Demolition of Dwelling Units.** Planning Code Section 317.
2. **Planned Unit Development.** Pursuant to Planning Code Section 304, a development lot area which exceeds 21,781 sf (a half-acre) may seek certain modifications from the base zoning requirements of the RH-3 Zoning District as a Planned Unit Development (PUD) through the Conditional Use process. As proposed, the project may require the following exceptions through the PUD review process:
 - a. **Front Setback.** Planning Code Section 132.
 - b. **Rear Yard.** Planning Code Section 134.
 - c. **Off-Street Parking.** Planning Code Section 151.
 - d. **Bicycle Parking, Shower, and Locker Facilities.** Planning Code Sections 155.2 and 155.4.
 - e. **Car Share.** Planning Code Section 166.
3. A **Building Permit Application** is required for the demolition of the existing buildings on the subject property.

4. A **Building Permit Application** is required for the proposed new construction on the subject property.

Conditional Use Authorization 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. Building Permit applications are available at the Department of Building Inspections at 1660 Mission Street.

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 under the "Permits & Zoning" tab. All registered neighborhood group mailing lists are available online at 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 affect the proposed project.

1. **Elementary School Use.** The expansion of an existing Elementary School use within an RH-3 Zoning District requires Conditional Use Authorization per Planning Code Section 209.3(g).
2. **Residential Demolition.** The proposed demolition of the two residential buildings on Lots 010 and 011 requires Conditional Use Authorization per Planning Code Section 317(d). In total, the project proposes the removal of three dwelling units, two of which are rental properties and one of which was converted to storage for the school without benefit of a permit. The Planning Department has serious concerns regarding the current project's consistency with the criteria to be considered by the Planning Commission in the review of residential demolition, as specified in Planning Code Section 317(d). The Department strongly encourages revising the proposal to preserve the existing dwelling units. Furthermore, please be advised that the Planning Department must prioritize the preservation of existing rental housing stock per the Mayor's *Executive Directive 13-01* issued on December 18, 2013.
3. **Front Setback.** Pursuant to Planning Code Section 132, the required front setback for the subject development is equal to one-half of the front setback of the adjacent building. As proposed, the project does not comply with this requirement and would need to be revised accordingly or to request a Code modification through the Planned Unit Development (PUD) process.

4. **Rear Yard Requirement.** Pursuant to Planning Code Section 134(c)(4)(A), the required rear yard for the subject development is equal to the depth of the adjacent building's rear yard. However, in no case may the required rear yard be reduced to less than 25 percent of the total depth of the lot, or 15 feet, whichever is greater. Accordingly, any proposed building volume within the required rear yard, or building area below grade that is within the last 15 feet, must request a Code modification through the PUD process.
5. **Street Trees.** Planning Code Section 138.1(c)(1) requires new construction projects to provide one street tree for every 20 feet of frontage. The proposal has approximately 325 feet of frontage on Golden Gate Avenue and 162.50 feet of frontage on Masonic Avenue. Therefore, the project must include 16 trees on Golden Gate Avenue and eight street trees on Masonic Avenue. Existing trees may count towards this requirement. However, any proposed trees must also comply with the following standards:
 - a. Comply with Public Works Code Article 16 and any other applicable ordinances;
 - b. Be suitable for the site;
 - c. Be a minimum of one tree of 24-inch box size for each 20 feet of frontage of the property along each street or alley, with any remaining fraction of 10 feet or more of frontage requiring an additional tree. Such trees shall be located either within a setback area on the lot or within the public right-of-way along such lot;
 - d. Provide a below-grade environment with nutrient-rich soils, free from overly-compacted soils, and generally conducive to tree root development; and
 - e. Be watered, maintained and replaced if necessary by the property owner, in accordance with Sec. 174 and Article 16 of the Public Works Code and compliant with applicable water use requirements of Chapter 63 of the Administrative Code.
6. **Streetscape Plan.** In addition to the street trees required above, the project must provide a streetscape plan including improvements consistent with Planning Code Section 138.1(c)(2). Please see the "Preliminary Design Comments" for suggestions on how to meet this requirement.
7. **Off-Street Parking.** Planning Code Section 151 requires that the project provide one off-street parking space for every six elementary school classrooms. Additionally, Planning Code Sections 151(c) and 204.5 limit the maximum amount of accessory parking spaces to 150 percent of the required number of spaces. The PPA application indicates that the site has 18 existing off-street parking spaces, but will retain no spaces on site, and will provide up to 30 off-street parking spaces off site. Please note that any required parking provided off site must comply with Planning Code Section 159. Deviation from the off-street parking requirements of the Planning Code can be modified through the PUD process.
8. **Bicycle Parking, Showers, and Lockers.** Planning Code Section 155.2 requires that the project provide a minimum of two Class 1 and one Class 2 bicycle parking spaces for each classroom, including existing classrooms. Additionally, Planning Code Section 155.4 requires the project to provide four showers and 24 lockers. Currently, the proposal proposes none of these facilities and would therefore require a modification as a PUD. The Planning Department strongly encourages

that the project attempt to, at a minimum, partially meet these requirements and incorporate the Class 2 bicycle parking spaces into the required Streetscape Plan.

9. **Car Share.** Planning Code Section 166 requires one car share parking space when providing 25 or more off-street parking spaces for a non-residential use. Alternatively, the project may seek a modification through the PUD process.
10. **Transit Impact Development Fee (TIDF).** Pursuant to Planning Code Section 411 et seq., the Transit Impact Development Fee will apply to the non-residential uses of this project. Please be aware that an ongoing process, the Transportation Sustainability Program, may eventually replace the Transit Impact Development Fee. You can find more information about this program at: <http://www.sf-planning.org/index.aspx?page=3035>. The project may be eligible for TIDF credits for providing parking below the maximum allowed as per Planning Code Section 411.3(d).

PRELIMINARY DESIGN COMMENTS:

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

1. **Site Design, Open Space, and Massing.** Overall, the massing and size and location of open space are appropriate. However, alternate massing and open space should be considered in response to comments in this Preliminary Project Assessment regarding loss of dwelling units and the proposed demolition of the two residential buildings on site.
2. **Architecture.** The Planning Department recommends the retention and re-use of the two existing buildings, and suggests alternate means to accommodate the school's expansion program that retain all or significant portions of the existing buildings.
3. **Parking.** The Planning Department supports the removal of on-site parking.
4. **Streetscape Improvements.** 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 streetscape improvements would be part of basic project approvals and would not count for credit towards in-kind contributions.
5. **Neighborhood Character.** The Housing Element of the General Plan seeks to maintain the unique and diverse character of San Francisco's neighborhoods, specifically requiring the consideration of neighborhood character when integrating uses and minimizing disruption caused by the expansion of institutions. New development should also strengthen local culture, sense of place, and history, per Housing Element Policy 11.8.

6. **Urban Design Element.** The Urban Design Element of the General Plan also calls for preservation of aesthetic value and continuity with the past, in particular through the renovation of old buildings (Policies 2.4 and 2.5). This element requires protecting the character of residential properties from the intrusion of incompatible new buildings. Especially considering the character of the existing property's frontage on Golden Gate Avenue, the demolition of existing residential buildings and replacement with additional institutional buildings should be considered in light of these policies.

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 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.

cc: David E. Jackson, Property Owner's Representative
Brittany Bendix, Current Planning
Jeremy Shaw, Citywide Planning and Analysis
Jonas Ionin, Planning Commission Secretary
Charles Rivasplata, MTA
Planning Department Webmaster (webmaster.planning@sfgov.org)