



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**DATE:** February 11, 2015  
**TO:** Andrew Junius  
**FROM:** Joshua Switzky, Planning Department  
**RE:** PPA Case No. 2014-000203PPA for 655 4<sup>th</sup> Street

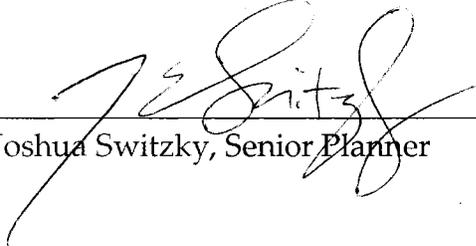
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Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Amnon Ben-Pazi, at (415) 575-9077 or [Amnon.Ben-Pazi@sfgov.org](mailto:Amnon.Ben-Pazi@sfgov.org), to answer any questions you may have, or to schedule a follow-up meeting.

  
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Joshua Switzky, Senior Planner



# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Project Assessment

*Date:* February 11, 2015  
*Case No.:* **2014-000203PPA**  
*Project Address:* 655 4<sup>th</sup> Street  
*Block/Lot:* 3787/026, 161  
*Zoning:* SLI (Service/Light Industrial)  
85-X, 55-X  
*Area Plan:* Eastern Neighborhoods  
Draft Central SoMa Plan  
*Project Sponsor:* Andrew Junius  
Reuben, Junius & Rose, LLP  
ajunius@reubenlaw.com  
415-567-9000  
*Staff Contact:* Amnon Ben-Pazi – 415 575 9077  
[Amnon.Ben-Pazi@sfgov.org](mailto:Amnon.Ben-Pazi@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, 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 demolish the existing buildings at the project site and construct a 41-story, 400-foot tall mixed use building. The proposed new building would include approximately 449 dwelling units, 97 parking spaces on two underground levels, and 9,241 square feet of ground-floor retail space.

### PLANNING CONTEXT:

The proposed project is located within the Eastern Neighborhoods Area Plan, which was evaluated in *Eastern Neighborhoods Rezoning and Area Plans Programmatic Final Environmental Impact Report (Eastern Neighborhoods FEIR)*, certified in 2008.<sup>1</sup> The project site also falls within the proposed Central SoMa Plan

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<sup>1</sup> Available for review on the Planning Department's Area Plan EIRs web page: <http://www.sf-planning.org/index.aspx?page=1893>.

area, a community planning process initiated in 2011. The Central Corridor Plan Draft for Public Review<sup>2</sup> (draft Plan) was released in April 2013, with proposed changes to the allowed land uses and building heights in the Plan area, including a strategy for improving the public realm within the Plan area and vicinity. The draft Plan is available for download at <http://centralsoma.sfplanning.org>. The Central SoMa Plan will be evaluated in an Environmental Impact Report (EIR), which is currently underway. The draft Plan and its proposed rezoning are anticipated to be before decision-makers for approval in early 2016.

The existing zoning for the project site is SLI (Service/Light Industrial), which does not allow residential uses, while the proposed use district for the project site in the draft Plan is Mixed-Use Office (MUO), which would allow residential uses, as proposed under the project. The draft Plan includes two height alternatives. The Central SoMa Plan EIR will study the draft Plan's Mid-Rise Height Alternative and a modified High-Rise Height Alternative, which include different proposed height limits for the project site. Under the Mid-Rise Height Alternative the proposed height and bulk designation for the site is 85P/320T, which would allow a building up to 320 feet tall, while under the modified High-Rise Height Alternative the height and bulk designation for the project site would be 85P/400T, allowing a building up to 400 feet tall. At this point, it is unknown which height option, if any, would ultimately be approved by the Planning Commission and Board of Supervisors. Further comments in this Preliminary Project Assessment (PPA) are based on the draft Plan concepts published to date, which are contingent on the approval of the proposed Central SoMa Plan rezoning by the Planning Commission and Board of Supervisors.

## ENVIRONMENTAL REVIEW:

The proposed project requires environmental review either individually, with a project-specific Initial Study/Mitigated Negative Declaration or EIR, or in a Community Plan Exemption (CPE) if the project is consistent with an approved community plan. Section 15183 of the California Environmental Quality Act (CEQA) Guidelines states that projects that are consistent with the development density established by a community plan for which an EIR was certified do not require additional environmental review, except as necessary to determine the presence of peculiar project-specific significant effects not identified in the programmatic plan area EIR.

As stated above, the proposed project is located within the Eastern Neighborhoods Area Plan, which was evaluated in the *Eastern Neighborhoods FEIR*. However, the proposed project is not consistent with the land use or development density (zoning) identified in the Eastern Neighborhoods Area Plan, and it is therefore not eligible for a CPE under the *Eastern Neighborhoods FEIR*. Nonetheless, because the project site is within the geographic area evaluated in the *Eastern Neighborhoods FEIR*, any development on the project site would potentially be subject to the mitigation measures identified in that document. Potentially significant project environmental impacts that were identified in and pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods FEIR* that may be applicable to the proposed project are included below, under the applicable environmental topic. However, it should also be noted that mitigation measures from the *Eastern Neighborhoods FEIR* that are applicable to the proposed project

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<sup>2</sup> Please note that the Central SoMa Plan was formerly called the Central Corridor Plan. To avoid ambiguity, this letter uses the current "Central SoMa Plan" when referring to the ongoing planning process, while "draft Plan" is the draft Plan document published in April 2013 under the name "Central Corridor Plan Draft for Public Review".

area could be refined, augmented, or superseded under the future Central SoMa Plan EIR, which would become applicable to the proposed project if the draft Plan is approved.

The Project's proposed 400-foot building height would be consistent with one of the two height limit alternatives currently being studied in the Central SoMa Plan EIR. Thus, it is possible that the proposal, as currently presented, would qualify for a CPE under the proposed Central SoMa Plan EIR once that EIR is certified and the Planning Commission and Board of Supervisors have adopted new zoning controls. However, the proposed project would be assessed based on the height limits for the project site in place at the time that the Planning Department entitlements for the proposed project are sought. Within the CPE process, there can be three different outcomes, as follows.

1. **CPE Only.** All potentially significant project-specific and cumulatively considerable environmental impacts are fully consistent with significant impacts identified in the underlying area plan EIR, and there would be no new "peculiar" significant impacts unique to the proposed project. In these situations, all pertinent mitigation measures and CEQA findings from the underlying area plan FEIR are applied to the proposed project, and a CPE checklist and certificate is prepared. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,659) and (b) the CPE certificate fee (currently \$7,580).
2. **Mitigated Negative Declaration.** If new site- or project-specific significant impacts are identified for the proposed project that were not identified in the underlying area plan EIR, and if these new significant impacts can be mitigated to a less-than-significant level, then a focused mitigated negative declaration is prepared to address these impacts, and a supporting CPE checklist is prepared to address all other impacts that were encompassed by the underlying area plan EIR, with all pertinent mitigation measures and CEQA findings from the underlying area plan EIR also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,659) and (b) the standard environmental evaluation fee (which is based on construction value).
3. **Focused EIR.** If any new site- or project-specific significant impacts cannot be mitigated to a less-than-significant level, then a focused EIR is prepared to address these impacts, and a supporting CPE checklist is prepared to address all other impacts that were encompassed by the underlying area plan EIR, with all pertinent mitigation measures and CEQA findings from the underlying area plan EIR also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,659) and (b) the standard environmental evaluation fee (which is based on construction value). A proportionate share fee for recovery for costs incurred by the Planning Department for preparation of the underlying plan EIR may also be required. Fees for the preparation of the Central Corridor Plan EIR have yet to be determined.

If the proposed project does not fit within the height and density identified for the project site in the certified and adopted Central SoMa Plan, the proposed project would be precluded from qualifying for a CPE under the Central SoMa Plan. Alternatively, the proposed project could be analyzed individually, as proposed, in a separate environmental document that would not rely on the environmental analysis undertaken for the Central SoMa Plan. This would preclude the proposed project's reliance on the certification of the Central SoMa Plan EIR. In the case of a separate environmental document, the

applicable fees would be (a) the standard environmental evaluation (EE) fee based on the cost of construction; and (b) the standard EIR fee, if an EIR is required.

In order to begin formal environmental review, please submit an **Environmental Evaluation Application**. The Environmental Evaluation Application can be submitted at the same time as the Preliminary Project Assessment Application. The environmental review may be done in conjunction with the required approvals listed below, but must be completed before any project approval may be granted. **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.** See page 2 of the current *Fee Schedule* for calculation of environmental application fees.

Below is a list of topic areas that would require additional study based on the preliminary review of the project as it is proposed in the Preliminary Project Assessment (PPA) submittal dated October 10, 2014.

- **Historic Resource Evaluation (HRE).** The existing building on the project site was previously evaluated in a historical resources survey and found ineligible for national, state, or local listing; thus, no additional analysis of historical resources is required.
- **Archeological Resources.** Project implementation would entail soil-disturbing activities associated with building construction, including excavation that would reach a depth of approximately 20 feet below grade. The project site is located within an area where no previous archeological survey has been prepared. The *Eastern Neighborhoods FEIR* noted that California Register of Historical Resources (CRHR)-eligible archeological resources are expected to be present within existing sub-grade soils of the Plan Area and the proposed land use policies and controls within the Plan Area could adversely affect significant archeological resources.

The project site lies within the *Archeological Mitigation Zone J-2: Properties with No Previous Studies* of the Eastern Neighborhoods Rezoning and Area Plans FEIR that would require for the proposed project either Preliminary Archeological Review (PAR) conducted in-house by the Planning Department archeologist or the preparation of a Preliminary Archeological Sensitivity Assessment (PASS) by a Department Qualified Archeological Consultant subject to review and approval by the Department archeologist. In almost all cases, the project sponsor would choose the PAR process. The PAR will determine first what type of soils disturbance/modifications would result from the proposed project, such as excavation, installation of foundations, soils improvements, site remediation, etc.; second, whether or not the project site is located in an area of archeological sensitivity; and third, what additional steps are necessary to identify and evaluate any potential archeological resources that may be affected by the project. Helpful to the PAR process is the availability of geotechnical or soils characterization studies prepared for the project. The results of this review will be provided in a memorandum to the Environmental Planner assigned to the project.

Alternatively, preparation of a PASS would require the project sponsor to retain the services of a qualified archeological consultant from the Planning Department's rotational Qualified Archeological Consultants List (QACL). The project sponsor must contact the Department archeologist to obtain the

names and contact information for the next three archeological consultants on the QACL. The complete QACL is available at

[http://www.sf-planning.org/ftp/files/MEA/Archeological\\_Review\\_consultant\\_pool.pdf](http://www.sf-planning.org/ftp/files/MEA/Archeological_Review_consultant_pool.pdf).

The Preliminary Archeological Sensitivity Study (PASS) should contain the following:

- 1) The historical uses of the project site based on any previous archeological documentation and Sanborn maps;
- 2) A determination of the types of archeological resources/properties that may have been located within the project site and whether the archeological resources/property types would potentially be eligible for listing in the CRHR;
- 3) A determination if 19<sup>th</sup> or 20<sup>th</sup> century soils-disturbing activities may have adversely affected the identified potential archeological resources;
- 4) An assessment of potential project effects in relation to the depth of any identified potential archeological resources; and
- 5) A conclusion with assessment of whether any CRHP-eligible archeological resources could be adversely affected by the proposed project and recommendation as to appropriate further action.

Based on the PAR or the PASS, the Department archeologist will determine if and what additional measures are necessary to address potential effects of the project to archeological resources. These measures may include implementation of various archeological mitigations such as accidental discovery, archeological monitoring, and/or archeological field investigations. In cases of potential higher archeological sensitivity, preparation of an Archeological Research Design/Treatment Plan (ARD/TP) by an archeological consultant from the QACL may be required.

- **Transportation Study.** Based on the Planning Department's transportation impact analysis guidelines, the project would require additional transportation analysis to determine whether the project may result in a significant impact. Therefore, the Planning Department requires that a consultant listed on the Planning department's Transportation Consultant Pool prepare a Transportation Study. You are required to pay special fees for the Study; please contact Vernaliza Byrd at (415) 575-9025 to arrange payment. Once you pay the fees, please contact Manoj Madhavan at (415) 575-9095 or [manoj.madhavan@sfgov.org](mailto:manoj.madhavan@sfgov.org) so that he can provide you with a list of three consultants from the Transportation Pool and direct the scope of the study. Planning staff also recommend that you ensure that site design is consistent with the Draft Central SoMa Plan.
- **Hazardous Materials.** The proposed project would disturb in excess of 50 cubic yards of soil in an area with artificial fill and known prior industrial use. Therefore, the project 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 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 a copy of the submitted Maher Application and Phase I ESA with the Environmental Evaluation Application (EEA).

*Eastern Neighborhoods EIR Hazardous Materials Mitigation Measure L-1: Hazardous Building Materials* would be applicable to the proposed project. The mitigation measure requires that the project sponsor ensure that any equipment containing polychlorinated biphenyls (PCBs) or di(2-ethylhexyl) phthalate (DEPH), such as fluorescent light ballasts, and any fluorescent light tubes containing mercury be removed and properly disposed of in accordance with applicable federal, state, and local laws. In addition, any other hazardous materials identified, either before or during work, shall be abated according to applicable federal, state, and local laws.

Because the existing building was constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the building. The Bay Area Air Quality Management District (BAAQMD) is responsible for regulating airborne pollutants including asbestos. Please contact BAAQMD for the 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 building. Please contact the San Francisco Department of Building Inspection (DBI) for requirements related to the demolition of buildings that may contain lead paint.

- **Geology.** The project site is located within a Seismic Hazard Zone (Liquefaction Hazard Zone likely underlain by artificial fill). Any new construction on the site is therefore subject to a mandatory Interdepartmental Project Review.<sup>3</sup> A geotechnical study prepared by a qualified consultant must be submitted with the Environmental Evaluation Application. The study should address whether the site is subject to liquefaction, and should provide recommendations for any geotechnical concerns identified in the study. In general, compliance with the building codes would avoid the potential for significant impacts related to structural damage, ground subsidence, liquefaction, landslides, and surface settlement. To assist Planning Department staff in determining whether the project would result in environmental impacts related to geology, it is recommended that you provide a copy of the geotechnical information with boring logs for the proposed project. This study will also help inform the Planning Department Archeologist of the project site's subsurface geological conditions.
- **Air Quality (AQ) Analysis.** The proposed project's 449 dwelling units exceed the Bay Area Air Quality Management District's (BAAQMD) construction screening levels for criteria air pollutants.<sup>4</sup> Therefore, an analysis of the project's criteria air pollutant emissions is likely to be required. Detailed information related to construction equipment, phasing and duration of each phase, and cubic yards of excavation shall be provided as part of the Environmental Evaluation Application.

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<sup>3</sup> San Francisco Planning Department. *Interdepartmental Project Review*. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=522>.

<sup>4</sup> BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3.

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 Control 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 also 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. The project proposes to construct new sensitive land uses (i.e., residential), which are subject to enhanced ventilation measures pursuant to Health Code Article 38. The project sponsor will be required to submit an Article 38 application to Department of Public Health (DPH) prior to the issuance of any environmental determination. Please provide a copy of the Article 38 application with the Environmental Evaluation Application.<sup>5</sup>

Equipment exhaust measures during construction will likely also be required. Detailed information related to construction equipment, phasing and duration of each phase, and cubic yards of excavation shall be provided as part of the Environmental Evaluation Application.

The project includes residential uses above 75 feet and the building and fire codes are likely to require that the project include a backup diesel generator. If the project would generate new sources of toxic air contaminants including, but not limited to, 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. Additional measures will likely be required to reduce stationary source emissions. Detailed information related to any proposed stationary sources shall be provided with the Environmental Evaluation Application. During the environmental review process, the proposed project will be reviewed to determine whether additional mitigation measures identified in the underlying area plan EIR will be required.

- **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.<sup>6</sup> The project sponsor is required to submit the completed table regarding project compliance with the identified regulations and provide project-level details in the

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<sup>5</sup> Refer to <http://www.sfdph.org/dph/eh/Air/default.asp> for more information.

<sup>6</sup> Refer to <http://sf-planning.org/index.aspx?page=1886> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

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.

- **Noise.** *Eastern Neighborhoods FEIR Noise Mitigation Measure F-1: Construction Noise* addresses requirements related to the use of pile-driving. Foundation construction methods are not known at this time. If the project involves pile driving, *Noise Mitigation Measure F-1* would apply to the proposed project. This mitigation measure requires that contractors use equipment with state-of-the-art noise shielding and muffling devices. To reduce noise and vibration impacts, sonic or vibratory sheetpile drivers, rather than impact drivers, shall be used wherever sheetpiles are needed. Project sponsors shall also require that contractors schedule pile-driving activity for times of the day that would minimize disturbance to neighbors.

*Eastern Neighborhoods FEIR Noise Mitigation Measure F-2: Construction Noise* requires that the project sponsor develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant when the environmental review of a development project determines that construction noise controls are necessary due to the nature of planned construction practices and sensitivity of proximate uses. This mitigation measure requires that a plan for such measures be submitted to DBI prior to commencing construction to ensure that maximum feasible noise attenuation will be achieved.

Based on the *Eastern Neighborhoods FEIR*, the project site is located in an area where traffic-related noise exceeds 60 dBA Ldn (a day-night averaged sound level). *Eastern Neighborhoods FEIR Noise Mitigation Measure F-3: Interior Noise Levels* requires that the project sponsor conduct a detail analysis of noise reduction requirements for new development including noise-sensitive uses located along streets with noise levels above 60 dBA (Ldn), where such development is not already subject to the California Noise Insulation Standards in Title 24 of the California Code of Regulations. *Noise Mitigation Measure F-3* would not apply to the proposed project as the project would be subject to the California Noise Insulation Standards.

*Eastern Neighborhoods FEIR Noise Mitigation Measure F-4: Siting of Noise-Sensitive Uses* is intended to reduce potential conflicts between existing noise-generating uses and new sensitive receptors. This measure would apply to the proposed project because the project includes a noise-sensitive use. *Noise Mitigation Measure F-4* requires that a noise analysis be prepared for new development including a noise-sensitive use, prior to the first project approval action. The mitigation measure requires that such an analysis include, at a minimum, a site survey to identify potential noise-generation uses within 900 feet of, and that have a direct line-of-sight to, the project site. At least one 24-hour noise measurement (with maximum noise level readings taken at least every 15 minutes) shall be included in the analysis. The analysis shall be prepared by person(s) qualified in acoustical analysis and/or engineering and shall demonstrate with reasonable certainty that Title 24 standards, where applicable, can be met, and that there are no particular circumstances about the project site that appear to warrant heightened concern about noise levels in the vicinity. Should such concerns be

present, the Planning Department may require the completion of a detailed noise assessment by person(s) qualified in acoustical analysis and/or engineering prior to the first project approval action.

*Eastern Neighborhoods FEIR Noise Mitigation Measure F-5: Siting of Noise-Generating Uses* would not apply to the proposed project because the project would not include commercial, industrial, or other uses that would be expected to generate noise levels in excess of ambient noise, either short term, at nighttime, or as a 24-hour average, in the project site vicinity.

Finally, *Eastern Neighborhoods FEIR Noise Mitigation Measure F-6: Open Space in Noisy Environments* would apply to the proposed project, as it includes new development of a noise-sensitive use. This mitigation measure requires that open space required under the Planning Code be protected from existing ambient noise levels. Implementation of this measure could involve, among other things, site design that uses the building itself to shield on-site open space from the greatest noise sources, construction of noise barriers between noise sources and open space, and appropriate use of both common and private open space in multi-family dwellings, and implementation would also be undertaken consistent with other principles of urban design.

- **Shadow Study.** The proposed project would result in construction of a building greater than 40 feet in height. A preliminary shadow fan analysis has been prepared by Planning Department staff that indicates that the proposed project would not cast new shadows on properties under the jurisdiction of the San Francisco Recreation and Park Commission. However, the proposed project could cast shadows on other recreational resources not under the jurisdiction of the Commission. As part of environmental review, the project will be assessed for its potential to cause new shadow on such resources. If this review shows that the project could cause new shadows on recreational resources, a detailed shadow study may be required.
- **Wind Study.** The proposed project would involve construction of a building over 80 feet in height. The project therefore would require 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 analysis.
- **Flooding.** The project site is in a block that has the potential to flood during storms.<sup>7</sup> Please contact Cliff Wong of the San Francisco Public Utilities Commission (SFPUC) at (415) 554-8339 regarding the requirements below. Applicants for building permits for either new construction, change of use or change of occupancy, or for major alterations or enlargements must contact the SFPUC at the beginning of the process for a review to determine whether the project would result in ground-level flooding during storms. The side sewer connection permits for such projects should be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning Department, DBI, or the Successor Agency to the San Francisco Redevelopment Agency. The SFPUC and/or its delegate (SFPD, Hydraulics Section) will review the permit application and comment on the proposed application and the potential for flooding during wet

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<sup>7</sup> San Francisco Planning Department. *Planning Bulletin, Review of Projects in Identified Areas Prone to Flooding*, April 1, 2007. Available online at: <http://ec2-50-17-237-182.compute-1.amazonaws.com/docs/PlanningProvisions/info%20sheet%20v1.3.pdf>.

weather. The permit applicant shall refer to SFPUC requirements for information required for the review of projects in flood-prone areas. Requirements may include provision of a pump station for the sewage flow, raised elevation of entryways, or special sidewalk construction and the provision of deep gutters.

- **Stormwater.** Because the proposed project would result in a ground surface disturbance of 5,000 square feet or more, it is subject to San Francisco's stormwater management requirements as outlined in the Stormwater Management Ordinance and the corresponding 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 or the Stormwater Design Guidelines, or to download instructions for the Stormwater Control Plan, go to <http://sfwater.org/sdg>.
- **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 the size of the trunk diameter, tree height, and accurate canopy drip line. Please submit a *Tree Planting and Protection Checklist* with the Environmental Evaluation Application and ensure that trees are appropriately shown on site plans.
- **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 Environmental Evaluation Application.
- **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>.

If any of the additional analyses determine that mitigation measures not identified in the area plan EIR are required to address peculiar impacts, the environmental document will be a focused initial study/mitigated negative declaration with a supporting CPE checklist. If the additional analyses identify impacts that cannot be mitigated, the environmental document will be a focused EIR with a supporting CPE checklist. A community plan exemption and a focused initial study/mitigated negative declaration can be prepared by Planning Department staff, but focused EIR with supporting CPE checklist would need to be prepared by a consultant on the Planning Department's environmental consultant pool ([http://www.sf-planning.org/ftp/files/MEA/Environmental\\_consultant\\_pool.pdf](http://www.sf-planning.org/ftp/files/MEA/Environmental_consultant_pool.pdf)).

Please see "Studies for Project inside of Adopted Plan Areas - Community Plan Fees" in the Planning Department's current *Fee Schedule for Applications*. Environmental evaluation applications are available 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. Note that the subject parcel is within the Central SoMa Plan area. The Central Corridor Draft Plan for Public Review was published in April 2013. The Central SoMa Plan process is anticipated to be completed in early 2016. The proposals in the Draft Plan are subject to change and are contingent on the eventual approval by the Planning Commission and Board of Supervisors.

1. **Rezoning.** The project site is located within the SLI (Service/Light Industrial) District. The proposed market-rate residential use is not permitted under this zoning. In order for the project to proceed, the Planning Commission and Board of Supervisors would need to approve new zoning controls for the subject parcel.

The zoning concepts included in the Central Corridor Draft Plan indicate that a reclassification to MUO (Mixed-Use Office) is being considered for the site. A mix of market-rate and affordable residential uses would be permitted in the MUO zoning district, though the proportion of affordability that would be required has not yet been set. Please see further discussion in the Preliminary Project Comments section.

2. **Height District Reclassification.** The project site is located within the 85-X and 55-X height and bulk districts. The height of the proposed project would exceed the height limit of both designations. In

order for the project to proceed, the Board of Supervisors would need to approve a Height District Reclassification for the subject parcel.

The zoning concepts published in the Central Corridor Draft Plan (April 2013) indicate that height limits of 320 feet (proposed Mid-Rise Scenario alternative) and 400 feet (proposed High-Rise Scenario alternative) are being considered for this site. These are the two scenarios being analyzed in the Central SoMa Plan EIR; however, this analysis is not an indication of which height scenario will ultimately be adopted as part of the Plan and is not a guarantee that the Planning Commission or the Board of Supervisors will approve changes to height limits. The proposed project would only conform with the High-Rise Scenario alternative. Please see further discussion in the Preliminary Project Comments section

3. **Large Project Authorization** from the Planning Commission is required per Planning Code Section 329 for the new construction of a building greater than 75 feet in height and greater than 25,000 gross square feet.
4. **Building Permit Applications** are required for the demolition of the existing structures on the subject property.
5. A **Building Permit Application** is required for the proposed new construction on the subject property.

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). 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](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.

1. **Existing Zoning/Height and Bulk.** The subject property is located within the Service/Light Industrial (SLI) Zoning District, which does not permit new residential construction except for dwelling units affordable to lower income households. It is located within 85-X and 55-X Height and Bulk districts, which do not permit the project's proposed height and bulk. *The project could not be approved under existing zoning.*
2. **Central SoMa Plan.** The subject property falls within the Central SoMa Plan area generally bounded by 2nd, 6th, Townsend and Market Streets. The Draft Central SoMa Plan (Draft Plan), published in April 2013, will be evaluated in an Environmental Impact Report (EIR). The Draft Plan proposes changes to the allowed land uses and building heights, and will include a strategy for improving the public realm in this area. The EIR, the Draft Plan, and the proposed rezoning and affiliated Code changes are anticipated to be before decision-makers for approval in early 2016.

The Draft Plan includes recommendations for new land use controls as well as new height and bulk controls for the subject property. The Draft Plan is available for download at <http://centralsoma.sfplanning.org>. *Further comments in this section of the PPA are based on the Draft Plan concepts published to date.*

3. **Land Use.** The Draft Plan recommends rezoning the subject property to the Mixed-Use Office (MUO) zoning district, in which the proposed residential and retail uses would be allowed. A key objective of the Draft Plan is to favor office development over other kinds of growth, particularly on large sites immediately accessible to mass transit, and thus the Draft Plan requires that developments on lots larger than 20,000 square feet include a substantial office component.

Based on further analysis of minimum parcel sizes necessary to support new commercial development, the threshold for requiring office development will likely be adjusted upward to 30,000 square feet, allowing the proposed mixed use residential/retail development with no office component at the project site.

4. **Urban Form: Height and Bulk.** In recognition of the desire to accommodate more growth in the area, the Draft Plan recommends two height and bulk scenarios referred to as the Mid-Rise Alternative and the High Rise Alternative. For the subject site the Mid-Rise Alternative proposes an 85P/320T height and bulk designation, which would allow a 320-foot tower and 85-foot podium, while the High-Rise Alternative proposes an 85P/400T height and bulk designation which would allow a 400-foot tower and 85-foot podium. The proposed building height would only be feasible under the High Rise Alternative.

The Draft Plan includes bulk control concepts which would restrict the gross floor area of residential floors above a height of 85 feet (the "tower" portion of the allowable building envelope) to 12,000 square feet, while the size of residential floorplates below this height (the "podium" portion of the allowable building envelope) would not be restricted. At 13,200 square feet, the floorplates of the proposed residential tower floors would exceed the maximum allowed.

In order to preserve the largely horizontal built character of Central SoMa, the Draft Plan would require 15 foot upper-floor step-backs from all property lines: at a height roughly proportional to the width of the adjacent public right-of-way at the street frontage, and at 85' adjacent to other properties. The proposed tower does not appear to step back from the 4<sup>th</sup> Street property line and may not step back sufficiently from lot 3787/028 directly to the east. See additional comments in the Additional design Comments section below.

5. **Urban Form: Tower separation.** The Draft Plan proposes similar height and bulk controls on the subject lot and on lot 3787/028 directly to the east. Similar to other areas of the city zoned for towers, the Draft Plan would also require a minimum 115' distance between towers. This minimum tower separation would apply to all buildings taller than 160', for any portion of the building above the podium height of 85'. The project sponsor is urged to carefully consider the position and shape of the proposed tower as it relates to development potential on lot 3787/028. See additional comments in the Additional design Comments section below.
6. **Urban Form: 4<sup>th</sup> Street frontage.** With the land use changes proposed in the Draft Plan and the beginning of light rail service along 4<sup>th</sup> Street, very high pedestrian volumes are anticipated along the 4<sup>th</sup> Street frontage of the project site. However, engineering constraints prevent the City from widening the existing 10-foot wide sidewalks to the 15-foot width recommended by the Better Streets Plan. Since the viability of intensive development as envisioned by the Draft Plan and reflected in the proposed project depends on a high-grade and adequate pedestrian environment, the Draft Plan requires that all development be set back at least 5 feet from the property line along 4<sup>th</sup> Street in order to widen the sidewalk. The upper floors above 25 feet from sidewalk level may extend to the property line in a column-free cantilever. The required 15 foot upper-floor step-back described in the *Urban Form: Height and Bulk* section above would be measured from the property line. See additional comments in the Additional design Comments section below.
7. **Urban Form: Open space.** The corner of Townsend and 4<sup>th</sup> Streets is the preferred location for any publically accessible open space that may be required of the project or proposed voluntarily. This busy corner will see substantial increases in pedestrian activity for which such a plaza would provide relief. As well the location is ideal for maximizing solar exposure. The project sponsor is urged to coordinate the design of any such feature with lot 3787/028 directly to the east. See additional comments in the Additional design Comments section below.
8. **Off-Street Parking.** Under current zoning (SLI) and the potential zoning under the Central SoMa planning process (MUO), no off-street parking would be required. In light of the abundance of existing and future transit in the area and the need to minimize traffic-related delays to transit service as well as conflicts with pedestrians, on-site parking should be minimized.
9. **Access to Off-Street Parking and Loading.** The Planning Code currently prohibits access to parking and loading along the 4<sup>th</sup> Street frontage of the subject lots, and requires that existing curb cuts be abandoned upon redevelopment of the site. The Draft Plan does not propose to change these controls, thus the proposed curb cuts along 4<sup>th</sup> Street could not be approved. The sponsor should investigate other possible methods to access any proposed off-street parking and loading at the site: coordinated development with lots 028 and 050 directly east of the project site to provide vehicular access from

Townsend Street, access from a new publicly-accessible alley opening onto 4<sup>th</sup> Street on the north-western boundary of the subject lot, or access from the private alley on lot 3787/052-139 directly north-west of the project site. Access to parking and loading by any of these methods must be designed so that no queuing or maneuvering associated with such access occurs on 4<sup>th</sup> Street or Townsend Street. See additional comments in the Additional design Comments section below.

10. **Eco-District.** An Eco-District is a neighborhood or district where residents, community institutions, property owners, developers, and businesses join together with City leaders and utility providers to meet sustainability goals and co-develop innovative projects at a district or block-level. The Planning Department has identified the Central SoMa Plan area as a Type 2 Eco-District. All major new development in the Plan area will be expected to participate in the Eco-District program and the Sustainability Management Association set up to guide it. Please see <http://www.sfplanning.org/index.aspx?page=3051> for more information.
11. **Interdepartmental Project Review.** An Interdepartmental Project Review is required for all new construction that is eight stories or more, or located within a seismic hazard zone. The project proposes a building that is more than eight stories and subject property is also located within a seismic hazard zone. An application is available in the Planning Department lobby at 1650 Mission Street, Suite 400 or at the Planning Information Center (PIC) at 1660 Mission Street, and online at [www.sfplanning.org](http://www.sfplanning.org).
12. **Rear Yard.** Under the current SLI zoning designation, Section 134 requires the project to provide a rear yard of at least 25 percent of the lot depth at every level that contains a dwelling unit. As proposed, the project does not appear to provide a Code complying rear yard, and would require an approved modification through the Large Project Authorization process. While such configurations can be supported, a minimum of 25 percent of the lot area is preferred.
13. **Open Space – Residential.** Under the current SLI zoning designation, Section 135 requires 36 square feet of private open space) or 48 square feet of common open space for each dwelling unit. Additionally, any such open spaces must meet the dimensional requirements of Subsections (f) and (g). Please provide detailed plans that satisfy this requirement., or you may request and justify an open space modification through the Large Project Authorization process. The Department generally would recommend providing an equivalent amount of open space.
14. **Open Space – Non-Residential.** Section 135.3 requires this project to provide one foot of open space for every 250 square feet of retail (and similar) uses. The proposal includes approximately 10,000 square feet of commercial space. Therefore, 40 square feet of open space would be required. Under the current SLI zoning designation, if the necessary open space cannot be created because of constraints of the development site, or because the project cannot provide safe, convenient access to the public, or because the square footage of open space is not sufficient to provide a usable open space, the Zoning Administrator may (i) authorize, as an eligible type of open space, a pedestrian mall or walkway within a public right-of-way which is improved with paving, landscaping, and street furniture appropriate for creating an attractive area for sitting and walking, or (ii) waive the

requirement that open space be provided upon payment to the Open Space Fund for each square foot of open space otherwise required to be provided.

15. **Street Trees.** Planning Code Section 138.1 requires one street tree for every 20 feet of frontage for new construction, with any remaining fraction of 10 feet or more of frontage requiring an additional tree. The proposed project will require eleven street trees along the 4<sup>th</sup> Street frontage. Please revise your project to meet this requirement.
16. **Exposure.** Section 140 requires that each dwelling unit have at least one room that meets 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 an appropriately sized courtyard. The proposed rear yard is not Code-complying and the units that do not front onto 4<sup>th</sup> Street do not meet the exposure requirement. Although you may request and justify an exposure exception through the Large Project Authorization process, the Department generally encourages projects to minimize the number of units needing an exposure exception.
17. **Street Frontage.** As new construction located within a South of Market Mixed Use District, the proposed project would be subject to the requirements for street frontage, as outlined in Planning Code Section 145.1 that include the requirements for active uses, ground floor ceiling heights, transparency and fenestration, among others. Please refer to Planning Code Section 145.1.
18. **Ground Floor Uses.** Be advised that under the current SLI zoning designation, active commercial uses that are identified under Table 145.4 must occupy the ground floor of the building.
19. **Shadow Impacts.** Pursuant to Section 147, new buildings that exceed a height of 50 feet shall be shaped, consistent with the dictates of good design and without unduly restricting the development potential of the site in question, to reduce substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Section 295. In determining the impact of shadows, the amount of area shadowed, the duration of the shadow, and the importance of sunlight to the type of open space being shadowed shall be taken into account.
20. **Bicycle Parking.** For buildings containing more than 100 dwelling units, Section 155.2.11 requires 100 Class 1 spaces plus one Class 1 space for every four dwelling units over 100, and one Class 2 space for every 20 dwelling units. In addition, one Class 1 space is required for every 7,500 square feet of retail occupied floor area, and one Class 2 space for every 2,500 sq. ft. of retail occupied floor area. Therefore, proposed 449 dwelling units and 10,000 square feet of retail commercial space will require a minimum of 188 Class 1 and 26 Class 2 bicycle parking spaces. Please revise your project to meet this requirement.
21. **Car Share Requirements.** Pursuant to Section 166, the proposed project will require a minimum of three, and a maximum of eight car-share parking spaces. Please revise your project to meet this requirement.

22. **Housing and Density of Dwelling Units.** Under the existing SLI zoning designation, the proposed project is not Code-complying as dwelling units may only be authorized as a conditional use if such dwellings are rented, leased or sold at rates or prices affordable to a household whose income is no greater than 80 percent of the median income for households in San Francisco ("lower income household"), as determined by Title 25 of the California Code of Regulations Section 6932 and implemented by the Mayor's Office of Housing, pursuant to Section 803.8. Additionally, Section 207.5 limits the density of dwelling units to one for each 200 square feet of lot area, or 97 units for the subject property.
23. **Inclusionary Affordable Housing.** The Draft Plan recommends rezoning the subject property to the Mixed-Use Office (MUO) zoning district, under which inclusionary affordable housing is required as part of any project constructing ten or more dwelling units. Note that the Draft Plan also recommends that where development capacity is substantially increased through rezoning, affordable housing requirements should be increased beyond the current requirements applicable in MUO districts.
24. **Housing Unit Mix.** The Draft Plan recommends that dwelling unit mix requirements applicable in the Eastern Neighborhood zoning districts be extended to the project site. These zoning districts currently require that at least 40% of new units include at least 2 bedrooms each, or alternatively that at least 30% of new units include at least 3 bedrooms each.
25. **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 new shadows on properties under the jurisdiction of the San Francisco Recreation and Park Commission.
26. **Transit Impact Development Fee.** Pursuant to Planning Code Section 411 et seq., the Transit Impact Development Fee will apply to 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>.
27. **Eastern Neighborhoods Impact Fees.** Pursuant to Section 423, the Eastern Neighborhoods Impact Fee applies to the Project and shall be assessed per net new gross square footage on residential and non-residential uses within the Plan Area. Fees shall be assessed on mixed use projects according to the gross square feet of each use in the project. The Eastern Neighborhoods Impact Fee shall be paid before the City issues a first construction document, with an option for the project sponsor to defer payment to prior to issuance of the first certificate of occupancy upon agreeing to pay a deferral surcharge in accordance with Section 107A.13.3 of the San Francisco Building Code. Note that the Draft Plan recommends additional or increased impact fees where development capacity is substantially increased through rezoning.

**Option for In-Kind Provision of Community Improvements and Fee Credits.** Project sponsors may propose to directly provide community improvements to the City. In such a case, the City may enter into an In-Kind Improvements Agreement with the sponsor and issue a fee waiver for the Eastern Neighborhoods Impact Fee from the Planning Commission. This process is further explained in Section 412.3(d) of the Planning Code

28. **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

29. **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](mailto:stormwaterreview@sfwater.org) for assistance.
30. **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 project is located within the boundary of the draft Central SoMa Plan (Draft Plan). The neighborhood currently includes two- to seven-story masonry and industrial buildings with a mix of industrial, commercial and residential uses.

The site is highly visually prominent at the corner of the Fourth and King CalTrain Station and the center of what is anticipated to be dense area of office, residential, and retail development. The site will have significant access to both regional and local rail through the convergence of both the CalTrain Station and the Central Subway which will be above ground and run along Fourth Street, in addition to the existing light rail line along King Street and numerous bus lines which converge on this location. Due to this collection of new buildings and transit infrastructure, the block and adjacent intersection will be intensively used by pedestrians. The following comments address preliminary design issues that may significantly impact the proposed project:

1. **Site Design and Open Space.** The large number of residential units proposed at the site will require a commensurately large amount of residential open space. We anticipate that the total amount of open space required could be reduced, provided that a portion of such open space is fully accessible to the public and meets guidelines for privately-owned public open space (POPOS), currently under development. These guidelines will require that most POPOS to be at grade and directly accessible from the public realm, thus we anticipate that the proposed podium-level open space will not qualify for a reduction in the overall open space requirement. The preferred location for POPOS at the project site is at sidewalk level, towards the corner of 4<sup>th</sup> and Townsend Streets. In the event that the full open space requirement cannot be met on-site even after adjustment for provision of POPOS, we anticipate working with the project sponsor further for compliance options, including off-site options and in-lieu fees.
2. **Tower Separation and Massing.** The Draft Plan proposes similar height and bulk controls on the subject lot and on lot 3787/028 directly to the east. Similar to other areas of the city zoned for towers, the Draft Plan would also require a minimum 115' separation between towers to provide adequate light and air in the neighborhood. A smaller tower separation would be considered only if the floorplates of both towers were significantly reduced (e.g. 8,500' SF) and the heights in the towers differed by at least a 50 feet.
3. **Street Frontage.** The Planning Department supports the inclusion of retail at the corner and ground floor level and encourages it to be variable in design and easily accessible. As neighborhood sidewalk widths are narrow but the pedestrian public realm use is anticipated to be dense and active, the Planning Department recommends that that project include a generous setback at the ground floor extending at least 25 feet from sidewalk level.

Curb cuts are not permitted along either Fourth or Townsend Streets thus the proposed parking and loading entries would not be allowed from Fourth Street as proposed. The Planning Department suggests that the project sponsor negotiate easement access from the property's northwest neighbor through their privately-owned alley to provide loading and garage access from the north corner of the site. Additionally, the Planning Department recommends that the building setback along this alleyway to provide the additional space required for truck movement. The use of this alley for garage and loading entrance reduces queuing that would impact Fourth Street.

Active uses are required along the street frontage; please note that building lobbies are only considered active uses as long as they do not exceed 40 feet or 25% of building frontage, whichever is larger. Please review Section 145 for acceptable active use types.

Per Planning Code Section 138.1, the project sponsor will be required to submit a Streetscape Plan illustrating the location and design of streetscape improvements appropriate to the street type, including site furnishings, landscaping, corner curb extensions, and sidewalk widening as

appropriate. The Planning Department may require these elements as part of conditions of approval. See <http://www.sfbetterstreets.org/design-guidelines/street-types/> to identify relevant street types for the project frontage.

4. **Parking.** The Planning Department recommends reducing or eliminating parking on this site as it is in a high density transit-accessible area with constrained vehicular circulation conditions.
5. **Architecture.** As the project is diagrammatic, the Planning Department does not have any comment on the proposal architecture but will provide further detailed design review on a subsequent submission.

The Planning Department recommends, however, that the project sponsors consider the prominence and visibility of the project both at the scale of the pedestrian and across the city skyline. The architecture should express a clear idea as well as a strong sense of neighborhood spirit. While the tower should be elegant and distinctive as viewed from afar, the base should include more fine-grained features to enhance the pedestrian experience. The design of the POPOS and setback space at the ground should work together and engage the interior active uses. It is expected that the architecture and quality of execution will be superior. High quality materials combined with exceptional articulation and detailing on all visible facades will be essential to a successful project.

#### 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 11, 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  
                     SFPUC Recycled Water Information Sheet

cc: Tishman Speyer, LP, Property Owner  
    Doug Vu, Current Planning  
    Elizabeth Purl, Environmental Planning  
    Amnon Ben-Pazi, Citywide Planning and Analysis  
    Maia Small, Design Review  
    Jonas Ionin, Planning Commission Secretary  
    Jerry Robbins, MTA  
    Jerry Sanguinetti, DPW



## San Francisco Public Utilities Commission Recycled Water Installation Procedures for Developers

The City and County of San Francisco (CCSF) 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 under the following circumstances:

- New or remodeled buildings and all subdivisions with a total cumulative area of 40,000 square feet or more
- New and existing irrigated areas of 10,000 square feet or more

The following are procedures to guide developers and property owners with the installation of recycled water service lines. The diagram on the reverse shows how, and where the lines are to be installed, and the required backflow prevention assembly.

### Number of Water Lines Coming onto a Property

Three to four lines:

- 1) Fire
- 2) Potable water domestic
- 3) Recycled water domestic
- 4) Recycled water irrigation (if property has landscaping)

### Number of Water Meters

One water meter is required for each water line.

### Required Backflow Prevention Assembly

Fire line – reduced pressure principle backflow preventer  
Potable water domestic – reduced pressure principle backflow preventer  
Recycled water domestic – reduced pressure principle backflow preventer  
Recycled water irrigation line – reduced pressure principle backflow preventer

All backflow prevention assemblies must be approved by the SFPUC's Water Quality Division.

The backflow prevention assembly for domestic water plumbing inside the building and for the recycled water system must meet the CCSF's Plumbing Code and Health Code.

### Pipe Separation

California Department of Public Health regulations require new water mains and new supply lines to be installed at least 4-foot horizontally from, and one-foot vertically above a parallel pipeline conveying recycled water.

### Pipe Type

- Transmission lines and mains – ductile iron
  - Distribution and service lines – purple PVC or equivalent
  - Irrigation lines – purple PVC or equivalent
  - Dual-plumbing – described in the City and County of San Francisco Plumbing Codes
- \*\*SFPUC must sign off on pipe type prior to installation.** Contact the City Distribution Division at (415) 550-4952.

### Temporary Potable Water Use Until Recycled Water Becomes Available

The potable water line will be used to feed the recycled water lines(s) until such time that recycled water becomes available. When recycled water becomes available, the cross-connection will be broken by the SFPUC, and the potable and recycled water lines will be totally separated. Before recycled water is delivered to the property, cross-connection and backflow testing will take place to assure separation.

Under no circumstances are developers or property owners to "t-off" of the potable water line to the recycled water lines(s).

### If you have questions, or would like additional information:

#### Recycled Water Ordinances and Technical Assistance

San Francisco Public Utilities Commission  
Water Resources Division  
(415) 554-3271

#### Recycled Water Plumbing Codes

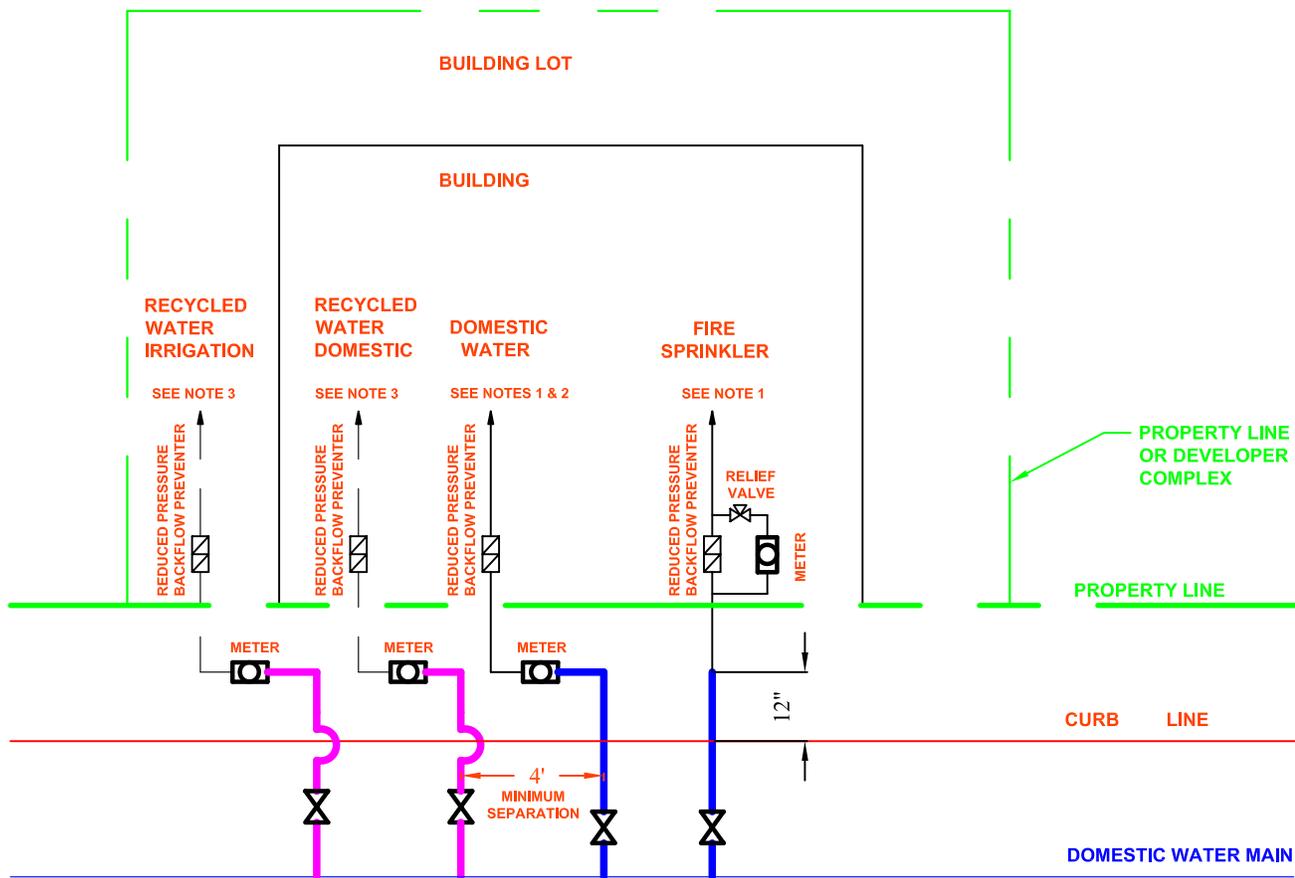
Department of Building Inspection  
Plumbing Inspection Services  
(415) 558-6054

#### Backflow Prevention

San Francisco Public Utilities Commission  
Water Quality  
(650) 652-3100

#### New Service Line Permits

San Francisco Public Utilities Commission  
Customer Services  
(415) 551-3000



**STREET - SIDE**

**NOTE:**

1. ALL BACKFLOW PREVENTERS MUST APPROVED BY SFPUC WATER QUALITY BUREAU.
2. BACKFLOW PREVENTION FOR DOMESTIC WATER PLUMBING INSIDE THE BUILDING MUST MEET CCSF PLUMBING CODE AND PUBLIC HEALTH CODE REQUIREMENTS.
3. BACKFLOW PREVENTER FOR RECYCLED WATER SYSTEM MUST MEET CCSF PLUMBING CODE AND PUBLIC HEALTH CODE REQUIREMENTS.

**RESPONSIBILITY OF INSTALLATION OF**

**HEAVY LINES:**

PROPERTY OWNER PAYS FOR NEW SERVICE INSTALLATION. SFPUC RETAINS OWNERSHIP OF NEW SERVICE UP TO THE END OF METER ASSEMBLY.

**LIGHT LINES:** & \_\_\_\_\_

PROPERTY OWNER PAYS FOR NEW SERVICE INSTALLATION. OWNERSHIP REMAINS WITH THE PROPERTY OWNER.

CITY AND COUNTY OF SAN FRANCISCO  
PUBLIC UTILITIES COMMISSION  
SAN FRANCISCO WATER DEPARTMENT

**INSTALLATION OF RECYCLED WATER SERVICE LINES**

APPROVED BY:

SCALE:

NTS

DESIGNED BY:  
Cheryl Munoz

DATE: 05/28/08

DRAWN: W.Villasica

CHECKED: M.Gardiner

DRAWING NO.  
A-1290.2  
REV. NO. 2

FIRST	LAST	TITLE	ORGANIZATION	ADDRESS	CITY	STATE	ZIP	TELEPHONE	EMAIL
Marvis	Phillips	Land Use Chair	Alliance for a Better District 6	230 Eddy Street #1206	San Francisco	CA	94102-6526	415-674-1935	marvisphillips@gmail.com
Laura	Magnani		0 American Friends Service Committee	65 Ninth Street	San Francisco	CA	94103	415-565-0201	sfoffice@afsc.org
Jane	Kim	Supervisor, District 6	Board of Supervisors	1 Dr. Carlton B Goodlett Place, Room #244	San Francisco	CA	94102-4689	415-554-7970	jane.kim@sfgov.org; April.veneracion@sfgov.org; Sunny.Angulo@sfgov.org; Ivy.Lee@sfgov.org
Ken	Baxter	Director	Citizens for Change	355 11th Street, Suite 200	San Francisco	CA	94103	415-652-9330	kbaxter26@gmail.com
Janet	Carpinelli	Board President	Dogpatch Neighborhood Association	934 Minnesota Street	San Francisco	CA	94107	415-282-5516	jc@jcarpinelli.com
Gerald	Wolf	President	Hallam Street Homeowners Association	1 Brush Place	San Francisco	CA	94103	415-626-6650	wolfgk@earthlink.net
Ian	Lewis		0 HERE Local 2	209 Golden Gate Avenue	San Francisco	CA	94102		0 0
Kaye	Griffin	Director	LMNOP Neighbors	1047 Minna Street	San Francisco	CA	94103	415-724-1953	LMNOP@yak.net
Carolyn	Diamond	Executive Director	Market Street Association	870 Market Street, Suite 456	San Francisco	CA	94102	415-362-2500	msadv@pacbell.net
Jason	Henderson	Vice Chariman	Market/Octavia Community Advisory Comm.	300 Buchanan Street, Apt. 503	San Francisco	CA	94102	415-722-0617	jhenders@sbcglobal.net
Corinne	Woods		0 Mission Creek Harbor Association	300 Channel Street, Box 10	San Francisco	CA	94158	415-902-7635	corinnewoods@cs.com
Tiffany	Bohee	Executive Director	Office of Community Investment and Infrastructure, City and County of San Francisco	1 South Van Ness Avenue, 5th Floor	San Francisco	CA	94103		0 tiffany.bohee@sfgov.org; mike.grisso@sfgov.org; courtney.pash@sfgov.org
Ethan	Hough	Secretary	One Ecker Owners Association	16 Jessie Street Unit 301	San Francisco	CA	94105	415-847-3169	ethanhough@gmail.com
Antonio	Diaz	Project Director	People Organizing to Demand Environmental and Economic Rights (PODER)	474 Valencia Street #125	San Francisco	CA	94103	415-431-4210	podersf.org
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