



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: April 14, 2014
TO: Amy Lee
FROM: Joy Navarrete, Planning Department
RE: PPA Case No. 2014.0262U for 1246 Howard Street

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

Reception:
415.558.6378

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415.558.6409

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Information:
415.558.6377

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Brett Bollinger, at (415) 575-9024 or brett.bollinger@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

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

Joy Navarrete, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: April 14, 2014
Case No.: 2014.0262U
Project Address: 1246 Howard Street
Block/Lot: 3728/017
Zoning: RED-MX (Residential Enclave-Mixed)
45-X
Area Plan: Western SoMa
Project Sponsor: Amy Lee
415-290-3051
Staff Contact: Brett Bollinger – (415) 575-9024
brett.bollinger@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 renovate an existing two-story, 2,700 square foot industrial building and construct a two-story addition and convert to a residential use building with ground floor retail. With the proposed addition, the total project would consist of a 45-foot tall mixed use building with approximately 6,000 square feet of residential uses in nine units and approximately 1,500 square feet of ground floor retail. The existing building on the subject lot was constructed in 1919.

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:

An **Environmental Evaluation Application (EEA)** is required to determine 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.

Pursuant to CEQA, this project may qualify for a Community Plan Exemption (CPE) under the *Western SoMa Community Plan, Rezoning of Adjacent Parcels and 350 Eighth Street Project Final Environmental Impact Report (Western SoMa FEIR)*. Section 15183 of the CEQA Guidelines states that projects that are consistent with the development density established by a community plan for which an environmental impact report (EIR) was certified do not require additional environmental review, except as necessary to determine the presence of project-specific significant effects not identified in the programmatic plan area EIR. 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 Western SoMa FEIR*, 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 *Western SoMa 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 \$13,339); (b) the CPE certificate fee (currently \$7,402); and (c) a proportionate share fee for recovery for costs incurred by the Planning Department for preparation of *the Western SoMa FEIR*.

2. CPE + Mitigated Negative Declaration

If new site- or project-specific significant impacts are identified for the proposed project that were not identified in *the Western SoMa FEIR*, 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 certificate is prepared to address all other impacts that were encompassed by *the Western SoMa FEIR*, with all pertinent mitigation measures and CEQA findings from *the Western SoMa FEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,339); (b) the standard environmental evaluation fee (which is based on construction value); and (c) a proportionate share fee for recovery for costs incurred by the Planning Department for preparation of *the Western SoMa FEIR*.

3. CPE + 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 certificate is prepared to address all other impacts that were encompassed by *the Western SoMa FEIR*, with all pertinent mitigation measures and CEQA findings from *the Western SoMa FEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,339); (b) the standard environmental evaluation fee (which is based on construction value); (c)

one-half of the standard EIR fee (which is also based on construction value); and (d) a proportionate share fee for recovery for costs incurred by the Planning Department for preparation of *the Western SoMa FEIR*.

The project initially requires the following environmental review. This 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.

- 1. Historic Architectural Resources:** The project site contains an existing industrial building that was constructed in 1919. The building was included in the South of Market Historical Informational Survey, and was given a rating of 3D, which defines the property as "Appears eligible for National Register as a contributor to a National Register eligible district through survey evaluation." As such, the subject property would be considered a historic resource pursuant to California Environmental Quality Act (CEQA). Therefore, the proposed project would be subject to additional historic resource review to assess whether the proposed addition would have an impact on the historic resource on the subject lot, South of Market District and nearby historic buildings. This review will require preparation of a Historic Resource Evaluation (HRE) by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards. Upon submittal of the EEA, the Department will provide a list of three historic resource consultants from the Historic Resource Consultant Pool. Once the EEA is submitted and an environmental case number is assigned, 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 HRE should be prepared in consultation with Department Preservation staff.
- 2. Archeological Resources:** Project implementation would entail soil-disturbing activities associated with building construction including excavation, grading, and foundation work that would reach a depth of approximately five feet below grade. The *Western SoMa FEIR* identified the potential for project-specific significant impacts on archeological resources resulting from ground-disturbing activities in the Plan area. *Western SoMa FEIR Mitigation Measure M-CP-4a: Project-Specific Preliminary Archeological Assessment* would apply to the proposed project. This measure applies to any project involving any soils-disturbing activities including excavation, utilities installation, grading, soils remediation, compaction/chemical grouting to a depth of five feet or greater below ground surface in the *Western SoMa Community Plan* area for which no archeological assessment report has been prepared. Projects to which this mitigation measure applies are subject to Preliminary Archeology Review (PAR) or a Preliminary Archeological Sensitivity Study (PASS) by the San Francisco Planning Department archeologist. Based on the PAR or PASS, the Environmental Review Officer (ERO) shall determine if an Archeological Research Design Treatment Plan (ARDTP) shall be required to more definitively identify the potential for California Register-eligible archeological resources to be present within the project site and determine the appropriate action necessary to reduce the potential effect of the project site on archeological resources to a less-than-significant level. If required, the ARDTP shall be prepared by a qualified archeological consultant selected from a list of three archeological consultants from the Planning Department's archeological resources consultant pool provided by the

Planning Department during the environmental review.¹ The Planning Department Archeologist will be informed by the geotechnical study of the project site's subsurface geological conditions.

In addition, *Western SoMa FEIR Mitigation Measure M-CP-4b: Procedures for Accidental Discovery of Archeological Resources* would apply to the proposed project. This measure is intended to avoid any potential adverse effect on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c). This mitigation measure requires the project sponsor to distribute the San Francisco Planning Department archeological resource "ALERT" sheet to on-site construction workers, suspend any project-related soils-disturbing activities when an archeological resource is encountered, and notify the ERO of an archeological resource encountered during soils-disturbing activities.

3. **Noise:** *The Western SoMa FEIR* identified a number of noise mitigation measures to address significant impacts resulting from construction activity associated with development in the Plan area. *Western SoMa FEIR Mitigation Measure M-NO-1a: Interior Noise Levels for Residential Uses* would not apply to the proposed project because the proposed project would be subject to the California Noise Insulation Standards in Title 24 of the California Code of Regulations. The measure requires new development including noise-sensitive uses located along streets with noise levels above 60 dBA Ldn (a day-night averaged sound level), where such development is not already subject to the California Noise Insulation Standards.

The proposed project would introduce a noise-sensitive use (i.e., residential) to the project site and, therefore, would be subject to *Western SoMa FEIR Mitigation Measure M-NO-1b: Siting of Noise-Sensitive Uses*. The measure requires the Planning Department to require the preparation of a noise analysis, prepared by persons qualified in acoustical analysis and/or engineering, for projects that include residential and other noise-sensitive uses. The noise study shall include, at a minimum, a site survey to identify potential noise-generating uses within 900 feet of, and that have a direct line-of-sight to the project site, and include at least one 24-hour noise measurement (with average and maximum noise level readings taken so as to be able to accurately describe maximum level reached during nighttime hours) prior to the first project approval action. The analysis shall demonstrate with reasonable certainty that Title 24 standards, where applicable, can be met, and that there are no particular circumstances about the individual project site that appear to warrant heightened concern about noise levels in the vicinity. Should the Planning Department conclude that such concerns be present, the Planning Department would 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.

Western SoMa FEIR Mitigation Measures M-NO-1c: Siting of Noise-Generating Uses may apply to the proposed project because the proposed project would introduce new commercial/retail spaces that could generate noise levels in excess of ambient noise. The measure requires the Planning Department to require the preparation of a noise analysis for new development including commercial, industrial, or other uses that would be expected to generate noise levels in excess of ambient noise.

¹ San Francisco Planning Department. *Consultant Resources, Archeological Review Consultant Pool*. Available online at: <http://www.sf-planning.org/index.aspx?page=1886>.

Western SoMa FEIR Mitigation Measure M-NO-1d: Open Space in Noisy Environments specifies that Planning Code-required open space should be protected from noise-generating uses. The proposed project would provide 8,234 sf of new open space requiring site-specific noise attenuation measures that comply with urban design guidelines. Therefore, *Mitigation Measure M-NO-1d* would apply to the proposed project.

Western SoMa FEIR Mitigation Measure M-NO-2a: General Construction Noise Control Measures would apply to the proposed project. Mitigation Measure M-NO-2a requires that development projects in the *Western SoMa Community Plan* area undertake noise attenuation measures to ensure that project noise from construction activities is minimized to the maximum extent feasible. In addition, *Western SoMa FEIR Mitigation Measure M-NO-2b: Noise Control Measures During Pile Driving* would apply to the proposed project if the project requires pile driving. *Mitigation Measure M-NO-2b* would require that a set of site-specific noise attenuation measures be completed under the supervision of a qualified acoustical consultant for projects that require pile driving.

4. **Air Quality:** The proposed project's nine dwelling units and 1,500 square feet of retail space does not exceed the Bay Area Air Quality Management District's (BAAQMD) construction screening levels for criteria air pollutants.² Therefore an analysis of the project's criteria air pollutant emissions is not 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 EEA.

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

In addition, San Francisco has partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed "Air Pollutant Exposure Zones," were identified. Land use projects within these Air Pollutant Exposure Zones require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations. The proposed project is within an Air Pollutant Exposure Zone and includes sensitive land uses (i.e., residential dwelling units). Therefore, exhaust measures during construction, such as those listed in *Western SoMa FEIR Mitigation Measure M-AQ-6, Construction Emissions Minimization Plan for Criteria Air Pollutants*, and enhanced ventilation measures during operation will likely be required. Enhanced ventilation measures will be the same as those required for projects, such as this project, subject to Article 38 of the Health Code.³

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

³ Refer to <http://www.sfdph.org/dph/ch/Air/default.asp> for more information.

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. Given the proposed project's height of 45 feet, the proposed project would not likely require a backup diesel generator and additional measures, such as that described in *Mitigation Measure M-AQ-4, Siting of Uses that Emit DPM or PM_{2.5} and other TACs*, will not likely be necessary to reduce its emissions. Detailed information related to any proposed stationary sources shall be provided with the EEA.

5. **Greenhouse Gases:** Potential environmental effects related to greenhouse gas ("GHG") emissions from the revised project need to be addressed in a project's environmental evaluation. The project sponsor would be required to submit a completed GHG Compliance Checklist Table 1 for Private Development Projects demonstrating that the project is in compliance with the identified regulations and provide project-level details in the discussion column. An electronic version of the Greenhouse Gas Compliance Checklist Table 1 for Private Development Projects is available on the Planning Department's website at <http://ww.sfplanning.org/index.aspx?page=1886>. 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.⁴ Projects that do not comply with a GHG-related regulation may be determined to be inconsistent with San Francisco's Greenhouse Gas Reduction Strategy.
6. **Shadow:** Planning Code Section 295 restricts new shadowing on public spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet, unless the Planning Commission finds the impact to be less than significant. The proposed project would result in construction of a building up to 45 feet in height. The Planning Department conducted a preliminary shadow fan analysis and determined that the proposed project would not cast new shadow on public spaces protected under Section 295. Therefore, further shadow analysis will not be required for this project.⁵
7. **Geology:** The project site is located in a liquefaction hazard zone, as identified in the *San Francisco General Plan*. Please include a geotechnical report with the EEA package. The geotechnical investigation will assist the Planning Department's archeological review (see Archeological Resources section above).
8. **Floodplain:** The project site is on a block that has the potential to flood during storms. Contact Cliff Wong of the 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 shall be referred to 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 need to be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning Department, the DBI, or the Redevelopment Agency. The SFPUC and/or its delegate (SFDPW, Hydraulics Section) will review the permit application and comment on the proposed application and the potential for

⁴ City and County of San Francisco. Strategies to Address Greenhouse Gas Emissions. Available online at: http://sfmea.sfplanning.org/GHG_Reduction_Strategy.pdf

⁵ Jeffrey Speirs, *Preliminary Shadow Analysis for 1246 Howard Street, San Francisco, California, April 10, 2014*. This document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File 2014.0262U

flooding during wet weather. The permit applicant shall refer to PUC 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, and/or special sidewalk construction and the provision of deep gutters.

9. **Hazardous Materials:** The *Western SoMa FEIR* identified significant impacts related to accidental release of hazardous materials, i.e. mercury or polychlorinated biphenyls (PCBs). The proposed alteration and addition to the existing industrial building poses the risk of accidentally releasing PCBs and mercury. Therefore the proposed project would be subject to *Western SoMa FEIR Mitigation Measure M-HZ-2 Hazardous Building Materials Abatement*. This mitigation measure ensures the proper removal and handling of equipment that contain mercury or PCBs prior to building renovation or demolition. Implementation of the mitigation measure would reduce the indirect impact associated with potential PCB and mercury exposure.

Existing environmental hazards at the project site and the potential for hazardous materials contamination from past industrial uses on the site would need to be reviewed. The proposed project is located within the Maher zone and would change uses from industrial to residential. Therefore, the proposed project is subject to San Francisco Health Code Article 22A, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by DPH, requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, soil and/or groundwater sampling and analysis, as well as remediation of any site contamination, may be required. These steps are required to be completed prior to the issuance of any building permit.

DPH requires that sponsors of projects subject to the Maher Ordinance complete a Maher application, available at: <http://www.sfdph.org/dph/EH/HazWaste/hazWasteSiteMitigation.asp>. DPH fees for their 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 EEA.

10. **Tree Planting and Protection Checklist:** The DPW Code Section 8.02-8.11 requires disclosure and protection of landmark, significant, and street trees located on private and public property. Any tree identified in the Tree Planting and Protection Checklist must be shown on the Site Plans with size of the trunk diameter, tree height and accurate canopy drip line. The project sponsor is required to submit a completed Tree Planting and Protection Checklist with the EEA.
11. **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 labels upon request during the environmental review process.

If any of the above investigations determine that mitigation measures not identified in the *Western SoMa FEIR* are required to address project-specific impacts not identified in the FEIR, the environmental

document will be a CPE plus a focused IS/MND. If the additional analyses identify impacts that cannot be mitigated, the environmental document will be a CPE with a focused EIR. A CPE plus a focused IS/MND can be prepared by Planning Department staff, but a CPE with a focused EIR would need to be prepared by a consultant on the Planning Department's environmental consultant pool (http://www.sfplanning.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.

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.

- A **Building Permit Application** is required for the addition to the existing building on the subject property.

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 impact the proposed project. For the purpose of providing these comments, the ground floor units along Clara Street are considered non-residential. Designation of these units as residential may alter some of the comments below.

1. **Conformance with the Western SoMa Plan.** The project is within the Western SoMa Plan Area. As proposed, the project is generally consistent with the Plan by (1) providing housing in areas where the Plan supports housing, (2) being within the height limits adopted by the Plan, (3) supporting car-free living in Western SoMa, and (4) support an active first floor use.
2. **Rear Yard.** Planning Code Section 134 outlines the requirements for a rear yard within the RED-MX Zoning District. The minimum rear yard depth shall be equal to 25 percent of the total depth of the

lot and in no case less than 15 ft. The rear yard shall be provided at the lowest story containing a residential dwelling unit. Currently, the proposed project does not meet this requirement. Please seek and justify a Variance. However, as the project proposes residential units, the Planning Department suggests including a code complying rear yard for the project.

3. **Open Space-Residential.** Section 135 requires 80 square feet of open space (private or common) for each dwelling unit. Additionally, any such open spaces must meet the dimensional requirements of Subsections (f) and (g). In the Western SOMA Special Use District, roof decks shall not qualify as required private or common useable open space. Proposed plans do not provide sufficient open space for units 4-7. Please seek and justify a Variance.
4. **Exposure.** Planning Code Section 140 requires that all dwelling units have at least one room, with a minimum area of 120-square-feet, with a window of at least 10-square-feet that faces onto an open area. As currently proposed, the rear units do not meet this requirement. Please revise the plans or submit and justify an Exposure Variance
5. **Street Trees.** Planning Code Section 138.1 requires one street tree for every 20 feet of frontage for projects adding 20% gross floor area. No street trees are shown on the plans.
6. **Bicycle Parking.** Planning Code Section 155.2 outlines requirements for bicycle parking for residential developments of four dwelling units or more, which require one Class 1 space for every dwelling unit. Based upon the current project description, the project is required to provide at least nine (9) Class 1 bicycle parking spaces. Please specify how the project will meet this requirement. Also, please reference Planning Code Section 155.1(b)(1) for location standards of Class 1 spaces.
7. **Bird Safety.** All feature-related hazards shall be subject to the requirements of Planning Code Section 139(c)(2).
8. **Dwelling Unit Mix.** Planning Code Section 207.6 outlines the requirements for minimum dwelling unit mix for new residential properties within an Eastern Neighborhoods Zoning District. The project must provide either: no less than 40 percent of the total number of proposed dwellings units as at least two bedroom units; or no less than 30 percent of the total number of proposed dwelling units as at least three bedroom units. A future submittal may demonstrate compliance with the requirement.
9. **Retail.** Per Planning Code Section 847.32, a Conditional Use Application is required for new Retail Sales and Service uses, as defined by Planning Code Section 890.104, in a historic building. The subject building is a historic resource, and the project is proposing Retail on the ground floor; thus, the project is subject to this requirement. Alternatively, uses defined as Other Retail Sales and Services in Planning Code Section 890.102 are permitted up to 1,250 square feet of gross floor area, per Planning Code Section 847.34-36.
10. **Eastern Neighborhoods Impact Fees.** This project is subject to the applicable fees outlined in Section 423 et seq.

11. **Neighborhood Notification Materials.** This project is subject to neighborhood notification as required by Planning Code Section 312.
12. **Flood Notification.** The project site is located in a flood-prone area. Please see the attached bulletin regarding review of the project by the San Francisco Public Utilities Commission.

PRELIMINARY DESIGN COMMENTS:

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

1. **Site Design, Open Space, and Massing.** Converting interior space of the existing building to outdoor terraces at the second floor is not recommended. The Planning Department would prefer the existing windows and building form to remain.

Align the 3rd and 4th floors so that they are in the same plane and setback the addition 15' to 20' from the front of to preserve the visual volume of the existing building and to provide a clear distinction between old and new.

The residential addition should be to setback minimum of 15' at the rear to provide a minimum required rear yard area per code.

Verify the location and use of light wells on the adjacent building to the east. Provide matching light wells.

2. **Vehicle Circulation, Access and Parking.** Bike Parking is not shown.
3. **Architecture.** The Planning Department recommends the addition and the new storefront system respond to the existing utilitarian aesthetic found along Howard Street, and suggests the addition express similar scale and material qualities as those found on the existing building or on nearby buildings.

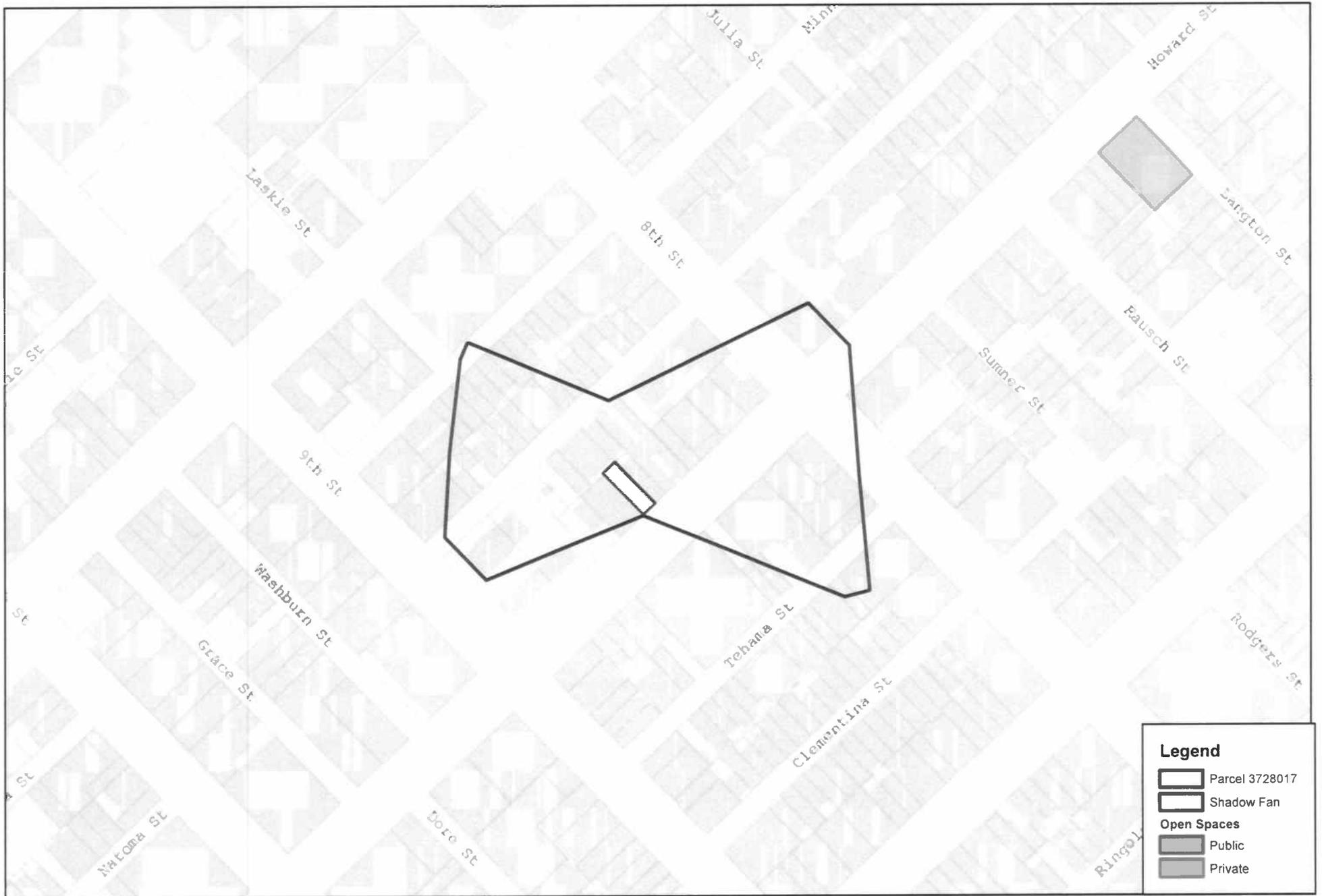
At this point the architecture is assumed to be preliminary and the Planning Department will provide further detailed design review on the subsequent submission of materials and details to insure that a high quality design is achieved.

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 the success of approval of this project.

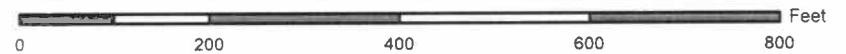
PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation or Building Permit Application, as listed above, must be submitted no later than **October 15, 2015**. 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: Amy Lee, Project Sponsor



Title: 1246 Howard Street Shadow Analysis
 Comments: Analyzed as Full Lot Coverage, 45' Height Limit with 10' Permitted Height Obstruction, with Slope.
 Printed: 10 April, 2014



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