



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: March 24, 2015
TO: University of San Francisco, c/o Harry O'Brien
FROM: David Lindsay, Planning Department
RE: PPA Case No. 2015-000058PPA for 2500 - 2698 Turk Street


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

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415.558.6378

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Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Mary Woods, at (415) 558-6315 or mary.woods@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.



David Lindsay, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: March 24, 2015
Case No.: **2015-000058PPA**
Project Address: 2500 - 2698 Turk Street
Block/Lot: 1107/008
Zoning: RH-2 (Residential, House, Two-Family) District
40-X Height and Bulk District
Area Plan: Not Applicable
Project Sponsor: University of San Francisco
c/o Harry O'Brien
Coblentz, Patch, Duffy & Bass, LLP
(415) 772-5723
Staff Contact: Mary Woods – (415) 558-6315
mary.woods@sfgov.org

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DISCLAIMERS:

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

PROJECT DESCRIPTION:

The proposal is to demolish the existing one-story buildings at the Underhill site, 107 parking spaces in the Loyola parking lot, and two tennis courts. In the same general location, the proposal is to construct two new buildings, ranging from two to four stories, connected by an elevated walkway, for student group housing containing approximately 566 beds provided in approximately 351 bedrooms/dorm rooms, five dwelling units for ministers and administrators, 190 vehicle parking spaces and 123 bicycle parking spaces in two levels of an underground parking garage, approximately 14,000 square feet of administrative and common areas, and approximately 2,000 square feet of program space or two classrooms.

The student housing component would total approximately 133,600 square feet, not including 12,000 square feet of circulation space. In addition, 2,350 square feet of space would be allocated to the four 1-

bedroom units for the Resident Ministers and Assistant Resident Directors and the 2-bedroom unit for the Resident Director. 566 student beds are proposed, of which, twelve would be for Resident Advisors. All of the student housing (provided in the form of group housing) would be four-bed configurations, in a combination of two- and three-bedroom "suites" (53.6% and 46.4%, respectively). This translates into 351 total bedrooms. The project would total approximately 237,000 gross square feet.

ENVIRONMENTAL REVIEW:

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 12/23/14.

- **Historic Resource Evaluation (HRE).** The proposed project consists of alteration or demolition of a potential historic resource (building constructed 50 or more years ago). Therefore, the project is subject to the Department's Historic Preservation review, which would include preparation of an Historic Resource Evaluation (HRE) by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards. The department will provide the project sponsor with a list of three consultants from the Historic Resource Consultant Pool. Once the Environmental Evaluation Application is submitted, please contact Tina Tam, Senior Preservation Planner, via email (tina.tam@sfgov.org) for the list of three consultants. Upon selection of the historic resource consultant, the scope of the Historic Resource Evaluation shall be prepared in consultation with Department Preservation staff.
- **Archeological Resources.** The proposed project would require Preliminary Archeological Review (PAR) by a Planning Department archeologist. The Department archeologist will determine on the basis of the archeological sensitivity of the project site based on in-house source material and of potential soils disturbance/modification that may result from the project, such as, excavation, installation of foundations, soils improvement, site remediation, etc. the potential for the proposed project to affect archeological deposits. The Department archeologist will need to review any available geotechnical/soils or phase II hazardous materials report prepared for the project. In those instances where the Department archeologist determines that the project has a potential to affect an archeological resource, the PAR will state what additional measures are needed to address the potential effects. These measures may include preparation of an archeological research design and treatment plan or implementation of one of the Planning Department three standard archeological mitigation measures (archeological testing, monitoring, accidental discovery) or other measure as deemed warranted.

- **Geology, Soils, and Seismicity.** Based on a review of the Planning Department's geographic information system, the project appears to involve excavation and construction within a mapped landslide area and on slopes of 20% or greater. Therefore, submittal of a geotechnical report would be required along with the application for environmental review.
- **Transportation Study.** In order to determine whether a Transportation Impact Study is required, the Planning Department requests that the following information be submitted along with the environmental evaluation application (if not already submitted):
 - a. Times that faculty and/or staff would be arriving and departing the new parking garages.
 - b. Full size 11" x 17" plans of the new buildings.
 - c. Plans showing compliance with Planning Code Sections 155.2.11 and 155.2.12 relating to Class 1 and Class 2 bicycle parking space requirements.
- **Air Quality (AQ) Analysis.** The proposed project's 351 dorm rooms (in two separate buildings) exceed the Bay Area Air Quality Management District's (BAAQMD) construction and operational screening levels for criteria air pollutants.¹ 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.

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

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. Please provide detailed information related to any proposed stationary sources with the Environmental Evaluation Application.

- **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.² The project sponsor is required to submit the completed table

¹ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3.

² Refer to <http://sf-planning.org/index.aspx?page=1886> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

regarding project compliance with the identified regulations and provide project-level details in the discussion column. This information will be reviewed by the environmental planner during the environmental review process to determine if the project would comply with San Francisco's Greenhouse Gas Reduction Strategy. Projects that do not comply with an ordinance or regulation may be determined to be inconsistent with the Greenhouse Gas Reduction Strategy.

- **Noise.** The Planning Department's noise maps indicate that existing ambient noise levels where the new student housing would be built are at or below 60 decibels L_{dn} (day/night weighted noise levels). The Land Use Compatibility Chart for Community Noise in the San Francisco General Plan, Environmental Protection Element, states that new construction or development for residential uses in areas where the ambient noise level exceeds 60 decibels should only be undertaken after a detailed analysis of noise reduction requirements is made and needed noise insulation features are included in the design. Given that existing noise levels at the location of the proposed new student housing are at or below 60 decibels, a detailed analysis of noise reduction requirements would not be required for purposes of CEQA review. Nevertheless, the project would be subject to compliance with the California Noise Insulation Standards found in Title 24 of the California Code of Regulations (Title 24), as administered by the Department of Building Inspection (DBI) as part of the Building Permit Application process.
- **Stormwater.** Because the proposed project would result in a ground surface disturbance of 5,000 sf 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>.

PLANNING DEPARTMENT APPROVALS:

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

1. **Conditional Use Authorization/Planned Unit Development (PUD)** from the Planning Commission is required per Planning Code Sections 303 and 304. A PUD is allowed for a lot area exceeding one-half acre pursuant to the authorization of a Conditional Use. The subject site is approximately 18 acres. The procedures for PUDs are intended for projects on sites of considerable size, developed as integrated units and designed to produce an environment of stable and desirable character which will benefit the occupants, the neighborhood and the City as a whole. In cases of outstanding overall design, complementary to the design and values of the surrounding area, such a project may merit a well-reasoned modification of certain provisions contained elsewhere in the Planning Code.
2. A **Demolition Permit Application** is required for the demolition of the existing buildings on the subject property.
3. A **Building Permit Application** is required for the proposed new construction on the subject property.

Conditional Use Authorization applications are available in the Planning Department lobby at 1650 Mission Street Suite 400, at the Planning Information Center at 1660 Mission Street, and online at www.sfplanning.org. Building Permit applications are available at the Department of Building Inspections at 1660 Mission Street.

NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

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

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

PRELIMINARY PROJECT COMMENTS:

The following comments address specific Planning Code and other general issues that may significantly 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. **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

2. **Interdepartmental Project Review.** This review is required for all proposed new construction in seismic hazard zones, in which the subject property falls. Interdepartmental Project Review 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 under the "Permits & Zoning" tab.
3. **Rear Yard.** Planning Code Section 134 requires the project to provide a rear yard of at least 45 percent of the lot depth on which the building is situated. Section 134(c)(4)(B) reduces this requirement to 25 percent of the lot depth where the subject lot abuts properties that front on another street or alley. The submitted plans are not to scale or dimensioned; therefore, the rear yard requirement could not be determined. If the project does not meet this requirement, a PUD modification for rear yard would

be necessary. The Department generally encourages projects to meet the minimum rear yard requirement.

4. **Open Space for Dwelling Units and Group Housing.** Planning Code Section 135 requires 125 square feet of private usable open space per dwelling unit or group housing unit. Common usable open space can be substituted for private usable open space at a ratio of 1.33. However, for dwelling units and group housing units, minimum open space requirements may be adjusted for units that do not exceed 350 square feet plus a bathroom per Subsection (d)(2). Additionally, any such open spaces must meet the dimensional requirements of Subsections (f) and (g). The project would require approximately 15,000 square feet of private open space, or approximately 16,000 square feet of common open space. If the project does not meet this requirement, a PUD modification for usable open space would be necessary. The Department generally would recommend providing an equivalent amount of open space.
5. **Street trees.** Planning Code Section 138.1 requires one street tree for every 20 feet of frontage for new construction, with an additional tree required for every remaining 10 feet of street frontage. The submitted plans do not show which trees exist and which are new.
6. **Tree Planting and Protection.** Completion of a tree planting and protection checklist is required. No permit will be approved by the Planning Department before satisfying all applicable tree-related requirements. Before any application is made to the Planning Department, you may choose to go directly to the Department of Public Works (DPW) to determine whether or not the required trees mentioned above can feasibly be planted. In order to do this, you should bring to DPW: (1) a completed Tree Planting and Protection Checklist [this need NOT be signed by Planning Department staff]; (2) project plans [11"x17" is acceptable]; and (3) a DPW tree planting application. Submittals can be made to DPW's offices at 1155 Market Street or electronically at www.sfdpw.org -> "Services A-Z" -> "Trees". After DPW does their analysis and fieldwork, DPW will provide you with a signed referral form with their determination which should then be provided to the Planning Department. Prior to permit approval, you will need to obtain a street tree removal permit from the Bureau of Urban Forestry for the removal of any street tree.
7. **Standards for Bird-Safe Buildings.** Planning Code Section 139 establishes the Bird-Safe Standards for building façade replacements to reduce bird mortality from circumstances that are known to pose a high risk to birds and are considered to be "bird hazards." The two circumstances regulated by this Section are (1) location-related hazards, where the siting of a structure creates increased risk to birds and (2) feature-related hazards, which may create increased risk to birds regardless of where the structure is located. Location-related hazards are created by structures that are near or adjacent to large open spaces and/or water. The subject property is within 300 feet of Golden Gate Park. Feature-related hazards include free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet and larger in size. Any structure that contains these elements shall treat 100% of the glazing on Feature-Specific hazards. Subsequent plan submissions should confirm that any feature-related hazards are appropriately treated to meet the requirements of Planning Code Section 139. The Standards for Bird-Safe Buildings

