



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

DATE: June 12, 2015  
TO: John Glaub, Recology  
FROM: Tania Sheyner, Planning Department  
RE: PPA Case No. 2015-003245PPA for 501 Tunnel Avenue

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

Reception:  
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Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Tania Sheyner, at (415) 575-9127 or [Tania.Sheyner@sfgov.org](mailto:Tania.Sheyner@sfgov.org), to answer any questions you may have, or to schedule a follow-up meeting.

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

Rick Cooper, Senior Planner



# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Project Assessment

*Date:* June 12, 2015  
*Case No.:* 2015-003245 PPA  
*Project Address:* 501 Tunnel Avenue (Recology)  
*Block/Lot:* 4991/007, 008, 009, 082; 5091/010, 011; 5099/002; 5104/001, 004  
*Zoning:* M-1 (Light Manufacturing) & M-2 (Heavy Manufacturing) Zoning Districts  
40-X Height and Bulk District  
*Area Plan:* n/a  
*Project Sponsor:* John Glaub, Recology  
415-715-6203  
*Staff Contact:* Tania Sheyner – 415-575-9127  
[tania.sheyner@sfgov.org](mailto:tania.sheyner@sfgov.org)

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### DISCLAIMERS:

This Preliminary Project Assessment (PPA) letter provides feedback to the project sponsor from the Planning Department regarding the proposed project described in the PPA application submitted on March 16, 2015, as summarized below. This PPA letter identifies Planning Department review requirements for the proposed project, including those related to environmental review, approvals, neighborhood notification and public outreach, the Planning Code, project design, and other general issues of concern for the project. Please be advised that the PPA application does not constitute an application for development with the Planning Department. The PPA letter also does not represent a complete review of the proposed project, does not grant a project approval of any kind, and does not 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, Public Works, the Municipal Transportation Agency, Department of Public Health, San Francisco Public Utilities Commission, and others. The information included herein is based on the PPA application and plans, the Planning Code, General Plan, Planning Department policies, and local/state/federal regulations as of the date of this document, all of which are subject to change.

### PROJECT DESCRIPTION:

The project site is located in the Visitacion Valley neighborhood of San Francisco and extends south of the boundary between the City and County of San Francisco and the City of Brisbane. The Project Sponsor, Recology, proposes to undertake a comprehensive redevelopment of the project site, which would include renovation, adaptive reuse, or replacement of most of the existing buildings on the site with new recycling and recovery facilities, maintenance facilities, administrative offices, and support operations

buildings. The proposed project would retain approximately 107,000 square feet (sf) of existing industrial uses in two buildings, and would also construct approximately 51,000 sf of office uses, approximately 560,000 sf of industrial uses, and approximately 252,000 sf of parking, for a total addition of approximately 863,000 sf to the project site (a total of approximately 970,000 sf of uses, including those being retained). Recology would construct 15 buildings and structures to accommodate the proposed project, which would range in height from 40 to 110 feet. On the San Francisco portion of the site, the project would construct approximately 90,000 sf of space dedicated to operations, an approximately 26,000-sf of visitor center; approximately 25,000 sf of administrative space; and a 72,000-sf parking structure.

The proposed project, which would be constructed in two phases, would provide new infrastructure for managing the City of San Francisco's solid waste stream, with the goal of reaching a waste diversion rate of 100 percent by 2020. The City of Brisbane is serving as the lead agency for the project, with San Francisco acting as a responsible agency.

#### **ENVIRONMENTAL REVIEW:**

On September 30, 2013, the City of Brisbane (San Mateo County) and the City and County of San Francisco signed an agreement whereby the two parties agreed to cooperate in environmental review of the proposed project (2013 Agreement). This agreement states that, because the City of Brisbane has the greatest regulatory responsibility for supervising and approving the proposed project as a whole (since the majority of the project site is within the City of Brisbane), the City of Brisbane will act as lead agency for the proposed project for the purposes of environmental review under CEQA. It is further stated in the 2013 Agreement that San Francisco will act as a responsible agency, and, subject to its responsibilities under CEQA Guidelines Section 15052 and 15096, would rely on the Final Environmental Impact Report (EIR) that is being prepared and that will be certified by the City of Brisbane. In that capacity, and pursuant to the 2013 Agreement, the San Francisco Planning Department looks forward to coordinating with the City of Brisbane regarding the scope and contents of the EIR and background technical reports. San Francisco Planning Department staff intends to provide input for and participate in the review of the Draft EIR sections in a timely fashion, so as to facilitate the timely processing of the EIR for the proposed project.

In order to begin the formal environmental review process, please submit an updated **Environmental Evaluation Application (EEA)** that reflects all revisions to the proposed project as compared to the EEA that was submitted to the Planning Department in 2013. The environmental review may be conducted in conjunction with the required approvals listed below, but must be completed before any discretionary project approval may be granted. **Note that until an entitlement application is submitted to the Current Planning Division, only the proposed Project Description will be reviewed by the assigned environmental Coordinator.** 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 studies, with a focus on the environmental topics that are of particular interest to the City of San Francisco. These comments are based on the preliminary review of the project as characterized in the Preliminary Project Assessment (PPA) submittal dated March 16, 2015. As noted for several environmental topics below – namely, historic resources,

transportation, air quality, noise, and greenhouse gas emissions - we recommend that EIR preparers coordinate with San Francisco Planning Department technical staff on preparing detailed scopes of work for these background studies as well as provide Planning Department staff with opportunities to review and comment on the administrative drafts of those reports.

1. **Historic Resource Evaluation (HRE).** The project site contains one or more structures considered to be a potential historic resource (building constructed 45 or more years ago). A Mitigated Negative Declaration completed in 2009 (Planning Case No. 2009.0311E) for a previous project on the site did not address historic resources and therefore, the proposed alteration or demolition is subject to review by the Department's Historic Preservation staff. Planning Department's Historic Preservation staff has reviewed the proposed scope of work (SOW) for the Cultural Resources Survey Report and is generally in agreement with the approach outlined therein. The staff recommends, however, that a task be added to the SOW stating that the EIR preparers will also conduct a district analysis of the project site to determine whether the buildings and structures within the Recology campus comprise a historical district (no assessment of the surrounding neighborhood beyond the Recology Facility borders is required). Planning Department's Historic Preservation staff also recommends that the historic resource consultant submit the draft HRE report for review to Environmental Planning after the project sponsor has filed the EEA.
2. **Archeological Resources.** Project construction would result in soil-disturbing activities. Although the depth of such activities was not specified in the PPA application, to accommodate basement and foundations construction for the proposed structures located within the City and County of San Francisco, a depth of excavation of approximately 10 feet below ground surface is assumed for purposes of this PPA. The project would therefore require a Preliminary Archeological Review (PAR) by the Planning Department Archeologist. The PAR will determine (or confirm) whether or not the project site is located in an area of archeological sensitivity and determine what additional steps may be necessary to identify and evaluate any potential archeological resources that may be affected by the proposed project. Any geotechnical or soils characterization studies or Phase I or II site assessments prepared for the proposed project would also be helpful to the PAR process and should be submitted with the EEA. Please ensure that project drawings and the project description include the estimated depth of excavation, including the depth of the foundation.
3. **Transportation Study.** Planning Department's Transportation staff has reviewed the proposed Transportation Study Scope of Work and do not have any comments or recommendations regarding this work. Planning Department's Transportation staff recommends, however, that the transportation consultant submit the draft Transportation Study for review to Environmental Planning after the project sponsor has filed the EEA.

It is also noted that the City of San Francisco is currently exploring the possibility of running a Bus Rapid Transit alignment along the northern portion of the project site, to facilitate connections between growing neighborhoods in the area with Caltrain and Muni light rail, local bus service and other modes of travel. If SF develops and advances such a proposal within the timeframe of the EIR for the Recology project, we will need to discuss with Brisbane how best to include such information and what level of potential impact analysis is appropriate in the Recology EIR.

4. **Hazardous Materials.** The proposed project would include construction of approximately 213,000 sf of administrative, parking, and industrial uses (resource recovery facilities) on a site that is currently involved in industrial uses (e.g., solid waste collection and processing). Therefore, the project is subject to Article 22A of the Health Code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. ~~The Phase I would determine the potential for site contamination and level of exposure risk~~ associated with the project. Based on that information, soil and/or groundwater sampling and analysis, as well as remediation of any site contamination, may be required. These steps are required to be completed prior to the issuance of any building permit.

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).

5. **Air Quality (AQ) Analysis.** Planning Department's Air Quality technical staff has reviewed the proposed SOW for the Air Quality Technical Study and have the following comments:
- Since the SOW proposes to use San Francisco's thresholds of significance for this project, we recommend that a separate detailed scope of work be prepared for the Air Quality Technical Study for our review, which details the proposed assumptions and methodology to be used.
  - Operational emissions should be quantified for the whole of the project, including the proposed anaerobic digesters.
  - The health risk assessment should be prepared for both construction and operational phases. If San Francisco significance thresholds are used for the health risk assessment, we recommend close coordination with Planning Department's Environmental Planning staff. The model the City relies on for health risk assessments includes all BAAQMD stationary sources within San Francisco. Hence, the HRA consultant would need to (1) update the model to provide a more accurate account of existing emissions from the project site, and (2) perform HRA consistent with the model and layer the project's construction and operational health risks on top of the existing risks. Please also note that this is a cumulative model and, thus, will require considerable analysis and coordination between the AQTS preparers and San Francisco's Planning Department staff to isolate impacts associated with existing facilities.
  - Lastly, we recommend quantifying the project health risks impacts with and without mitigation measures (the SOW does not specify whether these are currently proposed to be quantified).
6. **Greenhouse Gases.** Planning Department's Air Quality technical staff have reviewed the proposed SOW for the Greenhouse Gas Technical study and have the following comments:
- We recommend evaluating all greenhouse gas emissions (not just CO2 emissions).

- b. We recommend adding project-related construction emissions to the operational emissions and annualizing them over the project life.
  - c. GHG emissions associated with energy generation should also be estimated.
  - d. Given the scope, scale, and type of the proposed project, we caution against relying on the San Francisco's GHG Reduction Strategy as an appropriate means of addressing GHG impacts, as the Reduction Strategy is not intended for projects of this type and magnitude. A more appropriate approach would be to prepare an analysis of GHG impacts that relies on quantification of GHGs.
  - e. We encourage the report preparers to work with Planning Department's Environmental Planning staff to scope the modeling assumptions and methodologies for the GHG Technical Study.
7. **Noise.** Planning Department's Noise technical staff have reviewed the proposed SOW for the Noise Technical Study and have the following comment:
- a. We recommend that the Noise Technical Study analysis include a discussion of operational noise associated with the proposed stationary noise sources (i.e., machinery and equipment, etc.), and not just traffic-related noise sources.
  - b. Planning Department's Noise technical staff also recommends that the noise consultant submit the draft Noise Technical Study to Environmental Planning for review after the project sponsor has filed the EEA.
8. **Shadow Study.** The proposed project would result in construction of structures greater than 40 feet in height. Planning Code Section 295 requires that a shadow analysis be performed to determine whether a 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 preliminary shadow fan analysis that indicates the project would not cast new shadow on any properties under the jurisdiction of the Recreation and Park Department, nor would it cast shadows on any other parks or open spaces. However, this shadow fan is preliminary and a final determination regarding the need for additional shadow analysis will be confirmed during the environmental review process.
9. **Wind Study.** The proposed project would involve construction of three structures over 80 feet in height (anaerobic digester tanks, each of which would be approximately 110 feet tall). These structures would be entirely within the Recology facility, which is not open to the general public. Moreover, they would be cylindrical in shape, with curving facades that would likely be too narrow to redirect winds to the ground level to the extent that they would generate wind speeds exceeding the City's pedestrian hazard criterion. Based on the above, it is unlikely that a wind tunnel analysis would be needed. However, this determination will be confirmed during the environmental review process.
10. **Stormwater.** The proposed project would result in a ground surface disturbance of over 5,000 sf in area and is therefore subject to San Francisco's stormwater management requirements as outlined in the Stormwater Management Ordinance and the corresponding SFPUC Stormwater Design Guidelines (Guidelines). Projects that trigger the stormwater management requirements must prepare of a Stormwater Control Plan demonstrating project adherence to the performance measures

outlined in the Guidelines including: (a) reduction in *total volume* and *peak flow rate* of stormwater for areas in combined sewer systems OR (b) *stormwater treatment* for areas in separate sewer systems. Responsibility for review and approval of the Stormwater Control Plan is with the SFPUC, Wastewater Enterprise, Urban Watershed Management Program. Without SFPUC approval of a Stormwater Control Plan, no site or building permits can be issued. The Guidelines also require a signed maintenance agreement to ensure proper care of the necessary stormwater controls. The project's environmental evaluation should generally assess how and where the implementation of necessary stormwater controls would reduce the potential negative impacts of stormwater runoff. To view the Stormwater Management Ordinance, the Stormwater Design Guidelines, or download instructions for the Stormwater Control Plan, go to <http://sfwater.org/sdg>.

11. **Geology.** The project sponsor is required to prepare a geotechnical investigation to identify the primary geotechnical concerns associated with the proposed project and the site. The geotechnical investigation would identify hazards and recommend minimization measures for potential issues regarding, but not limited to, soil preparation and foundation design. The geotechnical investigation should be submitted with the EEA, and will also assist in the archaeological review of the project (see Item 2, Archaeological Resources, above).
12. **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.

#### PLANNING DEPARTMENT APPROVALS:

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

1. A **Building Permit Application** is required for the proposed demolition and new construction on the subject property.
2. A **Variance** may be required to address the Planning Code requirements for off-street parking (Planning Code Section 151). Additional project information is required.

#### 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.

**PRELIMINARY PROJECT COMMENTS:**

The following comments address specific Planning Code and other general issues that may significantly impact the proposed project.

1. **Use.** Per Planning Code Section 210.4, a community recycling collection center is a utility and infrastructure use, which is a principally permitted use in the M-1 and M-2 Zoning Districts.
2. **Floor Area Ratio.** Within the M-1 and M-2 Zoning District, Planning Code Sections 124 and 210.4 outline a floor area ratio of 5.0 to 1. Please confirm that the proposed non-residential square footage is consistent with the floor area ratio limits.
3. **Streetscape Plan and Street Trees.** The Project Sponsor will be required to submit a Streetscape Plan illustrating the location and design of streetscape improvements per Planning Code Section 138.1. The Planning Department has determined that the appropriate streetscape improvements here would be the installation of street trees along the property's frontage as allowed per the Department of Public Works and as required by Planning Code Section 138.1. In general, street trees are required for every 20-feet of frontage of the property along each street or alley, with any remaining fraction of 10-feet or more of frontage requiring an additional tree. Trees within an open area along such right-of-way, but not in a sidewalk, may also meet this requirement.

Please provide a detailed streetscape plan to ensure compliance with this requirement. If any additional improvements are required, the Project Sponsor should contact the Department of Public Works (DPW) as early as possible to understand the process and requirements for permitting street improvements.

4. **Ground Floor Standards in Industrial Districts.** Per Planning Code Section 145.5, new buildings in Industrial Districts shall provide a ground floor, minimum floor-to-floor height of 17-ft, as measured from grade. Please ensure compliance with this requirement.
5. **Off-Street Parking.** Within the M-1 Zoning District, off-street parking is not required; rather, off-street parking is limited to the maximums set within Planning Code Section 151.1. Within the M-2 Zoning District, Planning Code Section 151 requires one off-street parking space for every 1,500 square-feet of occupied floor area for manufacturing and industrial uses.

To accurately determine the amount of off-street parking for this site, please outline the amount of new square footage being constructed within the City and County of San Francisco. Depending on the number of off-street parking spaces, the project may require a variance from Planning Code Section 151.

6. **Off-Street Freight Loading.** For industrial uses in the M-2 Zoning District, Planning Code Section 152 requires off-street freight loading parking spaces. Please confirm the amount of new construction, and ensure compliance with this requirement.



7. **Height.** Planning Code Section 260 outlines the methodology for measuring height. The height limit for this property is 40-feet and applies to the topographical conditions on the site as altered from the proposed grading. Height will therefore be measured from the proposed grade to the finished flat roof or the average height of a pitched or stepped roof. Upon submittal of your application, please provide a site survey, elevations and sections that illustrate the existing topographic conditions. Please also include sections through the center of the building, or building steps, which clearly illustrate the building's height as it follows the altered topography.

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8. **Transit Impact Development Fee (TIDF).** Pursuant to Planning Code Section 411.3, public facility and utility installation uses are exempt from TIDF. Per Planning Code Section 102, a Community Recycling Collection Center is identified as a utility and infrastructure use.
9. **Visitacion Valley/Schlage Lock.** The project site is located adjacent to the proposed Schlage Lock mixed-use development project. The implementation of the Recology project should aim to screen operations and provide as much of a buffer as feasible from the future residential development at the Schlage Lock site. Please refer to the Visitacion Valley-Schlage Lock Special Use District for more information.

**PRELIMINARY PROJECT ASSESSMENT EXPIRATION:**

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation Application and a Building Permit Application, as listed above, must be submitted no later than December 8, 2016. Otherwise, this determination is considered expired and a new Preliminary Project Assessment is required. Such applications and plans must be generally consistent with those found in this Preliminary Project Assessment.

cc: John Glaub, Project Sponsor  
Richard Sucre, Current Planning  
Tania Sheyner, Environmental Planning  
Claudia Flores, Citywide Planning and Analysis  
Jonas Ionin, Planning Commission Secretary  
Charles Rivasplata, SFMTA  
Jerry Sanguinetti, Public Works  
Pauline Perkins, SFPUC  
June Weintraub and Jonathan Piakis, DPH  
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