



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: July 29, 2015
TO: Mike Grisso, KR Flower Mart, LLC
FROM: Joshua Switzky, Planning Department
RE: PPA Case No. 2015-001903PPA / 2015-004256PPA for
630-698 Brannan Street

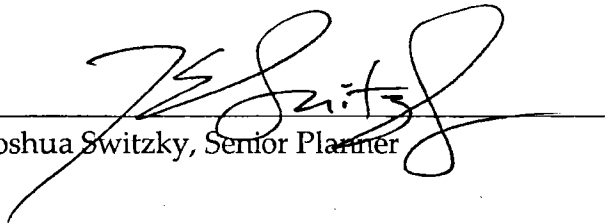
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Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Lisa Chen, at (415) 575-9124 or lisa.chen@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.



Joshua Switzky, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: July 23, 2015 (revised: July 29, 2015)
Case No.: **2015-001903PPA / 2015-004256PPA**
Project Address: 630-698 Brannan Street
Block/Lot: 3778/001B, 002B, 004 and 005
Zoning: SALI (Service/Arts/Light Industrial) Zoning District
40/55-X Height and Bulk District
Western SoMa Special Use District
Existing Area Plan: Western SoMa Community Plan;
Proposed Area Plan: Central SoMa Plan (Draft)
Project Sponsor: Mike Grisso, KR Flower Mart, LLC
415-243-8803
Staff Contact: Lisa Chen, 415-575-9124
lisa.chen@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 project sponsor submitted PPA applications in February 2015 and April 2015, proposing two design variations for the same site. Except where noted, comments in this letter shall apply to both project proposals.

The project would demolish one existing single story warehouse-style building, four single-story with mezzanine buildings, two single-story retail/warehouse buildings, and one single-story industrial building – totaling 157,541 sq. ft. on four adjoining lots – all of which are part of the existing the San Francisco Flower Mart. The first proposal (“February 2015 proposal”) would construct a 1,814,950 sq. ft. mixed-use development, consisting of: (1) three stepped buildings ranging in height from 65 feet to 250 feet with 1,492,450 GSF of office space and 45,800 GSF of ground floor retail (which includes 10,000 sq. ft.

of San Francisco Flower Mart retail space); (2) 115,000 leasable sq. ft. of below-grade warehouse space that would be occupied by the San Francisco Flower Mart; (3) 20,000 sq. ft. of below-grade loading space and 17,500 sq. ft. on-grade truck parking for the San Francisco Flower Mart; (3) 110,000 sq. ft. below-grade parking; and, (4) 14,200 sq. ft. of on-grade office and retail loading. Vehicle access to the underground parking garage and the Flower Mart is proposed on Morris Street (off of Sixth Street), with trucks exiting on the shared private alley and continuing onto Fifth Street. Two levels of below grade parking would accommodate 300 parking spaces, of which 150 spaces would be designated for exclusive Flower Mart use. The project also includes two public plazas totaling 34,175 sq. ft. facing Brannan Street and in the center of the project, which will create mid-block pedestrian connections to Morris Street and to a shared private alley to the north of the property.

The project sponsor also submitted a subsequent application for a Preliminary Project Assessment ("April 2015 proposal") with a project variant that maintains the SF Flower Mart location at street level. This proposal elevates the office towers above a 24' podium that would house the SF Flower Mart and associated retail spaces. The profiles and spacing of the office towers would remain the same; however, the maximum heights would increase, ranging from 77 to 271 feet, and the project square footages would change slightly, featuring: (1) 1,512,260 GSF of office space, (2) 29,550 GSF of ground floor retail, (3) 115,000 GSF of warehouse space for the Flower Mart; and, (4) 147,450 GSF of below-grade parking (accommodating approximately 350 parking spaces, including 25 truck parking spaces for use by Flower Mart tenants). Under this proposal, the northern plaza would be elevated above the 24' podium, with terraces stepping down to the street-level plaza facing Brannan Street. In addition, in lieu of at-grade parking for the Flower Mart, spaces would be designated for truck loading on the shared private alley on the northern edge of the site.

PLANNING CONTEXT:

The proposed project is located within the Western SoMa Community Plan, which was evaluated in the *Western SoMa Community Plan, Rezoning of Adjacent Parcels, and 350 8th Street Project Environmental Impact Report (Western SoMa PEIR)*, certified in 2012.¹ The project site also lies within the proposed Central SoMa Plan area, a community planning process initiated in 2011. The Central Corridor Plan Draft for Public Review² (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 2016.

The existing zoning for the project site is SALI (Service/Arts/Light Industrial), which does not allow office uses, while the proposed use district for the project site in the Draft Plan is Mixed-Use Office (MUO),

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

² 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" refers to the document published in April 2013 under the name "Central Corridor Plan Draft for Public Review."

which would allow office uses as well as the other uses 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 designation for the site is 55/65/85, which would allow buildings up to 85 feet tall on some portions of the project site, while under the modified High-Rise Height Alternative the EIR will study development of buildings up to 270 feet on the project site. At this point, it is unknown which height option, if any, would ultimately be approved by the Planning Commission and Board of Supervisors. Further Central SoMa Plan-related comments in this 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 Environmental Impact Report (EIR), or in a Community Plan Exemption (CPE) if the project is consistent with an adopted community plan (see the discussion under "Community Plan Exemption" below). The proposed project is located within the Western SoMa Area Plan, which was evaluated in the *Western SoMa PEIR*. However, the proposed project is not consistent with the land use or development density (zoning) identified in the Western SoMa Area Plan, and it is therefore not eligible for a CPE under the *Western SoMa PEIR*.

The project's proposed building heights range from 65 to 250 feet for the below-grade Flower Mart configuration (February 2015) and from 77 to 271 feet for the street-level Flower Mart configuration (April 2015). These heights would both be consistent with the High-Rise Height Alternative 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.

Due to the project's location within the geographic area evaluated in the *Western SoMa PEIR*, 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 *Western SoMa PEIR* that may be applicable to the proposed project are discussed below, under the applicable environmental topic. However, mitigation measures from the *Western SoMa PEIR* that are applicable to the proposed project area could be refined, augmented, or superseded under the future Central SoMa Plan EIR, which would become applicable to the proposed project upon approval of the Draft Plan.

Community Plan Exemption

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 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. A CPE may be prepared for such projects. Please note that a CPE is a type of exemption from environmental review, and cannot be modified to reflect changes to a project after approval. Proposed increases beyond the CPE project description in project size or intensity after project approval will require reconsideration of environmental impacts and issuance of a new CEQA determination.

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 (assumed here to be the Central SoMa 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 in 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). (The Planning Department schedule of application fees may be downloaded at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=513>)
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); (b) the standard environmental evaluation fee (which is based on construction value); and (c) one-half of the standard EIR fee (which is also based on construction value). An EIR must be prepared by an environmental consultant from the Planning Department's environmental consultant pool (http://www.sfplanning.org/ftp/files/MEA/Environmental_consultant_pool.pdf). The Planning Department will provide more detail to the project sponsor regarding the EIR process should this level of environmental review be required.

As discussed above, the proposed project is located within the proposed Central SoMa Plan Area, which is under evaluation in the forthcoming Central SoMa Plan EIR; if the proposed project is consistent with the development density identified in the Central SoMa Plan, it may be eligible for a CPE. If the proposed 630-698 Brannan Street project is not consistent with the height and density identified for the project site in the adopted Central SoMa Plan, it would be precluded from qualifying for a CPE under the Central SoMa Plan. The proposed project would be analyzed in a separate environmental document that would not rely on the environmental analysis undertaken for the Central SoMa Plan. In this case, 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 (EEA)**. The EEA can be submitted at the same time as the PPA 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 entitlement application is submitted to the Current Planning Division, only the proposed Project Description will be reviewed by the assigned Environmental Coordinator.** EEAs are available in the Planning Department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at www.sfplanning.org under the "Publications" tab. See "Environmental Applications" on page 2 of the current Fee Schedule for a calculation of environmental application fees.³

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 PPA application. This discussion is applicable to both the February 2015 and April 2015 project proposals, except as noted.

1. **Historic Resources.** The project site contains one or more structures considered to be a potential historic resource (a building constructed 45 or more years ago). The property was surveyed as part of the South of Market Historic Resources Survey and identified for potential architectural and cultural significance, but was not fully evaluated at that time. Therefore, the proposed demolition is subject to review by the Department's Historic Preservation staff. To assist in this review, the project sponsor must hire a qualified professional to prepare a Historic Resource Evaluation (HRE) report. The professional must be selected from the Planning Department's Historic Resource Consultant Pool. Please contact Tina Tam, Senior Preservation Planner, via email at tina.tam@sfgov.org for a list of three consultants from which to choose. Please contact the HRE scoping team at HRE@sfgov.org to arrange the HRE scoping process. The historic resource consultant should submit the draft HRE report for review to Environmental Planning after the project sponsor has filed the EEA and update it as necessary to reflect feedback received in the PPA letter. Historic Preservation staff will not begin reviewing your project until a complete HRE is received.

The Western SoMa PEIR identified two mitigation measures to minimize construction impacts of new development projects on historic resources within 25 feet for non-pile driving activities and 100 feet for pile driving activities: *M-CP-7a: Protect Historical Resources from Adjacent Construction Activities* and *M-CP-7b: Construction Monitoring Program for Historical Resources*. These mitigation measures require an evaluation to determine whether special construction measures are necessary to protect nearby historic resources, as well as implementation of a construction monitoring program for those historic resources. The closest known historic resource is located adjacent to the project site at 701 Bryant Street (3778/001). Therefore, these mitigation measures would apply to the proposed project.

³ San Francisco Planning Department. *Schedule for Application Fees*. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=513>.

2. **Archeological Resources.** Project implementation would include soil-disturbing activities associated with building construction, including excavation to a depth of approximately 25 feet below grade for construction of the underground parking, loading, and Flower Mart operational areas under the February 2015 below-grade Flower Mart scenario, and up to 15 feet for underground parking and loading under the April 2015 street-level Flower Mart scenario. The project site is located within an area where no previous archeological survey has been prepared. The Western SoMa PEIR 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.

Because of the depth of excavation under either the below-grade or street-level Flower Mart configuration, *Western SoMa PEIR Archeological Mitigation Measure M-CP-4a: Project-Specific Preliminary Archeological Assessment* and *M-CP-4b: Procedures for Accidental Discovery of Archeological Resources* would be applicable to the proposed project. *Mitigation Measure M-CP-4a* requires that a Preliminary Archeology Review (PAR) be prepared by the Planning Department archeologist. Based on the PAR, the Environmental Review Officer (ERO) would determine if an Archeological Research Design/Treatment Plan (ARDTP) is required to more definitively identify the potential for CRHR-eligible archeological resources to be present within the project site and to determine the appropriate action necessary to reduce the potential effects of the project on archeological resources to a less-than-significant level. If an ARDTP is required, the scope of the ARDTP will be determined in consultation with the ERO. The Planning Department archeologist will be informed by the geotechnical study of the project site's subsurface geological conditions. (See Geotechnical Study below.) *Mitigation Measure M-CP-4b* outlines procedures for ensuring that appropriate actions are taken in the event that an accidental discovery of archeological resources occurs during the construction of the project.

3. **Transportation.** Based on the Planning Department's Transportation Impact Analysis Guidelines for Environmental Review, the project would require additional transportation analysis to determine whether the project may result in a significant impact.⁴ Therefore, the Planning Department requires that a consultant listed in the Planning Department's Transportation Consultant Pool prepare a Transportation Impact Study. You are required to pay additional fees for the study; please contact Virnaliza 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 so that he can provide you with a list of three consultants from the pre-qualified Transportation Consultant Pool. Upon selection of a transportation consultant, the Department will assign a transportation planner who will direct the scope of the consultant-prepared study.

Additionally, the proposed project is located on a high injury corridor as mapped by Vision Zero.⁵ Planning staff have reviewed the proposed site plans and request the following clarification and offer the following requests, some of which address the safety of persons walking and bicycling to and from the project site and vicinity:

⁴ This document is available at: <http://www.sf-planning.org/index.aspx?page=1886>.

⁵ This document is available at: <http://www.sfmta.com/sites/default/files/projects/2015/vision-zero-san-francisco.pdf>.

- Schedule a site visit by Planning staff will be needed in order to identify pedestrian-related safety issues.
- Clarify what is meant by “semi-queueing” in the PPA application project description.
- Clarify whether new on-street parking spaces on Brannan, 5th, and 6th streets are proposed as Flower Mart loading areas.
- Coordinate any streetscape or roadway improvements with the Central SoMa EIR team as well as Citywide Planning and the San Francisco Municipal Transportation Agency (SFMTA). (See the Preliminary Project Comments and Preliminary Design Comments sections for further discussion.)
- Clarify parking space dimensions and confirm that “SV” notation on plans indicates service vehicle spaces.
- Ensure project design conforms with pedestrian-related policies and design guidelines, especially as the project site is adjacent to high-injury corridors.
- Clearly label alleys on site plans.

Please include the requested information with the EEA and coordinate with the assigned environmental and transportation planners regarding streetscape/roadway and pedestrian improvements.

4. **Noise.** The proposed project would include commercial/light industrial uses that could generate noise levels in excess of ambient noise, either short term, at nighttime, or as a 24-hour average, in the project site vicinity. It would therefore be subject to *Western SoMa PEIR Noise Mitigation Measure M-NO-1c: Siting of Noise-Generating Uses*, which is intended to reduce potential conflicts between existing sensitive receptors and new noise-generating uses. *Mitigation Measure M-NO-1c* requires that a noise analysis be prepared for a new development that could generate noise 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-sensitive uses within 900 feet of, and that have a direct line-of-sight to, the project site. At least one 24-hour noise measurement must be included in the analysis. The analysis must be prepared by person(s) qualified in acoustical analysis and/or engineering and must demonstrate with reasonable certainty that the proposed use would comply with the use compatibility requirements of the San Francisco General Plan and Police Code Section 2909, that the proposed use would not adversely affect nearby noise-sensitive uses, and that there are no particular circumstances about the project site that appear to warrant heightened concern about noise levels that would be generated by the proposed use. 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, and may require implementation of site-specific noise reduction features or strategies.

Construction of the proposed project would generate noise. While construction noise is temporary in nature and regulated by the San Francisco Noise Ordinance, the *Western SoMa PEIR* evaluated construction noise impacts that would result from implementation of the Community Plan and identified two mitigation measures that, when implemented, would reduce these impacts to a less-than-significant level. *Mitigation Measure M-NO-2a: General Construction Noise Control Measures* includes best practices for construction work, such as state-of-the-art noise shielding and muffling

devices and the use of electrically- or hydraulically-powered construction equipment, to minimize construction noise levels. *Mitigation Measure M-NO-2b: Noise Control Measures During Pile Driving* includes a set of site-specific noise attenuation measures for construction projects involving pile driving.

- Air Quality.** The proposed project's 1.8 million sf of office and commercial/light industrial uses exceed the Bay Area Air Quality Management District's (BAAQMD) construction and operational screening levels for criteria air pollutants.⁶ Therefore, an analysis of the project's criteria air pollutant emissions is likely to be required. Please provide detailed information related to construction equipment, phasing and duration of each phase, and volume of excavation as part of the EEA. Should this analysis determine that criteria air pollutant emissions exceed the *Western SoMa PEIR* significance thresholds, construction and operational mitigation measures identified in the PEIR would be required. In addition, *Western SoMa PEIR Mitigation Measure M-AQ-6: Construction Emissions Minimization Plan for Criteria Air Pollutants* requires equipment exhaust minimization measures during construction. Another measure, *Western SoMa PEIR Mitigation Measure M-AQ-2 Transportation Demand Management Strategies for Future Development Projects*, requires various Transportation Demand Management (TDM) strategies be implemented to reduce vehicle trips and associated air pollutant emissions.

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 proposed project will be required to adhere to the dust control requirements set forth in the Construction Dust Ordinance contained in San Francisco Health Code Article 22B and San Francisco Building Code Section 106.A.3.2.6. The proposed project is also required to prepare a Construction Dust Control Plan for review and approval by DPH.

The project site is 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 modeling of air pollution, exposures, and health vulnerability from mobile, stationary, and area source emissions within San Francisco. Should the proposed project include new sensitive land uses (for example, day care facilities), those facilities would be subject to the requirements of Health Code Article 38. Additionally, due to the project site's location within an Air Pollutant Exposure Zone, construction of the project would require compliance with *Western SoMa PEIR Mitigation Measure M-AQ-7: Construction Emissions Minimization Plan for Health Risks and Hazards*.

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 within the Air Pollutant Exposure Zone. If the proposed project includes sensitive receptors (for example, a day care facility), it would be subject to additional requirements under Article 38. Given the proposed project's height of up to 270 feet, the proposed project would likely require a backup diesel generator; additional measures, such as that described in *Western SoMa PEIR Mitigation Measure M-AQ-4: Siting of Uses that*

⁶ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3.

Emit PM_{2.5} or DPM and Other TACs, will likely be necessary to reduce its emissions. Please provide detailed information related to any proposed stationary sources with the EEA.

6. **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.⁷ The project sponsor is required to submit the completed table 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.
7. **Wind.** The proposed project would involve construction of a building over 80 feet in height. The project would therefore be required to comply with *Western SoMa Mitigation Measure M-WS-1: Screening Level Wind Analysis and Wind Tunnel Testing*. Given the proposed project's height, location, and preliminary design, wind tunnel testing will likely be required as part of the analysis. The consultant will be required to prepare a proposed scope of work for review and approval by the Environmental Planning coordinator prior to proceeding with the analysis.
8. **Shadow.** The proposed project would result in construction of a building greater than 40 feet in height. A preliminary shadow fan analysis prepared by Planning Department staff indicates that the proposed project could cast shadows on Victoria Manalo Draves Park and the Gene Friend Recreation Center, both San Francisco Recreation & Parks Department properties, as well as other nearby public and private open spaces. The project sponsor is therefore required to hire a qualified consultant to prepare a detailed shadow study. The consultant must submit a Shadow Study Application, which can be found on the Planning Department's website (<http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=539>). A separate fee is required. The consultant must also prepare a proposed scope of work for review and approval by Environmental Planning staff prior to preparing the analysis.
9. **Utilities and Service Systems.** The proposed project exceeds the threshold for a "water demand project" as defined in Sections 10910 of the California Water Code and preparation of a water supply assessment (WSA) may therefore be required. A determination of the need for a WSA will be made in consultation with the San Francisco Public Utilities Commission during preparation of the environmental documentation for the proposed project.

⁷ Refer to <http://sf-planning.org/index.aspx?page=1886> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

10. **Biological Resources.** The proposed project would include demolition of buildings, and may therefore be required to comply with *Western SoMa Mitigation Measure M-BI-1a: Pre-Construction Special Status Bird Surveys*. This measure requires pre-construction special-status bird surveys during certain time periods when birds are likely to be nesting, and includes restrictions on construction during the breeding period.
11. **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.⁸ A geotechnical study prepared by a qualified consultant must be submitted with the EEA. 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 geological hazards, 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.
12. **Hazardous Materials.** The proposed project would include excavation and below-grade construction on a site with previous and ongoing light industrial uses, and which is included on a map of sites with known or suspected soil and/or groundwater contamination maintained under Article 22A of the Health Code, also known as the Maher Ordinance. Therefore, the project is subject to the Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), and which 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 ESA 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 EEA. Compliance with Health Code Article 22A would meet the requirements of *Western SoMa PEIR Hazardous Materials Mitigation Measure M-HZ-3: Site Assessment and Corrective Action*.

Western SoMa PEIR Hazardous Materials Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement would be applicable to the proposed project. The mitigation measure requires that the project sponsor ensure that any equipment containing polychlorinated biphenyls (PCBs) or mercury,

⁸ San Francisco Planning Department. Interdepartmental Project Review. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=522>.

such as fluorescent light ballasts and fluorescent light tubes, 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, must be abated according to applicable federal, state, and local laws.

Because the existing buildings were constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the buildings. The Bay Area Air Quality Management District (BAAQMD) is responsible for regulating airborne pollutants including asbestos. Please contact BAAQMD for the requirements related to demolition of buildings with asbestos-containing materials. In addition, because of their age (constructed prior to 1978), lead paint may be found in the existing buildings. Please contact the San Francisco Department of Building Inspection (DBI) for requirements related to the demolition of buildings that may contain lead paint.

13. **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 the *Tree Planting and Protection Checklist* with the EEA and ensure that trees are appropriately shown on site plans. Also see the comments below under "Street Trees."
14. **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 CPE; certification of an EIR; adoption of a 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.

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 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. Please see the Preliminary Project Comments section for more details on proposed requirements under the Draft Plan.

1. **Rezoning.** The project site is located within the SALI (Service/Arts/Light Industrial) District. The proposed office use is not permitted under this zoning, but the proposed industrial and retail (subject to applicable size restrictions) uses would be allowed. 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. Office use is permitted in the MUO Zoning District. Please see further discussion in the Preliminary Project Comments section.

2. **Height District Reclassification.** The project site is located within the 40/55-X Height and Bulk District. The height of the proposed project would exceed this 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 55- and 65-feet (proposed Mid-Rise Scenario Alternative) and 55-, 65-, and 85-feet (proposed High-Rise Scenario Alternative) are being considered for this site. The proposed project would not conform with these alternatives put forward in the Draft Plan. However, the EIR currently underway will study a High-Rise Height Alternative of up to 270 feet on the project site. 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. Please see further discussion in the Preliminary Project Comments section.

3. A **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. A **Shadow Application** must be submitted, per Planning Code Section 295. Due to potential shadow impacts on nearby property owned by the San Francisco Recreation and Park Department (see "Preliminary Project Comments" below), the project must be approved by the Recreation and Park Commission.

5. An **Office Allocation** from the Planning Commission is required per Planning Code Section 321 et seq. to establish more than 25,000 gross square feet of new office space.
6. A **Building Permit Application** is required for the demolition of the existing building on the subject property.
7. A **Building Permit Application** is required for the proposed new construction on the subject property.

All 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 analysis examines the proposed project under the proposed zoning outlined within the Draft Central SoMa Area Plan. Unless otherwise noted, the comments apply to both project proposals submitted for this property.

1. **Existing Zoning/Height-Bulk.** The subject property is zoned as a Service/Arts/Light Industrial (SLI) district, which does not permit the proposed office use, but does permit the proposed industrial and retail (subject to applicable size restrictions) uses. It is located within the 40/55-X height and bulk district, which does 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 ongoing Central SoMa Plan study area bounded by 2nd, 6th, Townsend and Market Streets. The Central Corridor Draft Plan was published in April 2013 and is currently being evaluated in an Environmental Impact Report (EIR). The Draft Plan proposes changes to the allowed land uses and building heights, and includes a strategy for improving the public realm in this area. The EIR, the Plan, and the

proposed rezoning and affiliated Code changes are anticipated to be brought before decision-makers for approval in the latter part of 2015 or early 2016.

The Central Corridor 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 Central Corridor Draft Plan.*

- 3. Land Use.** The Central SoMa Draft Plan recommends rezoning the subject property to the Mixed-Use Office (MUO) Zoning District, in which the proposed office, industrial, and retail uses would be allowed. The project also falls within the South SoMa SUD proposed in the Plan, which would require predominantly commercial uses on large sites such as this one, in order to support substantial development in this transit-rich area.

The proposal to maintain the SF Flower Mart on site helps achieve one of the Plan's central goals, which is to support a diversity of jobs and businesses in the area, including Production, Distribution, Repair (PDR) uses. The Flower Mart has been a San Francisco institution for over a century, and still serves an important PDR function. As such, the City has an interest in ensuring its continued operation, whether in its current location or elsewhere in San Francisco, and any development on the project site will be assessed for its potential impact to the ongoing operation and viability of the Flower Mart. The Plan proposes requiring at least 0.5 FAR of PDR space in most commercial developments in order to support these goals across the Plan Area. In addition, in areas currently zoned SALI, 100% replacement of existing PDR space would be required in order to prevent displacement of businesses (the greater of these two requirements would apply). For more information, see the draft policy document on Production, Distribution and Repair at:

Central SoMa Draft Policy Document: Revised Production, Distribution, and Repair (March 2015):
[http://www.sf-planning.org/ftp/files/Citywide/Central Corridor/Draft CentralSoMa PDR Policy-March2015.pdf](http://www.sf-planning.org/ftp/files/Citywide/Central_Corridor/Draft_CentralSoMa_PDR_Policy-March2015.pdf)

Both project proposals, which preserve Flower Mart operations on site, are generally consistent with the intent of the proposed PDR policy. As this proposal is still in a preliminary phase, please ensure that the size of the Flower Mart is consistent with the PDR replacement requirements that are ultimately adopted (currently proposed at 100% replacement of PDR space in SALI districts). The project proposals include 115,000 sq ft of Flower Mart space and 10,000 sq ft of associated retail store frontage (125,000 sq ft total), while the current SF Flower Mart includes 126,500 of leasable warehouse and retail space.

This project also falls within the SoMa Entertainment SUD proposed in the Draft Plan, in which entertainment uses would be permitted. In order to create a diverse and dynamic 24-hour neighborhood characteristic of SoMa, the Central Corridor Plan's preliminary land use principles envision a mixed-use neighborhood in which substantial office development is balanced with retail, arts, entertainment, industrial, and residential uses. The proposed ground floor uses

(45,800 sf of retail uses under the February 2015 proposal; and 115,000 sf of industrial uses and 29,550 sf of retail space under the April 2015 proposal) supports this vision of a mixed-use neighborhood. The project sponsor is encouraged to further explore inclusion of a variety of active uses for these ground floor spaces. Please see the Preliminary Design Comments for further discussion.

4. **Urban Form: Height and Bulk.** In recognition of the desire to accommodate more growth in the area, the draft Central Corridor Plan recommends changing the height limits of the subject property to 55 and 65 feet. Additionally, the Draft Plan includes a Higher Height Alternative, which would allow additional height up to a maximum of 85-feet on a portion of the subject property, while the EIR is evaluating a development scenario of up to 270 feet. The proposed building tower heights, ranging from 65-to-250-feet (February 2015) and 77-to-270 feet (April 2015), are consistent with the High Rise Height Alternative under study in the Central Corridor Plan EIR. The Plan publication and ongoing EIR analysis is not an indication of which heights 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 the proposed heights or whether these bodies will change existing height limits.

Regardless of what height scenario is finally adopted by the Plan, any portions of the building exceeding 85-feet in height would be subject to additional setback requirements and bulk restrictions. Please see the Preliminary Design Comments below for additional discussion of massing and site design. The Central SoMa Draft Policy Paper on Bulk requirements describes the most recent proposal for the Plan's bulk controls, intended to ensure that the neighborhood urban form supports light, air, and sun access to the street, while supporting greater densities. The paper is available at:

Central SoMa Draft Policy Paper: Bulk (February 2015):

http://www.sf-planning.org/ftp/files/Citywide/Central_Corridor/Central_SoMa_Draft_Policy_Paper-Feb2015_graphics.pdf

Please note that existing requirements in Eastern Neighborhoods districts for mid-block alleys and massing reduction for large projects will continue to apply. Please see comment 20 ("Mid-Block Alley") below for more information.

5. **Open Space/Private-ly-Owned Public Open Space (POPOS).** The Central Corridor Draft Plan proposes a requirement that commercial developments include a minimum amount of Privately-Owned Public Open Space (POPOS), similar to those required in the C-3 district under Section 138. If these requirements are adopted as part of the plan, such spaces would need to meet specified provisions on accessibility, design quality, and operations and maintenance. Please see the Central SoMa policy paper on POPOS, found here:

Central SoMa Draft Policy Document: Privately Owned Public Open Spaces (POPOS) (November 2014):

http://www.sf-planning.org/ftp/files/Citywide/Central_Corridor/Draft_CentralSoMa_POPOS_Policy-November2014.pdf

In addition, the Planning Department has developed draft Key Development Sites Guidelines for properties throughout the Plan Area, including the site of the SF Flower Mart. These design guidelines were crafted to help shape development of these key sites, particularly where their size presents special possibilities for realizing public realm or other public benefit objectives, where there is a need for coordination between or within sites, and/or where adjacent investments in transit or open space infrastructure require special consideration of the relationship between private development and the public realm. These guidelines are available at:

Central SoMa Draft Policy Document: Key Development Sites Guidelines (March 2015):
http://www.sf-planning.org/ftp/files/Citywide/Central_Corridor/Draft_CentralSoMa_Policy_Paper-Key_Development_Site_Guidelines-March2015.pdf

The Guidelines for Site 7 ["Flower Mart Block," encompassing both the Flower Mart site as well as the adjacent site at 5th/Brannan (3778/047)] call for continuous mid-block alleys to break down the massing of the block and increase pedestrian connectivity throughout the site. It also calls for coordination on the placement and design of POPOS, consolidating spaces into a single cohesive open space where possible, in order to maximize accessibility and functionality and help meet the great need for additional open spaces in this area. Finally, the guidelines also call for ground-floor activation and specifies that office space shall not be an allowed use along any street or POPOS frontage.

As currently designed, both proposals are inconsistent with these design guidelines, as they do not create adequate mid-block pedestrian connections, nor do they meet the intent of the recommended placement of POPOS within the block. This is particularly true of the April 2015 proposal, which does not include continuous pedestrian access at the rear of the elevated plaza. Further, the POPOS are designed as a segmented series of plazas that do not connect with the adjacent site, and that are lined with office uses. Please see the Preliminary Design Comments section below for additional comments.

6. **Streetscape Improvements.** The Draft Plan calls for streetscape improvements across the study area, with extensive streetscape improvements proposed along Brannan Street in order to support a safe, convenient, and attractive street environment for all users. Proposed improvements on this section of Brannan Street include wider sidewalks, reducing the number of traffic lanes, one-way cycle tracks on both sides of the street, and adding a signalized mid-block crossing. The Plan would also prohibit new curb cuts on this street. The proposed project will be expected to implement street improvements consistent with the Plan along any adjacent street and alley frontages. Please see comment 11 ("Street Trees / Streetscape Plan") and the Preliminary Design Comments for further discussion.

7. **Sustainability & Central SoMa Eco-District.** The Department sees a special opportunity for the Flower Market site to exhibit a variety of sustainability best practices including and beyond those required by the Green Building Code and other City and State sustainability requirements. The proposed project could serve as one of the primary anchor properties for the Central SoMa Eco-District. An “eco-district” is a neighborhood or district where residents, community institutions, property owners, developers, and businesses join together with city staff and utility providers to meet sustainability goals by formulating a portfolio of innovative projects at a district or block-level. The Planning Department has identified the Central SoMa plan area as a Type 2 Eco-District—an infill area composed of many smaller parcels and property owners.

All major new development in the Central SoMa Plan Area will be expected to participate in some capacity in the Eco-District Program and a possible Sustainability Management Association to help guide it. In addition, Planning staff have been in conversation with Kilroy Realty staff regarding voluntary sustainability measures related to energy, water use and building systems. Department staff will continue to work with Kilroy on further refinement and feasibility of site-specific sustainability strategies. For more information please see:

San Francisco Eco-District Program:

<http://www.sf-planning.org/index.aspx?page=3051>

Central SoMa Eco-District Task Force Recommendations Report (2013):

http://www.sf-planning.org/ftp/files/plans-and-programs/emerging_issues/sustainable-development/CentralSoMa_EcoDTaskForceReport_112513.pdf

The following comments address specific Planning Code and other general issues that may substantially impact the proposed project. Please note that these comments reflect current Planning Code requirements for this property, which may differ from the requirements being considered under the Central SoMa Plan. Please see the comments above and the Preliminary Design Comments for more information.

8. **Interdepartmental Project Review.** This review is required for all proposed new construction in seismic hazard zones, in which the subject property falls. Please go to the Department’s website for information about the application.
9. **Large Project Authorization:** Planning Code Section 329 outlines the requirements for a Large Project Authorization in Eastern Neighborhoods Mixed Use Zoning Districts. Under these requirements, a Large Project Authorization is required of new construction of more than 25,000 gross square feet. All large projects within the MUO Zoning District are subject to review by the Planning Commission in an effort to achieve the objectives and policies of the General Plan, the applicable Design Guidelines and the Planning Code. Additional modifications of certain Planning Code requirements may be granted under the Large Project Authorization.
10. **Office Allocation.** As defined in Planning Code Section 321, the proposed project would need to obtain an Office Development Authorization from the Planning Commission for new

construction of over 25,000 GSF of office use. Please note that proposed amount of office use exceeds the annual limit allocation of 875,000 GSF per year for large cap projects (more than 50,000 GSF), such that entitlement of the proposed project in its entirety would depend on the accrual of unused allocations over more than one annual cycle. The Planning Department recommends that the project sponsor monitor the status of the Annual Limit Program at: <http://www.sf-planning.org/index.aspx?page=3254>

11. **Street Trees/Streetscape Plan.** 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, as well as the submittal of a streetscape plan for projects above a certain size. The proposed project would require additional street trees along public rights-of-way, as well as submittal of a streetscape plan identifying proposed improvements. Please consult with the Department of Public Works regarding the placement of the street trees. Per Planning Code Section 138.1, the Department will require standard streetscape elements and sidewalk widening for the appropriate street type per the Better Streets Plan, including landscaping, site furnishings, and/or corner curb extensions (bulb-outs) at intersections. Please see the Preliminary Design Comments for further discussion.
12. **Street Frontage.** Planning Code Section 145.1 outlines requirements for street frontages to ensure that they are pedestrian-oriented, fine-grained, and are appropriate and compatible with the buildings in MUO District. Please ensure that the ground floor street frontage meets all of these requirements as related to use, ground floor ceiling height, transparency, fenestration, gates, railings and grillwork.
13. **Shadow.** Planning Code Section 147 states that a shadow analysis is required any project over 50 feet in height in the Eastern Neighborhoods Plan Area. Similarly, Planning Code Section 295 requires a shadow analysis be conducted for any project greater than 40 feet in height. The preliminary analysis for the proposed project indicates that it may cast shadows on nearby public parks; therefore, additional analysis will be required. See comment 8 ("Shadow") in the Environmental Review section for more information.
14. **Parking.** Under current zoning (SALI) and the zoning proposed under the Draft Central Corridor Plan (MUO), no parking would be required. However, each of these zoning districts would have parking maximums, which are listed in Planning Code Section 151.1. For office use within the MUO Zoning District, parking is limited to seven percent of the gross floor area of office use. For retail use within the MUO Zoning District, parking is permitted at a ratio of 1 car for each 1,500 sq ft of retail use. For other manufacturing and industrial uses, parking is permitted at a ratio of 1 car for each 1,500 square feet of occupied floor area.
15. **Bicycle Parking & Showers.** Planning Code Section 155.2 outlines the requirement for bicycle parking in new development. The number of required Class 1 and Class 2 bicycle parking spaces shall be dependent on the amount of retail, PDR, and office space.

In addition, Planning Code Section 155.4 outlines the requirement for shower facilities and lockers for office and retail development. For office development over 50,000 sq ft, a minimum four showers and twenty-four clothes lockers are required. Please ensure compliance with these requirements.

16. **Car-Sharing.** Planning Code Section 166 provides the required number of car sharing spaces for new construction. The number of required car-share parking spaces shall be dependent on the amount of off-street parking. Please ensure compliance with this requirement.
17. **Transportation Management Program.** Pursuant to Planning Code Section 163, an agreement will be required to be executed with the Planning Department to ensure that transportation brokerage services are provided for the life of the project.
18. **Horizontal Mass Reduction:** Planning Code Section 270.1 requires a horizontal mass reduction for all new construction projects with street frontage greater than 200-ft in length. Currently, the proposed project has approximately 241-ft of frontage along Folsom Street. Therefore, the proposed project is required to incorporate a mass reduction that: 1) is not less than 30-ft in width; 2) is not less than 60-ft in depth from the street-facing building façade; 3) extends up to the sky from a level not higher than 25-ft above grade or the third-story, whichever is lower; and 4) results in discrete building sections with a maximum plan length along the street frontage not greater than 200-ft. Please ensure that the project meets this requirement. Please see comment 4 (“Urban Form: Height and Bulk”) and the Preliminary Design Comments for more information on massing requirements proposed in the Draft Plan.
19. **Narrow Street Height Provisions:** For projects within the MUO Zoning District along a Narrow Street (a public right of way less than or equal to 40 feet in width, or any mid-block passage or alley that is less than 40 feet in width), Planning Code Section 261.1 specifies that all subject frontages shall have upper stories set back at least 10 feet at the property line above a height equivalent to 1.25 times the width of the abutting narrow street. No part or feature of a building may penetrate the required setback plane. Please see comment 4 (“Urban Form: Height and Bulk”) and the Preliminary Design Comments for more information on massing requirements proposed in the Draft Plan.
20. **Mid-Block Alley:** Planning Code Section 270.2 outlines requirements for new construction on parcels that have one or more street frontages of over 200 linear feet on a block face longer than 400 feet between intersections. For new construction on lots with greater than 300 linear feet of street frontage, a publicly accessible mid-block alley for the entire depth of the property will be required. This alley should generally be located toward the middle of the subject block face and be perpendicular to the subject frontage. Additional provisions for this requirement are specified within the aforementioned code section. Please see comment 5 (“Open Space / Privately-Owned Public Open Space (POPOS)”) and the Preliminary Design Comments for more information on proposed requirements under the Draft Plan.

21. **Transit Impact Development Fee.** Pursuant to Planning Code Section 411 et seq., the Transit Impact Development Fee (TIDF) will apply to this project. Please be aware that under the ongoing Transportation Sustainability Program, a proposed new transportation impact fee (the Transportation Sustainability Fee, or TSF) may replace the TIDF. Additional information on this program is available on the Department's website at:
<http://www.sf-planning.org/index.aspx?page=3035>
22. **Eastern Neighborhoods Impact Fees.** This project is subject to the applicable fees outlined in Section 423 et seq.
23. **Jobs-Housing Linkage Program.** Pursuant to Planning Code Section 413 et seq., the Jobs-Housing Linkage Program fee will apply to this project.
24. **Child Care Requirements.** Pursuant to Planning Code Section 414 et seq., this project will be subject to child care requirements, and/or the associated in-lieu fee, since it is constructing more than 50,000 gsf of office space.
25. **Public Art.** Pursuant to Planning Code Section 429 et seq., this project will be subject to the public art requirements, since it involves new construction of non-residential use in excess of 25,000 sq ft within the MUO Zoning District.
26. **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

PRELIMINARY DESIGN COMMENTS:

The project is located in the study area of the Central SoMa Area Plan, currently in process. The site is large and unique, currently housing the San Francisco Flower Mart in a neighborhood with a mixed character of commercial, PDR and residential uses. While the existing neighborhood context includes one to eight story buildings, the Draft Plan proposes a significant increase in density in the area, as it is well served by local and regional transit. The plan proposes several high-rise and large floorplate mid-rise projects on adjacent blocks. The following comments address preliminary design issues that may significantly impact the proposed project:

1. **Site Design, Open Space, and Massing.** The Planning Department recommends that the open space and massing strategy be reframed to better support the goals of the Central SoMa district identity, specifically that the area is intended to be a mid-rise district punctuated with occasional

towers. To clearly define this mid-rise massing, the plan proposes establishing a defined and variable streetwall between 65-ft and 85-ft to keep a strong yet pedestrian-scaled edge along the major streets. A handful of towers (defined as any mass above 160') will be permitted in the Plan Area and are to be small (maximum floorplate of 15,000 sf for office) from the 85' plane and above to be more "spire-like." The Planning Department finds that the current proposal, as a campus of buildings, shifts the balance and definition of the massing and open space too much in favor of the latter, such that the buildings are seen more as objects in an open environment rather than a mid-rise solid with relief open spaces carved from it.

Additionally, the Plan's proposed rezoning generally reinforces a neighborhood pattern of larger heights on the large streets with lower heights towards the center of the block. While there are few existing small streets or alleys present in the large block bounded by Sixth, Fifth, Bryant and Brannan, the Plan seeks to further the scale and massing of this characteristic pattern, including a re-establishment of smaller streets or alleys to provide permeability and physical access through the interior of the site. The current proposal deviates from this intent by including a high-rise tower at the center of the development site and by its lack of connectivity and permeability to the adjacent site at 5th & Brannan, and to 5th Street generally. The proposed massing of the buildings effectively creates a solid barrier to visual and physical connectivity to 5th Street in a way that is not consistent with the draft Plan. The project sponsor will need to consider how the scenario with the Flower Mart above grade can be designed to achieve these objectives and not create extensive stretches of ground-level impermeability, particularly when the Mart is not in operation.

Note also that the draft Plan currently includes an apparent mass reduction bulk control (informally known as "skyplane") which would apply at lot edges. The Planning Department recommends reviewing the "Shaping New Buildings" boards created for the last community meeting to review this intent in more depth, available at (see pages 6 -11):

http://www.sf-planning.org/ftp/files/Citywide/Central_Corridor/CentralSoma_Combined_Storyboards-032515.pdf

We recommend that the project sponsors and their design team further work with the staff developing the Key Development Sites Guidelines as part of the Central SoMa plan, which can be found here:

Central SoMa Draft Policy Document: Key Development Sites Guidelines (March 2015):

http://www.sf-planning.org/ftp/files/Citywide/Central_Corridor/Draft_CentralSoMa_Policy_Paper-Key_Development_Site_Guidelines-March2015.pdf

2. **Street Frontage.** The unique nature of the Flower Mart use presents opportunities to support open space identity, accessibility, and connectivity in Central SoMa. Along with fulfilling Planning Code Sections 138 (Privately-Owned Public Open Space) and 270.2 (Mid-Block Alley

requirements), the project should provide a defined singular space or intentional network of spaces that are programmed and designed to be inclusive and attractive to the public and local residents in addition to workers and tenants on site and in the vicinity. Most importantly, the interior of the block should be positively activated and permeable even when the Flower Mart is not open. The current proposal in the Draft Plan would require active uses, such as retail, lining all POPOS frontages. Both proposals would not be compliant with this key requirement, as they feature office uses along the portions of the plaza.

The Flower Mart could itself be redefined as a semi-open environment with a strong sense of permeability to the public realm. This inventive ground floor “landscape” would be able to facilitate access for service vehicles and the industrial nature of the commercial activity, while being safe and spatially connected for pedestrians and their retail interface. As the project has significant POPOS requirements and the Flower Mart may consume and require a large portion of the lot area, we recommend continuing to work with Planning Department staff to consider how best to meet the requirement and intents of both the open space and mid-block alley requirements through creative building massing, ground floor programming, and landscape design. Please see the Central SoMa POPOS policy paper found here:

Central SoMa Draft Policy Document: Privately Owned Public Open Spaces (POPOS) (November 2014):
[http://www.sf-planning.org/ftp/files/Citywide/Central Corridor/Draft CentralSoMa POPOS Policy-November2014.pdf](http://www.sf-planning.org/ftp/files/Citywide/Central_Corridor/Draft_CentralSoMa_POPOS_Policy-November2014.pdf)

Due to the complexity of the site context and great potential to influence the character of the area, the Planning Department encourages the project sponsor to initiate this landscape and ground floor design development early in the project.

Additionally, per Planning Code Section 138.1, the Department will require standard streetscape elements and sidewalk widening for the appropriate street type per the Better Streets Plan, including landscaping, site furnishings, and/or corner curb extensions (bulb-outs) at intersections (See Better Streets Plan Section 4 for Standard Improvements and Section 5.3 for Bulb-Out Guidelines). The project sponsor is required to submit a Streetscape Plan illustrating these features, and the department will work with the project sponsor and other relevant departments to determine an appropriate streetscape design. Standard street improvement would be part of basic project approvals not count for as credit towards in-kind contributions.

- 3. Architecture.** As the project proposal is diagrammatic, the Planning Department has little comment on the architecture at this time but recommends that the project express significant depth and high-quality materials in the facades and reflect the architectural detailing and character of the neighborhood.

Above all, the project should express a clear and neighborhood-compatible architectural idea that not only provides a contemporary set of buildings, but acknowledges the history of the site, expresses the unique nature of the development program, and feels accessible and welcoming for

its public elements. The architecture should consider itself as a campus of features that may have some commonality, but may also express variety in their concept, material creativity, and personality.

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 **January, 23, 2017**. 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

cc: Richard Sucre, Current Planning
Elizabeth Purl, Environmental Planning
Maia Small, Design Review
Jonas Ionin, Planning Commission Secretary
Charles Rivasplata, MTA
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