



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: September 17, 2015
TO: Steve Shanks, SKS Partners
FROM: Mark Luellen, Planning Department
RE: PPA Case No. 2015-008058PPA for 547-555-557 Howard Street

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Tina Chang, at (415) 575-9197 or tina.chang@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

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

Mark Luellen, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: September 17, 2015
Case No.: **2015-008058PPA**
Project Address: 547-555-557 Howard Street
Block/Lot: 3736/086,107,110
Zoning: C-3-O (SD)
Transbay C3 SUD
Transit Center C-3-O (SD) SUD
350-S
Area Plan: Transbay
Transit Center District
Downtown
Project Sponsor: Steve Shanks, SKS Partners
415.421.8200
Staff Contact: Tina Chang – 310.307.6122
tina.chang@sfgov.org

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CA 94103-2479

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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 June 19, 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 proposal is to a) demolish two existing two-story buildings amounting to approximately 30,180 square feet, containing office and retail uses; b) retain one, 12,075 square-foot, two-story mixed-use structure with ground floor retail and office above; and c) construct a 360,721 square foot 38-story, 405' tall, mixed-use tower with hotel occupying the first 15 floors, residential uses occupying the remaining habitable floors, and the last two floors reserved for mechanical appurtenances and equipment. The project proposes to add 223 hotel rooms, 127 residential units, 106 bicycle parking spaces, 76 off-street parking spaces in two, below-grade parking levels, requiring approximately 15' of excavation and accessed by what appear to be two curb cuts along the Tehama Street frontage.

BACKGROUND:

The project site is within the Transit Center District. The Transit Center District Plan is a subarea of the Downtown Plan, and consists of approximately 145 acres centered on the Transbay Transit Center, situated between the Northern Financial District, Rincon Hill, Yerba Buena Center and the Bay. The boundaries of the District are roughly Market Street on the north, Embarcadero on the east, Folsom Street on the south, and Hawthorne Street to the west. On May 24, 2012, the Planning Commission certified the *Transit Center District Plan and Transit Tower EIR* by Motion 18628 and adopted the Preferred Project for final recommendation to the Board of Supervisors.^{1,2} The Transit Center District and its associated rezoning became effective September 7, 2012.

ENVIRONMENTAL REVIEW:

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.

As discussed above, the project site is located within the Transit Center District, which was evaluated in the *Transit Center District Plan and Transit Tower PEIR*. If the proposed project is consistent with the development density identified in the area plan, it would be eligible for a community plan exemption (CPE). 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 San Francisco Planning Department. Transit Center District Plan and Transit Tower Final Environmental Impact Report (FEIR), Planning Department Case No. 2007.0558E, 2008.0789 certified May 24, 2012. Available at the Planning Department under case number 2008.0789 (electronic files).

² San Francisco Planning Department. San Francisco Planning Commission Motion 18628, May 24, 2012. Available online at: <http://commissions.sfplanning.org/cpcmotions/2012/18628.pdf>, accessed August 31, 2015.

1. **CPE Only.** All potentially significant project-specific and cumulatively considerable environmental impacts are fully consistent with significant impacts identified in the *Transit Center District Plan and Transit Tower PEIR*, 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 *Transit Center District Plan and Transit Tower PEIR* are applied to the proposed project, and a CPE checklist and certificate is prepared. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,659) and (b) the CPE certificate fee (currently \$7,580).
2. **Mitigated Negative Declaration.** If new site- or project-specific significant impacts are identified for the proposed project that were not identified in the *Transit Center District Plan and Transit Tower PEIR*, 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 *Transit Center District Plan and Transit Tower PEIR*, with all pertinent mitigation measures and CEQA findings from the *Transit Center District Plan and Transit Tower PEIR* 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 *Transit Center District Plan and Transit Tower PEIR*, with all pertinent mitigation measures and CEQA findings from the *Transit Center District Plan and Transit Tower PEIR* 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.

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 addressed through the environmental review process. Some of these would require additional study based on the preliminary review of the project as it is proposed in the PPA application.

1. **Historic Resources.** The existing buildings on the project site are less than 45 years of age and/or were previously evaluated in a historical resources survey and found ineligible for national, state, or local listing. Thus, the proposed project is not subject to review by the Department’s Historic Preservation staff; no additional analysis of historic architectural resources is required.
2. **Archeological Resources.** As the project site lies within the Transit Center District Plan Area, the proposed project is subject to the *Transit Center District Plan and Transit Tower PEIR* mitigation measure *M-CP-1: Subsequent Archeological Testing Program*. The proposed project will require Preliminary Archeological Review (PAR) by a Planning Department archeologist. To aid this review the Department archeologist may request a Preliminary Archeological Sensitivity Assessment (PASS) by a Department Qualified Archeological Consultant, subject to the review and approval by the Department archeologist. The Department archeologist will provide three names from the Qualified Archeological Consultant list if the PASS is required. The PAR will assess the archeological sensitivity of the project site based on in-house source material and will consider the potential for archeological impacts resulting from proposed soils disturbance. Please provide detailed information, including sections, proposed soils-disturbing activities, such as grading, excavation, installation of foundations, soils improvement, and site remediation in the EEA, and submit the required geotechnical study as well as any available phase II hazardous materials reports prepared for the project to assist in this review. If the Department archeologist determines that the project has a potential to adversely affect archeological resources, the PAR will identify additional measures needed to address the potential effect. These measures may include preparation of an archeological research design and treatment plan, implementation of project mitigation measures (such as archeological testing, monitoring, or accidental discovery), or other appropriate measures.
3. **Tribal Cultural Resources.** Tribal cultural resources (TCRs) are a class of resource established under the California Environmental Quality Act (CEQA) in 2015. TCRs are defined as a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American tribe, that is either included on or eligible for inclusion in the California Register of Historical Resources or a local historic register, or is a resource that the lead agency, at its discretion and supported by substantial evidence, determines is a TCR. Planning Department staff will review the proposed project to determine if it may cause an adverse effect to a TCR; this will occur in tandem with preliminary archeological review. No additional information is needed from the project sponsor at this time. Consultation with California Native American tribes regarding TCRs may be required at the request of the tribes. If staff determines that the proposed project may have a potential significant

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

adverse impact on a TCR, mitigation measures will be identified and required. Mitigation measures may include avoidance, protection, or preservation of the TCR and development of interpretation and public education and artistic programs.

4. **Transportation.** Based on the Planning Department's *Transportation Impact Analysis Guidelines for Environmental Review*,⁴ the project would likely require additional transportation analysis to determine whether the project may result in a significant impact. 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 Vimaliza 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.

Planning staff have reviewed the proposed site plans and have the following requests and recommendations, some of which address the safety of persons walking and cycling to and from project site and vicinity:

- Detail compliance with the San Francisco Better Streets Plan on plans and specify sidewalks dimensions on plans;
 - Describe the frequency and size (number of attendees) for likely large-scale events associated with the hotel use;
 - Ensure consistency in circulation and site design/access with the *Transit Center District Plan*, especially along Tehama Street;
 - Consider reducing the proposed curb cut on Tehama from 18 feet to 12 feet;
 - Submit car stacking specifications.
5. **Noise.** As the proposed project includes residential uses and is located along a street with a noise level above 70 dBA Ldn (i.e. Howard Street). *Transit Center District Plan and Transit Tower EIR Noise Mitigation Measure M-NO-1a: Noise Survey and Measurements for Residential Uses* and *Mitigation Measure M-NO-1b: Noise Minimization for Residential Open Space* would apply to the proposed project to address residents' exposure to ambient noise.

Transit Center District Plan and Transit Tower EIR Noise Mitigation Measure M-NO-1d: Mechanical Equipment Noise Standard and *Noise Mitigation Measure M-NO-1e: Interior Mechanical Equipment* would also apply to the proposed project. These mitigation measures require the identification of both rooftop and interior mechanical equipment and evaluation of potential noise impacts on residential

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

uses. The measures aim to achieve the maximum feasible reduction of building equipment noise in the final project design.

Transit Center District Plan and Transit Tower PEIR Noise Mitigation Measure M-NO-2a: Noise Control Measures During Pile Driving applies to any project within the Transit Center District Plan Area that requires pile driving. This mitigation measure requires the adoption of feasible site-specific noise attenuation measures, including the use of “quiet” pile-driving technology, and the monitoring of their effectiveness. Project sponsors shall also require contractors to schedule pile-driving activity for times of the day that would minimize disturbance to neighboring uses.

Transit Center District Plan and Transit Tower PEIR Noise Mitigation Measure M-NO-2b: General Construction Noise Measures would also apply to the project. This measure calls on the project sponsor to minimize construction noise to the maximum extent feasible, and requires, among other measures, the best available noise control techniques for equipment and vehicles, the location of stationary noise sources (such as compressors) as far from sensitive receptors as possible, the construction of barriers around some noise sources, and the use of hydraulically or electrically powered impact tools. The project sponsor must develop a list of measures to respond to and track noise complaints for the Department of Building Inspection (DBI) to approve, and, prior to the issuance of a building permit, notify neighbors of the complaint process and provide an on-site informational posting. The project sponsor shall also be required to participate in any City-sponsored area program to reduce the effects of construction noise, per *Transit Center District Plan and Transit Tower PEIR Noise Mitigation Measure M-C-NO: Cumulative Construction Noise Control Measures*.

6. **Air Quality.** The proposed project’s 127 dwelling units and 223 hotel rooms do not exceed the Bay Area Air Quality Management District’s (BAAQMD) construction or operational screening levels for criteria air pollutants.⁵ Therefore, an analysis of the project’s criteria air pollutant emissions is not likely to be required.

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 also located within an Air Pollutant Exposure Zone, as mapped and defined by Health Code, Article 38. The Air Pollutant Exposure Zone identifies areas with poor air quality based on modeling of air pollution, exposures, and health vulnerability from mobile, stationary, and area source emissions within San Francisco. The project proposes to construct new sensitive land uses (i.e., residential), which are subject to enhanced ventilation measures pursuant to Health Code Article 38. The project sponsor will be required to submit an Article 38 application to DPH prior to the issuance of any environmental determination. Please provide a copy of the Article 38 application with the

⁵ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3.

EEA.⁶ In addition, equipment exhaust measures during construction, such as those listed in *Transit Center District Plan and Transit Tower PEIR Mitigation Measure M-AQ-4a: Construction Vehicle Emissions Minimization* and *Mitigation Measure M-AQ-5: Construction Vehicle Emissions Evaluation and Minimization* will likely be required.

If the project would generate new sources of toxic air contaminants including, but not limited to: diesel generators or boilers, or any other stationary sources, the project would result in toxic air contaminants that may affect both on-site and off-site sensitive receptors. Given the proposed project's height of 380 feet, the proposed project would likely require a backup diesel generator. Please provide detailed information, including specifications, of the generator and any other proposed stationary sources, with the EEA.

7. **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.
8. **Wind.** As discussed below under "Preliminary Project Comments," the project site is in the C-3-O Zoning District, and is subject to Planning Code limits on ground-level wind speeds. A wind tunnel analysis will be required in order to determine project compliance with these Planning Code provisions. Additionally, ground-level wind speeds will be assessed as part of the project's environmental review. The project will therefore require a consultant-prepared wind tunnel analysis. The consultant will be required to prepare a proposed scope of work for review and approval by the assigned Current Planning and Environmental Planning staff prior to proceeding with the analysis.
9. **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 a variety of open spaces, both public and private, including the City Park currently under construction atop the Transbay Terminal, the future Transbay Park, as well as number of existing Privately Owned Public Open Spaces (POPOS). 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

⁶ Refer to <http://www.sfdph.org/dph/eh/Air/default.asp> for more information.

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

required. The consultant must also prepare a proposed scope of work for review and approval by Environmental Planning staff prior to preparing the analysis.

10. **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 boring logs for the proposed project in addition to the required geotechnical study. This study will also help inform the Planning Department Archeologist of the project site's subsurface geological conditions.
11. **Hazardous Materials.** The proposed project would construct new residential units and excavate to a depth of 20 feet below grade on parcels 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 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.

Transit Center District Plan and Transit Tower PEIR Mitigation Measure M-HZ-3 L-1: 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 di(2-ethylhexyl) phthalate (DEPH), such as fluorescent light ballasts, and any fluorescent light tubes containing mercury be removed and properly disposed of in accordance with applicable federal, state, and local laws. In addition, any other hazardous materials identified, either before or during work, must be abated according to applicable federal, state, and local laws.

Because the existing buildings proposed for demolition were constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the building. The Bay Area Air Quality Management District (BAAQMD) is responsible for regulating airborne pollutants

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

including asbestos. Please contact BAAQMD for the requirements related to demolition of buildings with asbestos-containing materials. In addition, because of its age (constructed prior to 1978), lead paint may be found in the existing building. Please contact the San Francisco Department of Building Inspection (DBI) for requirements related to the demolition of buildings that may contain lead paint.

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 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."
13. **Disclosure Report for Developers of Major City Projects.** The San Francisco Ethics Commission S.F. Camp. & Govt. Conduct Code § 3.520 et seq. requires developers to provide the public with information about donations that developers make to nonprofit organizations that may communicate with the City and County regarding major development projects. This report must be completed and filed by the developer of any "major project." A major project is a real estate development project located in the City and County of San Francisco with estimated construction costs exceeding \$1,000,000 where either: (1) The Planning Commission or any other local lead agency certifies an EIR for the project; or (2) The project relies on a program EIR and the Planning Department, Planning Commission, or any other local lead agency adopts any final environmental determination under CEQA. A final environmental determination includes: the issuance of a Community Plan Exemption (CPE); certification of a CPE/EIR; adoption of a CPE/Final Mitigated Negative Declaration; or a project approval by the Planning Commission that adopts CEQA Findings. (In instances where more than one of the preceding determinations occur, the filing requirement shall be triggered by the earliest such determination.) A major project does not include a residential development project with four or fewer dwelling units. The first (or initial) report must be filed within 30 days of the date the Planning Commission (or any other local lead agency) certifies the EIR for that project or, for a major project relying on a program EIR, within 30 days of the date that the Planning Department, Planning Commission, or any other local lead agency adopts a final environmental determination under CEQA. Please submit a Disclosure Report for Developers of Major City Projects to the San Francisco Ethics Commission. This form can be found at the Planning Department or online at <http://www.sfethics.org>.

PLANNING DEPARTMENT APPROVALS:

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

1. **Permit Review in C-3 Districts** from the Planning Commission is required per Planning Code Section 309 for the new construction of development greater than 75 feet in height and greater than 50,000 gross square feet, and for seeking exceptions from specific provisions of the Planning Code, including but not limited to rear yard, setbacks, bulk, ground level wind currents. Be advised that

additional design requirements and limitations may be imposed on the proposed project in order to achieve the objectives and policies of the General Plan or the purposes of this Code.

2. **Conditional Use Authorization** is required for projects proposing Hotels in C-3 Districts.
3. **Variance** is required for exposure. As proposed, it appears that approximately 78 units do not meet exposure requirements as set forth in Section 140 of the Planning Code.
4. A **Building Permit Application** is required for the demolition of each existing building on the subject property.
5. A **Building Permit Application** is required for the proposed new construction on the subject property.

Large Project Authorization, Conditional Use Authorization and Variance 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 Inspection at 1660 Mission Street.

NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

Project Sponsors are encouraged, and in some cases required, 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.

Notification of a Project Receiving Environmental Review. Notice may be required to be sent to occupants of the project site and properties adjacent to the project site, as well as to owners and, to the extent feasible, occupants of properties within 300 feet of the project site at the initiation of the environmental review process. Please be prepared to provide mailing addresses on a CD upon request during the environmental review process.

PRELIMINARY PROJECT COMMENTS:

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

1. **Interdepartmental Project Review.** This review is required for all proposed new construction that are eight stories or more and new construction on parcels identified by the State of California Department of Conservation, Division of Mines and Geology as Seismic Hazard Zones in the City

and County of San Francisco. Project sponsors may elect to request an interdepartmental review for any project at any time; however, it is strongly recommended that the request is made prior to Planning Department approval of the first construction building permit. The Department acts as the lead agency in collaboration with the Department of Building Inspection (DBI); the Department of Public Works (DPW); and the San Francisco Fire Department (SFFD). Department staff from each of these agencies would attend the Interdepartmental Project Review Meeting. An application is enclosed.

2. **Setbacks and Streetwall Articulation.** Section 132.1(c) of the Planning Code focuses on establishing a streetwall base. To establish an appropriate street wall in relation to the width of the street and to adjacent structures and to avoid the perception of overwhelming mass that would be created by a number of tall buildings built close together with unrelieved vertical rise, new buildings taller than 150 feet, on development lots in the C-3-O(SD) district facing a street wider than 35 feet shall establish a distinctive streetwall, even where no distinct cornice line or streetwall exists, at a height between 50 and 100 feet for not less than 40% of the linear frontage of all street frontages of such development lot. Such streetwall shall be established by an upper story setback or by a combination of upper story setback and horizontal projection (either occupied or decorative, as allowed in Section 136), creating horizontal relief totaling at least 10 feet, however, the upper story setback shall not be less than 5 feet. Exceptions to this subsection (c)(1) may be allowed in accordance with the procedures of Section 309, if the following criteria have been met:
 - o Design of the proposed project successfully creates a clearly defined building base that establishes or maintains an appropriate streetwall at the height or height range described above,
 - o The base is not defined solely by recessing the base,
 - o The overall building mass tapers or steps away from the street above the streetwall reducing any sense of unrelieved vertical rise directly from the sidewalk edge, and
 - o The overall architectural expression of the proposed project is exceptional, unique, and consistent with the intent of the streetwall requirement.

The project is subject to Setback and Streetwall Articulation requirements of this code. As proposed, no such setbacks or streetwall articulation are provided, therefore an exception per Section 309 must be sought.

3. **Separation of Towers.** Section 132.1(d) requires that all structures in the S and S-2 Bulk Districts shall be set back from an interior property line which does not abut a public sidewalk and from the property line abutting the right-of-way of a public street or alley. The setback shall be a minimum of 15 horizontal feet measured from the interior property line or the center of a public right-of-way, as the case may be, beginning at a height which is 1.25 times the width of the principal street on which the building face, and increasing to the widths indicated in Chart A as the building increases in height. While a tower separation setback is provided along the eastern property line, one is not proposed for along the western property line. As proposed, the project requires a 309 exception.
4. **Rear Yard.** Section 134 requires the project to provide a rear yard of at least 25 percent of the lot depth. Because this project fronts Howard Street, the rear yard would be placed towards Tehama Street. In C-3 Districts, an exception to the rear yard requirements may be allowed in accordance with

the provisions of Section 309, provided that the building location and configuration assure adequate light and air to windows within residential units and to the useable open space provided. While the project provides a side setback along the east side of the building and a roof terrace at Level 21 of the proposed Project, a Code compliant rear yard is not provided, therefore requiring an exception per Section 309.

5. **Open Space – Residential.** Section 135 requires 36 square feet of open space each dwelling unit if private open space is provided or 48 square feet of open space per dwelling unit if common open space is provided. Additionally, any such open spaces must meet the dimensional requirements of Subsections (f) and (g). The plans submitted show private open spaces for some units, though it is unclear if the minimum six foot dimension requirements are met. It is also unclear if the proposed common space on the 21st level second floor sufficiently meets the common open space requirements as dimensions for such spaces were not provided. If open space requirements are not met, a Variance from Section 135 would be required.
6. **Street trees.** Planning Code Section 138.1 requires one street tree for every 20 feet of frontage for new construction. With approximately 150 feet of street frontage along Howard and Tehama Streets, eight street trees would be required. No street trees are shown on the plans. Please complete the required Tree Planting and Protection Checklist and return to the Planner. Please show the six required new street trees on the proposed site plan. No permit will be approved by the Planning Department before satisfying all applicable tree-related requirements. Before any application is made to the Planning Department, you may choose to go directly to the Department of Public Works (DPW) to determine whether or not the required trees mentioned above can feasibly be planted. In order to do this, you should bring to DPW: (1) a completed Tree Planting and Protection Checklist [this need NOT be signed by Planning Dept. staff]; (2) project plans [11"×17" is acceptable]; and (3) a DPW tree planting application. Submittals can be made to DPW's offices at 1155 Market Street or electronically at www.sfdpw.org -> "Services A-Z" -> "Trees". After DPW does their analysis and fieldwork, DPW will provide you with a signed referral form with their determination which should then be provided to the Planning Department.

Please note that the trees must be a 24-inch box size and meet the following additional requirements: (1) have a minimum 2 inch caliper, measured at breast height; (2) branch a minimum of 80 inches above sidewalk grade; (3) be planted in a sidewalk opening at least 16 square feet, and have a minimum soil depth of 3 feet 6 inches; (4) include street tree basins edged with decorative treatment, such as pavers or cobbles; (5) be planted in a continuous soil-filled trench parallel to the curb, such that the basin for each tree is connected.

7. **Privately-Owned Public Open Space (Sec. 138).** An applicant for a permit to construct a new building in C-3 Districts shall provide open space at a ratio of one square feet of open space for every 50 gross square feet of all non-residential uses. The open space required by Section 138 may be on the same site as the building for which the permit is sought, or within 900 feet of it on either private property or, with the approval of all relevant public agencies, public property, provided that all open space must be located entirely within the C-3 District.

8. **Bird Safety (Sec. 139).** It is unclear if the Project will create a feature-related hazard by providing more than 24 square feet of unbroken glass. If a feature-related hazard is created, the glass must be treated with bird-safe glazing and the type of glass proposed must be indicated on plans.
9. **Dwelling Unit Exposure (Sec. 140).** Each dwelling units must have at least one room that meets the 120 square foot minimum floor area requirement of Section 503 of the Housing Code directly face an open area of a public street or alley at least 20' in width, a side yard at least 25' in width, or rear yard meeting the requirements of this Code; provided that if such windows are on an outer court whose width is less than 25 feet, the depth of such court shall be no greater than its width; or an open area which is unobstructed and is no less than 25 feet in every horizontal dimension for the floor at which the dwelling unit in question is located and the floor immediately above it, with an increase of five feet in every horizontal dimension at each subsequent floor. The side setbacks and roof terraces proposed at residential levels do not meet minimum exposure requirements, therefore the a Variance from Section 140 is required. The Department generally encourages projects to minimize the number of units needing an exposure exception.
10. **Rooftop Screening (Section 141).** Be advised that rooftop mechanical equipment must be arranged so as not to be visible from any point at or below the roof level of the subject building.
11. **Parking Screening and Greening (Section 142).** Be advised that the parking and vehicle use areas less than 25 linear feet adjacent to a public right-of-way is required pursuant to Planning Code section 142.
12. **Street Frontages (Section 145(c)(2)).** No more than one-third of the width or 20 feet, whichever is less, of any given street frontage of a new or altered structure parallel to and facing a street shall be devoted to parking and loading ingress or egress. As proposed, the Project requires a Variance from Planning Code Section 145(c)(2).
13. **Shadow Analysis (Section 147).** Section 147 requires that new buildings and additions to existing buildings in C-3, South of Market Mixed Use, and Eastern Neighborhoods Mixed Use Districts that exceed 50 feet shall be shaped to reduce substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Section [295](#). A preliminary shadow study was conducted by Staff in conjunction with this PPA Application, and it indicated that the project will not cast a shadow on any park or open space protected under Planning Code Section 295. Department staff has prepared a shadow fan that indicates the project may cast new shadow on a variety of open spaces, both public and private, including the City Park currently under construction atop the Transbay Terminal, the future Transbay Park, as well as number of existing Privately Owned Public Open Spaces (POPOS). Therefore, a detailed shadow analysis would need to be prepared to determine if the project would create new shadow that results in an adverse impact to the aforementioned open spaces pursuant to Section 147. If this detailed shadow analysis finds that the project would cast shadow on the City Park, the future Transbay Park and existing Privately Owned Public Open Spaces, the sponsor should explore sculpting of portions of the project to avoid casting new shadows on the open space.

14. **Ground Floor Wind Currents (Section 148).** In C-3 Districts, buildings and additions to existing buildings shall be shaped, or other wind-baffling measures shall be adopted, so that the developments will not cause ground-level wind currents to exceed, more than 10 percent of the time year round, between 7:00 a.m. and 6:00 p.m., the comfort level of 11 m.p.h. equivalent wind speed in areas of substantial pedestrian use and seven m.p.h. equivalent wind speed in public seating areas.

When preexisting ambient wind speeds exceed the comfort level, or when a proposed building or addition may cause ambient wind speeds to exceed the comfort level, the building shall be designed to reduce the ambient wind speeds to meet the requirements. An exception may be granted, in accordance with the provisions of Section 309, allowing the building or addition to add to the amount of time that the comfort level is exceeded by the least practical amount if (1) it can be shown that a building or addition cannot be shaped and other wind-baffling measures cannot be adopted to meet the foregoing requirements without creating an unattractive and ungainly building form and without unduly restricting the development potential of the building site in question, and (2) it is concluded that, because of the limited amount by which the comfort level is exceeded, the limited location in which the comfort level is exceeded, or the limited time during which the comfort level is exceeded, the addition is insubstantial.

No exception shall be granted and no building or addition shall be permitted that causes equivalent wind speeds to reach or exceed the hazard level of 26 miles per hour for a single hour of the year.

15. **Off-Street Parking (Section 151).** The Project appears to comply with principally permitted parking. Planning Code Section 151 permits one parking space for every two dwelling units in C-3 Zoning Districts and 1 parking space for every 16 hotel rooms for a total of approximately 77 parking spaces. Be advised that one parking space accessible to persons with disabilities must be provided for every 25 parking spaces. Be advised that all proposed off-street parking spaces must comply with dimensions outlined in Planning Code Section 154.
16. **Off-Street Freight Loading (Section 152).** Two off-street freight loading spaces are required for projects proposing 200,001 – 500,000 gross square feet of floor area. As the project proposes a development of approximately 373,000 gross square feet, two off-street freight loading spaces are required. Be advised that all proposed off-street parking spaces must comply with dimensions outlined in Planning Code Section 154.
17. **Bicycle Parking (Section 155.1).** One Class 1 parking space is required for the first 100 dwelling units and one Class 1 parking space for every four dwelling units over 100, and one Class 2 bicycle parking space for every 20 dwelling units. Additionally one Class 1 and Class 2 parking space is required for every 30 hotel rooms. One Class 2 parking space is also required for every 5,000 square feet of conference and or meeting rooms. As the Project proposes 127 dwelling units and 223 hotel rooms, a total of 113 Class 1 and 14 Class 2 bicycle parking spaces are required for the project as proposed.
18. **Tour Bus Loading Spaces (Section 162).** One off-street tour bus loading space is required for hotels with 201-350 rooms. As the Project proposes 223 hotel rooms, one off-street bus loading space is required.

19. **Transportation Management Programs (Section 163).** For projects where the gross square feet of new construction or added floor area for any residential and non-residential use equals at least 100,000 square feet or 100 dwelling units, the project sponsor shall be required to provide on-site transportation brokerage services for the actual lifetime of the project, as provided in this Subsection. Prior to the issuance of a temporary permit of occupancy (for this purpose Section 149(d) shall apply), the project sponsor shall execute an agreement with the Planning Department for the provision of on-site transportation brokerage services and preparation of a transportation management program to be approved by the Director of Planning and implemented by the provider of transportation brokerage services. The transportation management program and transportation brokerage services shall be designed:
- (1) To promote and coordinate effective and efficient use of transit by tenants and their employees, including the provision of transit information and sale of transit passes on-site;
 - (2) To promote and coordinate ridesharing activities for all tenants and their employees within the structure or use;
 - (3) To reduce parking demand and assure the proper and most efficient use of on-site or off-site parking, where applicable, such that all provided parking conforms with the requirements of Article 1.5 of this Code and project approval requirements;
 - (4) To promote and encourage the provision and proliferation of car-sharing services convenient to tenants and employees of the subject buildings in addition to those required by Section 166, and to promote and encourage those tenants and their employees to prioritize the use of car-share services for activities that necessitate automobile travel, including the promotion and sale of individual and business memberships in certified car-sharing organizations, as defined by Section 166(b)(2).
 - (5) To promote and encourage project occupants to adopt a coordinated flex-time or staggered work hours program designed to more evenly distribute the arrival and departure times of employees within normal peak commute periods;
 - (6) To participate with other project sponsors in a network of transportation brokerage services for the respective downtown, South of Market area, or other area of employment concentration in Mixed Use Districts;
 - (7) To carry out other activities determined by the Planning Department to be appropriate to meeting the purpose of this requirement.
20. **Car Share (Section 166).** One car share parking space is required for any residential project within 50-200 residential units. As the project proposes 127 dwelling units, one car share parking space is required.
21. **Unbundled Parking (Section 167).** Be advised that all off-street parking spaces accessory to residential uses in new structures of 10 dwelling units or more, shall be leased or sold separately from the rental or purchase fees for dwelling units for the life of the dwelling units, such that potential renters or buyers have the option of renting or buying a residential unit at a price lower than would be the case if there were a single price for both the residential unit and the parking space.
22. **Diaper-Changing Accommodations (Section 168).** Be advised that 1 diaper-changing accommodation at each floor containing restrooms open to the general public is required. As

proposed, such accommodations would be required on the lobby level, the restaurant level, and possibly level three, where the spa is proposed, if this facility will be open to the general public.

23. **Transbay C-3 Special Use District (Section 249.28).** Be advised that projects fall within the Transbay C-3 SUD are required to provide a minimum of 15% of all units constructed on the site shall be affordable to and occupied by qualifying persons and families and defined by the Transbay Redevelopment Plan. Further, all inclusionary units shall be built on-site; and off-site construction or in-lieu fee payment are not permitted to satisfy this requirement. Additionally, the project falls within the Zone 2 of Transit Center Redevelopment Area and must meet the housing requirements of the Redevelopment Plan.
24. **Special Height Exceptions (Section 263.9).** In S Districts, additional height up to 10 percent of the heights shown on Maps 1H, 2H and 7H of the Zoning Map may be allowed as an extension of the upper tower, provided that the volume of the upper tower as extended is reduced by the percentage shown in Chart C of Section 271.

This additional height may be allowed pursuant to the provisions of Section 309 only to the extent it is determined that the upper tower volume is distributed in a way that will add significantly to the sense of slenderness of the building and to the visual interest to the termination of the building, and that the added height will improve the appearance of the sky-line when viewed from a distance, will not adversely affect light and air to adjacent properties, and will not add significant shadows to public open spaces

As the project falls within a 350' height and bulk district, the upper tower of the proposed structure may reach a height of an addition 35' provided that the aforementioned conditions are met. As proposed, it does not appear that the project is code compliant with respect to height, even in considering the potential upper tower extension. Please provide a Code-compliant building with respect to height, as no additional exception or variance may be granted for projects exceeding height controls permitted by the Planning Code.

25. **Bulk (Section 270).** In S Districts, bulk limits are prescribed in Section 270(d). As proposed, it appears that bulk exceptions, pursuant to Planning Code Section 272 and 309 may be required for floors 8-14 and 15-20, which are limited to a maximum length of 160 and 130 feet, and maximum diagonal of 190 and 160 feet, respectively, with an average floor size of 17,000 square feet, and a maximum floor size of 20,000 square feet for the lower tower, and maximum average floor size of 12,000 square feet and maximum floor size of 17,000 square feet for the upper tower portion of the building. As proposed, the project appears to comply with respect to floor plate size, but may be slightly too large with respect to maximum length, requiring a Section 309 Exception for bulk. However, a Code compliant building is encouraged.
26. **Entertainment Commission Outreach (Section 314).** The Project appears to be located within 300' of Places of Entertainment, and are therefore subject to an Entertainment Commission outreach process. The Planning Department cannot complete the processing of a project until the following has occurred:

- a. The Entertainment Commission has provided written notification to the Planning Department either indicating that the Entertainment Commission did not wish to hold a hearing, or that it held a hearing and the Project sponsor attended the hearing; and
- b. The Entertainment Commission has provided written comments and recommendations, if any; and
- c. A Project Sponsor with a residential project subject to the new Entertainment Commission outreach process has shown compliance with that process by including a copy of any comments and/or recommendations provided by the Entertainment Commission regarding the proposed Project as well as the date(s) when the those comments were provided. This shall be done as an additional sheet in any plan set submitted to the Planning Department and as an attachment in an entitlement application.

The Planning Department and Commission will consider the compatibility of uses when approving Residential Uses adjacent to or near existing permitted Places of Entertainment and shall take all reasonably available means through the City's design review and approval processes to ensure that the design of such new residential development project takes into account the needs and interests of both the Places of Entertainment and the future residents of the new development. Considerations may include:

- a. The proposed project's consistency with applicable design guidelines;
- b. Any proceedings held by the Entertainment Commission relating to the proposed Project; and
- c. Any comments and recommendations provided to the Planning Department by the Entertainment Commission regarding noise issues related to the project.

When a project that is subject to the Entertainment Commission outreach process is approved, an NSR must be recorded with the Assessor-Recorder that states all of the restrictions of Administrative Code Section 116.8 and any other conditions that the Planning Commission or Department places on the property.

A link to the ordinance can be found here:

<https://sfgov.legistar.com/View.ashx?M=F&ID=3760025&GUID=5BCAC01C-7344-4F51-B406-E7D8B987FAE8>.

For more information, please review the "Guidelines for Entertainment Commission Review of Residential Development Proposals" found here:

<http://www.sfgov2.org/modules/showdocument.aspx?documentid=2712>

27. **Shadow Analysis (Section 295).** Section 295 requires that a shadow analysis must be performed to determine whether the project has the potential to cast shadow on properties under the jurisdiction of the San Francisco Recreation and Park Commission. Department staff has prepared a shadow fan that indicates the project may cast new shadow on the City Park currently under construction atop the Transbay Terminal and the future Transbay Park. Therefore, a detailed shadow analysis would need to be prepared to determine if the project would create new shadow in that results in an adverse impact to City Park and Transbay Park. Although these parks do not currently fall under the

jurisdiction of the San Francisco Parks and Recreation Department, the parks will eventually be transferred to a City agency when the Transbay Redevelopment Plan expires. If this detailed shadow analysis finds that the project would cast shadow on City Park and Transbay Park, the sponsor should explore sculpting of portions of the project to avoid casting new shadows on the parks.

28. **First Source Hiring Agreement.** A First Source Hiring Agreement is required for any project proposing to construct 25,000 gross square feet or more. For more information, please contact:

Ken Nim, Workforce Compliance Officer
CityBuild, Office of Economic and Workforce Development
City and County of San Francisco
50 Van Ness Avenue, San Francisco, CA 94102
(415) 581-2303

29. **Stormwater.** If the project results in a ground surface disturbance of 5,000 sf or greater, it is subject to San Francisco's stormwater management requirements as outlined in the Stormwater Management Ordinance and the corresponding SFPUC Stormwater Design Guidelines (Guidelines). Projects that trigger the stormwater management requirements must prepare a Stormwater Control Plan demonstrating project adherence to the performance measures outlined in the Guidelines including: (a) reduction in *total volume* and *peak flow rate* of stormwater for areas in combined sewer systems OR (b) *stormwater treatment* for areas in separate sewer systems. The SFPUC Wastewater Enterprise, Urban Watershed Management Program is responsible for review and approval of the Stormwater Control Plan. 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. To view the Stormwater Management Ordinance, the Stormwater Design Guidelines, or download instructions for the Stormwater Control Plan, go to <http://sfwater.org/sdg>. Applicants may contact stormwaterreview@sfwater.org for assistance.
30. **Recycled Water.** Projects located in San Francisco's designated recycled water use areas are required to install recycled water systems for irrigation, cooling, and/or toilet and urinal flushing in accordance with the Recycled (or Reclaimed) Water Use Ordinance, adopted as Article 22 of the San Francisco Public Works Code. New construction or major alterations with a total cumulative area of 40,000 square feet or more; any new, modified, or existing irrigated areas of 10,000 square feet or more; and all subdivisions are required to comply. To determine if the proposed project is in a designated recycled water use area, and for more information about the recycled water requirements, please visit sfwater.org/index.aspx?page=687.
31. **Non-potable Water Reuse.** Beginning November 1, 2015, all new buildings of 250,000 square feet or more of gross floor area, located within the boundaries of San Francisco's designated recycled water use area, must install non-potable water reuse systems to treat and reuse available alternate water sources for toilet and urinal flushing and irrigation. This requirement expands to the entire city the following year, on November 1, 2016. Your project will need approvals from the San Francisco Public Utilities Commission and permits from both the Department of Public Health and DBI to verify compliance with the requirements and local health and safety codes. To view more information about

the requirements, please visit <http://www.sfwater.org/np>. Project teams may contact nonpotable@sfwater.org for assistance.

32. **Impact Fees.** This project will be subject to various impact fees. Please refer to the [Planning Director's Bulletin No. 1](#) for an overview of Development Impact Fees, and to the Department of Building Inspection's [Development Impact Fee webpage](#) for more information about current rates.

Based on an initial review of the proposed project, the following impact fees, which are assessed by the Planning Department, will be required:

- a. Transit Impact Development Fee (TIDF)
- b. Jobs-Housing Linkage (413)
- c. Child-Care (414)
- d. Downtown Park Fee (412)
- e. Transit Center District Open Space Impact Fee (424.6)
- f. Transit Center District Transportation and Street Improvement Impact Fee (424.7)
- g. Transit Center District Mello Roos Community Facilities Impact Fee (424.8)
- h. Public Art (429)

PRELIMINARY DESIGN COMMENTS:

The following comments address preliminary design issues that may substantially affect the proposed project:

1. **Site Design, Open Space, and Massing.** The Planning Department recommends that the building comply with the setbacks, bulk, massing, and height requirements of the Code. The Planning Department recommends the project establish a street wall with the base, define a lower tower setback from that base, and an upper tower. The Code specifies 15' setbacks from side property lines above the base.
2. **Street Frontage.** Though not historically significant for full preservation, the existing buildings represent human-scaled and textured artifacts worthy of incorporating into the new building. The Planning Department recommends exploring retention and integration of the existing buildings or facades. Because the existing buildings are not historical preservation worthy, they offer greater architectural freedom to work with.

The ground floor Tehama frontage is devoted entirely to service functions. The Planning Department recommends minimizing the garage entrance to a single lane in width and consolidating the loading and vehicular functions behind a single garage entrance, and allocating more frontage to active uses.

3. **Architecture.** The intent of the bulk and height controls specifically address design of slender and tapering silhouettes with distinctive roof terminations. Exceptions from the Code must be justified with exceptional design.

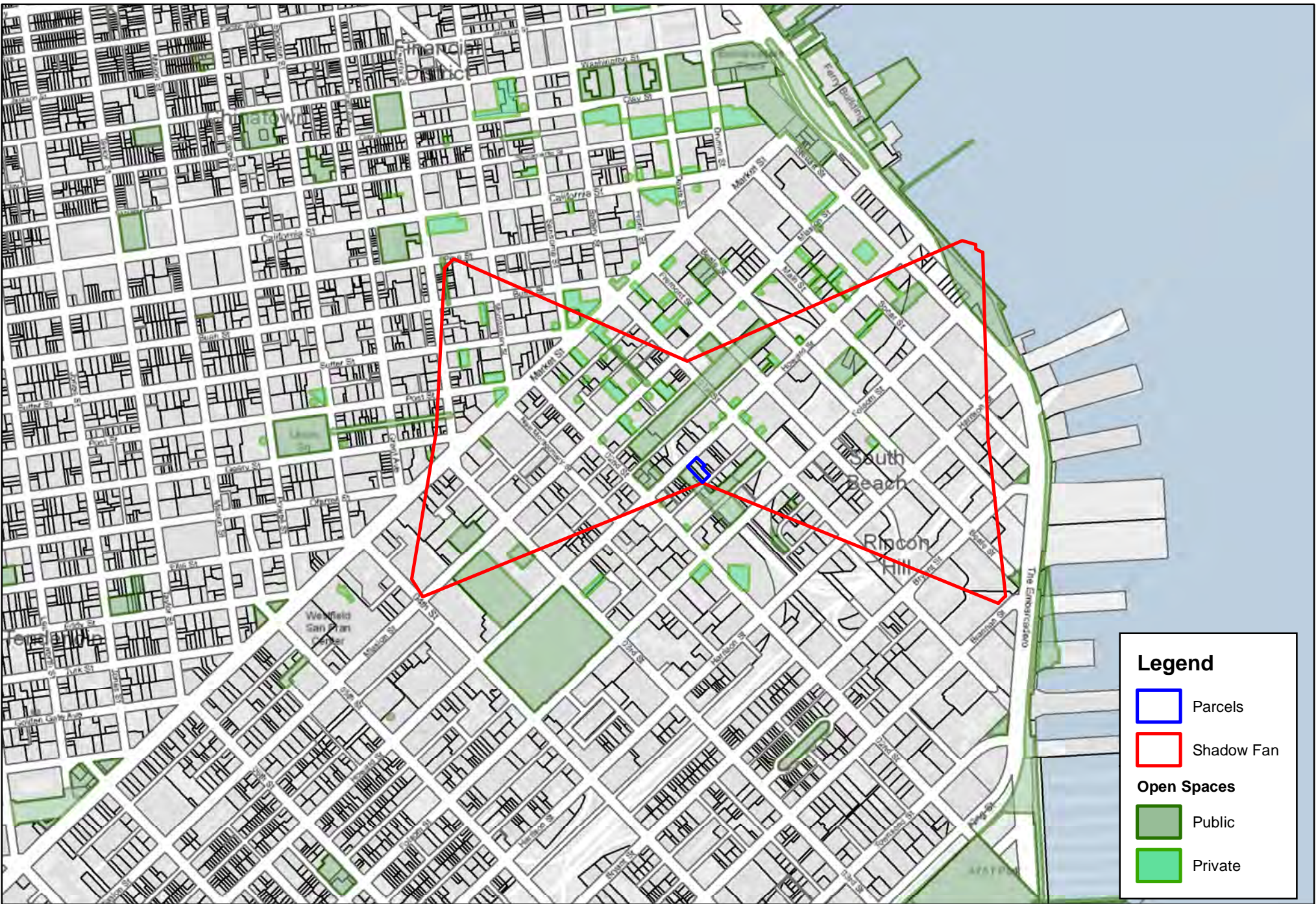
PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Conditional Use Authorization, Variance, Section 309 Review or Building Permit Application, as listed above, must be submitted no later than **March 17, 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
Interdepartmental Project Review Application
SFPUC Recycled Water Information Sheet

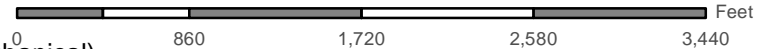
cc: Descalso-Howard Street Family PTNSH, Property Owner
Steve Shanks, Project Sponsor
Tina Chang, Current Planning
Mark Luellen, Current Planning
Justin Horner, Environmental Planning
Kimia Haddadan, Citywide Planning and Analysis
Jonas Ionin, Planning Commission Secretary
Charles Rivasplata, SFMTA
Jerry Sanguinetti, Public Works
Pauline Perkins, SFPUC
June Weintraub and Jonathan Piakis, DPH
Planning Department Webmaster (planning.webmaster@sfgov.org)



Title: 555 Howard St- Preliminary Shadow Fan Analysis

Comments: Proposed Building Height: 405' feet (350' + 35' Upper Tower extension + 20' penthouse / mechanical)

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