



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: November 12, 2015
TO: Suzanne Brown, Equity Community Builders
FROM: Lisa Gibson, Planning Department
RE: PPA Case No. 2015-009928PPA for 75 Arkansas Street Project

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, Susan Mickelsen, at (415) 575-9039 or susan.mickelsen@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

A handwritten signature in cursive script that reads "Lisa Gibson".

Lisa Gibson, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: November 10, 2015
Case No.: **2015-009928PPA**
Project Address: 75 Arkansas Street
Block/Lot: 3952/001B
Zoning: Urban Mixed Use (UMU) District
48-X Height and Bulk District
Area Plan: Eastern Neighborhoods Area Plan: Showplace Square/Potrero Hill
Project Sponsor: Suzanne Brown, Equity Community Builders
415-577-3723
Staff Contact: Susan Mickelsen – 415-575-9039
susan.mickelsen@sfgov.org

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DISCLAIMERS:

This Preliminary Project Assessment (PPA) letter provides feedback to the project sponsor from the Planning Department regarding the proposed project described in the PPA application submitted on July 31, 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 21,997-square-foot (sf) project site is located on the northwest corner of intersection of Arkansas and 17th Streets in the Potrero Hill neighborhood. The project sponsor proposes to demolish the existing 19,250-sf industrial building and construct a 4-story, 48-foot-tall mixed-use student housing building. The existing building on the subject lot was constructed in 1923 and is designated a Category C (no historic resource present) building. The proposed 65,061-sf, 4-story building would include 49,809 sf, or 50 units

of student housing, 7,814 sf of retail/"multipurpose" space and 4,739 sf of "support/utility" space. The 50 units of student housing would include an estimated 126 bedrooms or 252 beds. No off-street parking would be provided. One commercial loading space accessed via a curb cut on Arkansas Street is proposed. The project includes 120 Class I bicycle parking spaces and 4 Class II spaces located on the ground floor. For building construction, a concrete mat slab on pile foundation is anticipated. Excavation would occur up to 2'6" deep and would include 2,240 cubic yards (cy) of soil disturbance.

BACKGROUND:

The project site is within the Eastern Neighborhoods Area Plans. The Eastern Neighborhoods Area Plans cover the Mission, East South of Market (SoMa), Showplace Square/Potrero Hill (location of project site), and Central Waterfront neighborhoods. On August 7, 2008, the Planning Commission certified the *Eastern Neighborhoods Programmatic Final Environmental Impact Report (Eastern Neighborhoods PEIR)* by Motion 17659 and adopted the Preferred Project for final recommendation to the Board of Supervisors.^{1,2} The Eastern Neighborhoods Area Plans and its associated rezoning became effective December 19, 2008.

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 Eastern Neighborhoods Area Plan, which was evaluated in the *Eastern Neighborhoods 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. **CPE Only.** All potentially significant project-specific and cumulatively considerable environmental impacts are fully consistent with significant impacts identified in the *Eastern Neighborhoods 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 *Eastern Neighborhoods PEIR* are applied to the proposed project, and a CPE checklist and certificate is prepared. With this

¹ San Francisco Planning Department. Eastern Neighborhoods Rezoning and Area Plans Final Environmental Impact Report (FEIR), Planning Department Case No. 2004.0160E, certified August 7, 2008. Available online at: <http://www.sf-planning.org/index.aspx?page=1893>, accessed August 17, 2012.

² San Francisco Planning Department. San Francisco Planning Commission Motion 17659, August 7, 2008. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=1268>, accessed August 17, 2012.

outcome, the applicable fees are: (a) the CPE determination fee (currently \$14,017) and (b) the CPE certificate fee (currently \$7,779).

2. **Mitigated Negative Declaration.** If new site- or project-specific significant impacts are identified for the proposed project that were not identified in the *Eastern Neighborhoods 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 *Eastern Neighborhoods PEIR*, with all pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods PEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$14,017) 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 *Eastern Neighborhoods PEIR*, with all pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods PEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$14,017); (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.

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 building on the project site is less than 45 years of age and/or was 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.

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.** The project site lies within the Archeological Mitigation Zone J-2: Properties with No Previous Studies of the *Eastern Neighborhoods PEIR*. Therefore, 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 any available geotechnical/soils or 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 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 PPA submittal, a transportation impact study will not likely be required. However, an official determination will be made subsequent to submittal of the EEA. In order to facilitate that determination, Planning staff propose the following recommendations:
 - Label dimensions on existing curb cut;
 - Label sidewalk widths;
 - Meet minimum loading dock width; and
 - Describe how the project conforms to the Better Streets Plan recommendations.

Please provide the above requested information as a supplement to the EEA submitted with the PPA application.

5. **Noise.** The *Eastern Neighborhoods PEIR* identified mitigation measures to reduce potential conflicts between existing and new noise-generating uses and new sensitive receptors, such as residential uses. *Eastern Neighborhoods PEIR Noise Mitigation Measure F-1: Construction Noise* addresses requirements related to the use of pile-driving. As a supplement to the EEA submittal, please indicate whether the proposed construction and/or foundation would require pile driving. If pile driving is required, *Noise Mitigation Measure F-1* would apply to the proposed project. This mitigation measure prohibits the use of impact pile drivers wherever feasible and requires that contractors use pile driving equipment with state-of-the-art noise shielding and muffling devices. To reduce noise and vibration impacts, sonic or vibratory sheet pile drivers, rather than impact drivers, shall be used wherever sheetpiles are needed. Project sponsors shall also require that contractors schedule pile-driving activity for times of the day that would minimize disturbance to neighbors.

Eastern Neighborhoods PEIR Noise Mitigation Measure F-2: Construction Noise requires that the project sponsor develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant when the environmental review of a development project determines that construction noise controls are necessary due to the nature of planned construction practices and sensitivity of proximate uses. This mitigation measure requires that a plan for such measures be submitted to DBI prior to commencing construction to ensure that maximum feasible noise attenuation will be achieved.

Based on the *Eastern Neighborhoods PEIR*, the project site is located in an area where traffic-related noise exceeds 60 dBA Ldn (a day-night averaged sound level). *Eastern Neighborhoods PEIR Noise Mitigation Measure F-3: Interior Noise Levels* requires that the project sponsor conduct a detailed analysis of noise reduction measures for new development including noise-sensitive uses, including residential uses, located along streets with noise levels above 60 dBA (Ldn), where such development is not already subject to the California Noise Insulation Standards in Title 24 of the California Code of Regulations.⁴ Noise insulation features recommended by the analysis to reduce interior noise levels must be included in the project's design.

The *Eastern Neighborhood PEIR Noise Mitigation Measure F-4: Siting of Noise-Sensitive Uses* would apply to the proposed project because it includes siting a new noise-sensitive (residential) use. This mitigation measure requires an acoustical consultant prepare a noise analysis accounting for existing noise-generating uses within 900 feet of, and that have a direct line-of-sight to, the project site. The analysis would need to demonstrate that acceptable interior noise levels for the project residential units are consistent with Title 24 standards.

Eastern Neighborhoods PEIR Noise Mitigation Measure F-5: Siting of Noise-Generating Uses would not be anticipated to apply to the proposed project because the project would not include commercial, industrial, or other uses that would be expected to generate noise levels in excess of ambient noise, either short term, at nighttime, or as a 24-hour average, in the project site vicinity. As a supplement to the EEA submittal, please indicate whether the proposed project would include a diesel generator.

⁴ Student housing, group housing, dorms, etc. are all considered "dwelling units" covered by the SF Noise Ordinance and CA Building Code Residential Standards.

Finally, *Eastern Neighborhoods PEIR Noise Mitigation Measure F-6: Open Space in Noisy Environments* would apply to the proposed project because it includes new development of a noise-sensitive use. This mitigation measure requires that open space required under the Planning Code be protected from existing ambient noise levels. Implementation of this measure could involve, among other things, site design that uses the building itself to shield on-site open space from the greatest noise sources, construction of noise barriers between noise sources and open space, and appropriate use of both common and private open space in multi-family dwellings, and implementation would also be undertaken consistent with other principles of urban design.

- 6. Air Quality.** The proposed project, with 50 dwelling units, is below the Bay Area Air Quality Management District's (BAAQMD) construction and operation screening levels for criteria air pollutants.⁵ However, detailed information related to the volume of excavation will be required in order to complete the environmental analysis. Please provide this information as a supplement to the EEA.

If the project would generate new sources of toxic air contaminants including, but not limited to, emissions from 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 and additional measures will likely be required to reduce stationary source emissions. Based on the information in the PPA application, the proposed project likely would not require a backup diesel generator, but this information shall be provided as a supplement to the EEA.

In addition, project-related demolition, excavation, grading and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. To reduce construction dust impacts, the 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 Department of Public Health (DPH).

The project site is not 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. Therefore, the project will not be required to submit an Article 38 application to DPH.

- 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

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

Analysis Compliance Checklist.⁶ 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.** The proposed project would involve construction of a building less than 80 feet in height. Therefore, a wind analysis is not required.
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 Jackson Playground, a SF Recreation and Park property subject to Planning Code Section 295. (For more information on Section 295, see "Preliminary Project Comments" below.) 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=8442>). A separate fee is required. Additional information on the Shadow Analysis and scope of this analysis is available at: [http://www.sf-planning.org/ftp/files/publications reports/Shadow Analysis Memo-07-10-14.pdf](http://www.sf-planning.org/ftp/files/publications%20reports/Shadow%20Analysis%20Memo-07-10-14.pdf)
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.⁷ A geotechnical study prepared by a qualified consultant must be submitted with the EEA, or as a supplement if an EEA was already submitted. 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.
11. **Hazardous Materials.** The project site is a known existing or former Leaking Underground Fuel Tank (LUFT) site, and is located in an area with known or suspected soil and/or groundwater contamination. Therefore, the project is subject to Article 22A of the Health Code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the 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.

⁶ Refer to <http://sf-planning.org/index.aspx?page=1886> Consultant & Sponsor Resources webpage, under Applications section for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

⁷ San Francisco Planning Department. *Interdepartmental Project Review*. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=522>.

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: https://www.sfdph.org/dph/files/EHSdocs/ehsForms/FormsChemHz/2015-03_Maher_app.pdf. Fees for DPH review and oversight of projects subject to the ordinance would apply. Please refer to DPH's fee schedule, available at: <https://www.sfdph.org/dph/EH/Fees.asp>. Please provide a copy of the submitted Maher Application and Phase I ESA with the EEA or as a supplement if the EEA has already been submitted.

Eastern Neighborhoods EIR Hazardous Materials Mitigation Measure L-1: Hazardous Building Materials 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 building was 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 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. **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:

1. A **Large Project Authorization (LPA)** is required from the Planning Commission per Planning Code Section 329 for the new construction of a building greater than 25,000 gross square feet in the Eastern Neighborhoods Mixed Use Districts. The proposed location of the rear yard is not code-complying and would thus require a rear yard modification, under the LPA.
2. A **Conditional Use Authorization** is required from the Planning Commission per Planning Code Section 843.45 for all retail sales and services over 4,000 gross square feet in the Urban Mixed Use District.
3. A **Building Permit Application** is required for the demolition of the existing building on the subject property.
4. A **Building Permit Application** is required for the proposed new construction on the subject property.

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

Neighborhood Notification (312). In all UMU and Eastern Neighborhoods Mixed Use Districts all building permit applications for a change of use shall be subject to the provisions of *Planning Code* section 312. Upon determination that an application is in compliance with the development standards of the Planning Code, the Planning Department shall cause a written notice to be posted on the site, describing the proposed project and to be sent to the notification group. The notification area shall be all properties

within 150 feet of the subject lot in the same Assessor's Block and on the block face across from the subject lot.

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 in seismic hazard zones, in which the subject property falls. An application is available online at <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=522>.
2. **Showplace Square/Potrero Hill Area Plan.** The subject property is within the area covered by the Showplace Square/Potrero Hill Area Plan in the General Plan. The project is within the "Urban Mixed Use" zoning district, an area historically known for PDR, design, and other creative commercial activities. The Area Plan seeks to build on this character in this zoning district while expanding residential and mixed-use development, and the provision of comprehensive public benefits that together enhance the overall quality of life in the neighborhood. As proposed, the project is generally consistent with the overarching objectives of the Plan, though the Department offers several suggestions and recommendations in this in this document discuss to help the project best align with the Plan's policies, Code standards, and general intentions.

While the land use program is generally consistent with the UMU Use District, and therefore the general intent of the Land Use policies within the aforementioned area plan, aspects of the project's current design (discussed further below) may require changes and further evaluation to assure they sufficiently meet other Showplace Square/Potrero Hill Area Plan's policies and objectives. Some of the objectives for which the current design will need further evaluation include:

- Objective 1.1: Encourage the transition of portions of Showplace/Potrero to a more mixed use and neighborhood-serving character, while protecting the core of design-related PDR uses.
- Objective 1.5: Minimize the impact of noise on affected areas and ensure General Plan noise requirements are met. Please refer to the Noise Regulations near Places of Entertainment below for further information.
- Objective 1.7: Retain the role of Showplace Square as an important location for Production, Distribution, and Repair (PDR) activities, focusing in particular on design related activities.
- Objective 3.1: Promote an urban form that reflects Showplace Square and Potrero Hill's distinctive place in the city's larger form and strengthens its physical fabric and character.
- Objective 4.4: Support the circulation needs of existing and new PDR uses in Showplace Square/Potrero Hill.

The project sponsor is encouraged to read the full plan, which can be viewed at: http://www.sf-planning.org/ftp/General_Plan/Showplace_Square_Potrero.htm#SHP_LUS_2. These design changes

to meet Plan objectives should be addressed in the formal plan set submittal or the required findings for the Large Project Authorization or Conditional Use Authorization.

3. **Student Housing.** Per Planning Code Section 102, student housing is a Residential Use characteristically defined as a living space for students of accredited Post-Secondary Educational Institutions that may take the form of Dwelling Units, Group Housing, or SRO Unit and is owned, operated, or otherwise controlled by an accredited Post-Secondary Educational Institution. Unless expressly provided for elsewhere in this Code, the use of Student Housing is permitted where the form of housing is permitted in the underlying Zoning District in which it is located. Student Housing may consist of all or part of a building, and Student Housing owned, operated, or controlled by more than one Post-Secondary Educational Institution may be located in one building. SRO units are not permitted in the UMU zoning district. Based on the interior unit configurations provided, 75 Arkansas Street would be considered group housing, with the exception of the typical studio layout measuring 336 SF. The proposed studio configuration measuring less than 350 SF is considered an SRO Unit and would need to be reconfigured to ensure a code-complying size. Please demonstrate compliance with the definition of student housing by ensuring the proposed project is either owned, operated, or controlled by a Post-Secondary Educational Institution with code-complying unit sizes.
4. **Retail.** In regards to the proposed ground floor retail, the Department (and Area Plan) recommends the project sponsor consider a mix of uses that reflect the history and character of the neighborhood, as well as help activate street life and create a more pleasing pedestrian environment. In addition to the design and architecture suggestions, discussed elsewhere in this document, the Department would suggest the inclusion of PDR uses (art activities, light manufacturing, or trade shops) along with retail uses that would meet daily needs (café, health services, local grocery, etc.). Given the proposed design, there is also the opportunity to create synergies between the interior courtyards and ground-floor retail; e.g. café seating, outdoor art production and display spaces.
5. **Rear Yard.** Per Planning Code Sections 134 and 843.04, the project is required to provide a rear yard of at least 25 percent of the lot depth, extending the full width of the lot. Because this project is located on a corner site, one of the street frontages (17th Street or Arkansas Street) must be designated as the front of the property, and the rear yard would then be provided based on that determination. The Planning Department holds the discretion to determine where the rear yard is located, for the purposes of calculating the requirement. The “interior courtyards” configuration proposed for the rear yard is not permitted in Eastern Neighborhood Mixed Use Districts, except as an approved modification through the Large Project Authorization process. Further information and/or adjustment of the plans may be needed to determine how the proposal meets code definitions and conforms to Planning Code requirements. A minimum of 25 percent of the lot area is required (200' x 110', 22,000 square feet); the proposed rear yard, at 5,568 square feet, represents 25.3% percent of the lot area, where 5,500 square feet is required.
6. **Open Space – Residential.** Planning Code Sections 135 and 843.11 outline the requirements for usable open space for group housing. The minimum amount of usable open space provided for use by each bedroom shall be one-third the amount required for a dwelling unit as specified in Table 135B. For purposes of these calculations, the number of bedrooms on a lot shall in no case be

considered to be less than one bedroom for each two beds. The proposed 252 beds would be considered 126 bedrooms for the purposes of calculating usable open space. Generally, at least 80 square feet of private (per dwelling unit) is required for each residential unit in an UMU zoning district if private, 54 square feet if publicly accessible. The proposed interior courtyards with a cumulative 5,568 square feet satisfy the minimum requirements for open space. 126 proposed bedrooms, 80 square feet and divided by one-third would result in 3,360 square feet of required usable open space. To assist in the review of this proposal, please identify the number of bedrooms and/or beds, the amount of private open space, common open space, and the overall dimensions for all open space elements on the project site in your formal submittal.

7. **Open Space – Non-Residential.** Planning Code Section 135.3 requires the project to provide one foot of open space for every 250 square feet of retail (and similar) uses. The proposal includes 7,814 square feet of retail sales and service space; therefore, 31 square feet of open space would be required for the retail use. Please demonstrate where this usable open space is being provided on site. Alternatively, per Section 426, an in-lieu fee of \$92.23 per square foot may be paid instead of providing the open space on site per the current SF DBI fee register, which is updated annually.
8. **Street trees.** The Department of Public works requires the planting of Street Trees pursuant to Article 16, Section 805(a) and (d) and 806 (d). Generally, one street tree for every 20 feet of frontage for new construction will be required. You may contact Carla Short at the Public Works for additional information (carla.short@sfdpw.org). You may also view the code requirements at the following link: [view the requirements at the following link: http://www.amlegal.com/nxt/gateway.dll/California/publicworks/article16urbanforestryordinance?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:sanfrancisco_ca\\$anc=JD_806](http://www.amlegal.com/nxt/gateway.dll/California/publicworks/article16urbanforestryordinance?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$anc=JD_806).
9. **Streetscape Plan.** The Showplace Square/Potrero Area Plan prioritizes an improved public realm (especially for pedestrians and cyclists) and “green” connections to transit (16th Street bus routes) and open spaces (Jackson Park / Playground). Per the standards outlined in Planning Code Section 138.1, projects that propose 250 feet or more of total lot frontage on one or more publicly-accessible rights-of-way (75 Arkansas has 310’) along with new construction are required to submit a Streetscape Plan that ensures any new public realm, sidewalks, pedestrian elements, etc. conform with the Department’s Better Street Plan. This Streetscape Plan shall be submitted to the Planning Department no later than 60 days prior to any Planning Commission action, and shall be considered for approval at the time of other project approval actions. The streetscape plan should show the location, design, and dimensions of all existing and proposed streetscape elements in the public right-of-way directly adjacent to the fronting property, including 12–15’ sidewalk widths for mixed-use development, street trees (appropriate street tree types, planted 1 per every 20 feet of linear development), sidewalk landscaping (including low-impact-development stormwater management strategies), street lighting, site furnishings, utilities, driveways, and curb lines, and the relation of such elements to proposed new construction and site work on the property. Please see the Department’s Better Streets Plan and Section 138.1(c)(2)(ii) www.sfbetterstreets.org for the additional elements that may be required as part of the project’s streetscape plan. The Streetscape Plan will be presented to the Streetscape Design Advisory Team for their review. If street

improvements are being considered, project sponsors should contact Public Works as early as possible to understand the process and requirements for permitting street improvements.

10. **Vision Zero.** 16th Street has been identified as a high-injury corridor as part of San Francisco's Vision Zero Program, a commitment to eliminating injuries and deaths of anyone using city streets and sidewalks (pedestrians, cyclists, motorists, etc.). The sponsor is encouraged to incorporate pedestrian and bicyclist safety streetscape measures into the project, including connections to Jackson Park, 16th street, and at its Class I bicycle parking entrance(s).
11. **Bird Safety.** Planning Code Section 139 includes feature-related standards for Bird-Safe buildings. Depending on the proposed glazing in the formal submittal, the project may be required to implement Bird-Safe measures into the façade glazing. Please refer to Section 139 and the Planning Department webpage at <http://www.sf-planning.org/index.aspx?page=2506> for further information. The formal plan submittal will need to include details and specifications to demonstrate that the project complies with the requirements of the Planning Code.
12. **Exposure.** Group Housing must comply with exposure requirements for dwellings. Planning Section 140 requires that each dwelling unit have at least one room that meets the 120-square-foot minimum superficial floor area requirement of Section 503 of the Housing Code face directly on a street right-of-way, code-complying rear yard, or an appropriately sized courtyard. Though the proposed rear yard is not code-complying because of its location, it does provide large enough courtyards to meet the exposure requirement for those units that only have windows fronting the courtyards.
13. **Street Frontages in Mixed Use Districts.** Per Planning Code Section 145.1, the proposed ground floor ceiling height of 17 feet is compliant as that height is required in the UMU district. Upon submittal, demonstrate compliance with street-facing ground level spaces, transparency and fenestration requirements of the Planning Code. The conceptual elevations submitted thus far do not indicate whether these requirements are met.
14. **Off-Street Parking and Curb Cuts.** Planning Code Sections 151.1 and 843.10 do not require any off-street parking within the UMU zoning district. Providing the new curb cut at 20 feet in width exceeds the suggested width dimension of 10 feet. Aside from the impacts on pedestrians, bicyclists, and overall design, the extraordinarily wide curb cut would unnecessarily remove additional on-street parking. Therefore, the Department would not support the curb cut as proposed.
15. **Off-Street Freight Loading.** Per Planning Code Section 152.1, there is no off-street freight loading space required if a retail use is less than 10,000 square feet of gross floor area. The proposed retail area of 7,814 square feet does not require loading area. Please consider proposing a more active use for that space.
16. **Bicycle Parking.**
Residential. Planning Code Sections 155.2 and 843.07 outline the bicycle parking requirements for Class I and Class II bicycle parking spaces for dwelling units and retail sales uses. The residential use of the proposed project, with 252 beds, is considered group housing but more specifically, student