



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

DATE: June 27, 2016  
TO: Terezia Nemeth, Alexandria Real Estate Equities, Inc.  
FROM: Joshua Switzky, Planning Department  
RE: PPA Case No. 2015-012490PPA for 88 Bluxome Street

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

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

  
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Joshua Switzky, Senior Planner





# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Project Assessment

*Date:* June 27, 2016  
*Case No.:* **2015-012490PPA**  
*Project Address:* 88 Bluxome Street  
*Block/Lot:* 3786/037  
*Existing Zoning:* WMUO (Western SoMa Mixed-Use Office) Zoning District  
Western SoMa SUD and Fringe Financial Service Restricted Use Dist.  
65-X Height & Bulk District  
*Area Plan:* Western SoMa / Central SoMa Plan (Draft)  
*Project Sponsor:* Terezia Nemeth, Alexandria Real Estate  
415-321-3808  
*Staff Contact:* Lisa Chen – 415-575-9124  
[lisa.chen@sfgov.org](mailto:lisa.chen@sfgov.org)

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### DISCLAIMERS:

This Preliminary Project Assessment (PPA) letter provides feedback to the project sponsor from the Planning Department regarding the proposed project described in the PPA application submitted on March 28, 2016, 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 proposed project would demolish the existing 288,570 square foot Bay Club Tennis building and construct three buildings totaling 1,053,660 GSF over a podium with two basement levels, a public mid-block pedestrian pathway and a community garden. The two proposed office towers are approximately 250 feet and 158 feet in height and would include a total of 870,540 GSF of office space, 52,100 GSF of

production distribution and repair (PDR) space (of which approximately 42,700 GSF is located in the first basement level), 30,650 GSF of ground floor retail, of which 16,150 GSF is planned as a fitness center, and two stories of basement parking and off-street loading totaling 62,620 GSF. The third building is 27' tall and would include a 26,900 GSF public community/recreation center, a 10,850 GSF child care facility, and public open space along the southwest corner of the property, proposed as a community garden. A portion of the parcel on the northwest corner at 5<sup>th</sup> and Brannan Streets (totaling 8,550 sf) is proposed as a Land Dedication site for Affordable Housing, shown as a 78'-tall building that is situated adjacent to and partially on top of the Community/Recreation Center and Child Care building. This Preliminary Project Assessment evaluates the affordable housing building as proposed for the purposes of discussing overall site design, land uses, and height and bulk, with the understanding that the affordable housing project would be developed further at the discretion of the City by a separate project sponsor.

The project would place approximately 168 parking spaces on the second basement level, 210 Class I bike spaces and nine off-street loading spaces on the first basement level, and 36 Class I bike spaces on the ground level. Entry to the garage would be provided by a new curb cut on Bluxome Street. An unspecified number of Class II bike spaces would be provided along the through-block pedestrian connection.

## BACKGROUND:

The proposed project is located within the Eastern Neighborhoods Area Plan, which was evaluated in the *Eastern Neighborhoods Rezoning and Area Plans Programmatic Final Environmental Impact Report (Eastern Neighborhoods PEIR)*, certified in 2008.<sup>1</sup> The project site also lies within the proposed Central SoMa Plan area, which is the focus of an ongoing community planning process initiated in 2011. The Central Corridor Plan Draft for Public Review<sup>2</sup> (Draft Plan) was released in April 2013, with proposed changes to the allowed land uses and building heights in the Plan area, including a strategy for improving the public realm within the Plan area and vicinity. The Draft Plan is available for download at <http://centralsoma.sfplanning.org>. The Central SoMa Plan will be evaluated in an Environmental Impact Report (EIR), which is currently underway. The Draft Plan and its proposed rezoning are anticipated to be before decision-makers for approval in 2016.

Further comments in this Preliminary Project Assessment (PPA) letter are based on the Draft Plan concepts published to date, which are contingent on the approval of the proposed Central SoMa Plan rezoning by the Planning Commission and Board of Supervisors.

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<sup>1</sup> San Francisco Planning Department, *Eastern Neighborhoods Rezoning and Area Plans Programmatic Final Environmental Impact Report (PEIR)*, Planning Department Case No. 2004.0160E. This document is available for review at the 1650 Mission Street, Suite 400, as part of Case No. 2004.0160E.

<sup>2</sup> Please note that the Central SoMa Plan was formerly called the Central Corridor Plan. To avoid ambiguity, this letter uses the current "Central SoMa Plan" when referring to the ongoing planning process, while "Draft Plan" refers to the document published in April 2013 under the name "Central Corridor Plan Draft for Public Review."

**ENVIRONMENTAL REVIEW:**

As discussed under Planning Context, the proposed project is located within the Eastern Neighborhoods Area Plan, which was evaluated in the *Eastern Neighborhoods PEIR*. The proposed project is not consistent with the development density (zoning) identified in the Eastern Neighborhoods Area Plan, and it would not be eligible for a Community Plan Exemption (CPE) under the *Eastern Neighborhoods PEIR*.

The existing zoning for the project site is WMUO (WSMa Mixed Use-Office), which allows office, retail, institutional (including child care and community facilities), and Production, Distribution and Repair (PDR) uses, such as those proposed for the project site. The existing height and bulk designation for the project site is 65-X. The proposed project would include three buildings over a podium, at heights of approximately 250 feet (Building 1), 158 feet (Building 2), and 78 feet (Building 3). Therefore, the proposed office, PDR, and retail uses would be consistent with the uses as allowed by the existing zoning for the project site, but not the height and bulk designation. Further, it should be noted that the Western SoMa SUD requires a conditional use authorization for the demolition of any existing recreational facilities in the district, which may only be granted on the condition that the project sponsor demonstrates that the needs currently met by the recreational facility proposed for demolition can be met by other facilities within the boundaries of the SUD. In order for the proposed project to meet this requirement, the Planning Commission would need to find that the alternate recreational facility will provide similar facilities, services, and affordability as the recreational facility to be removed.

Under the proposed Central SoMa Plan, the proposed use district for the project site is MUO (Mixed-Use Office), which would also allow office, retail, institutional, and PDR uses. Thus, the proposed uses would continue to be consistent with the zoning currently being analyzed for the project site under the Central SoMa Plan EIR. The Central SoMa Plan EIR will study the Draft Plan's Mid-Rise Height Alternative and a modified High-Rise Height Alternative. Under the Mid-Rise Height Alternative the proposed height and bulk designation would be 85P/160T for the western portion of the site and 85-130 for the eastern portion of the site. Under the modified High-Rise Height Alternative the proposed height and bulk designation would be 85P/200T for the western portion of the site and 85-130 for the eastern portion of the site. As such, Buildings 1 and 2 would not be consistent with the height and bulk designation being analyzed in either the Mid-Rise and High-Rise Height Alternatives currently being evaluated under the Central SoMa Plan EIR, while Building 3 would be consistent with both alternatives.

Due to the project's location within the geographic area evaluated in the *Eastern Neighborhoods PEIR*, any development on the project site would potentially be subject to the mitigation measures identified in that document. However, mitigation measures from the *Eastern Neighborhoods PEIR* that are applicable to the proposed project area could be refined, augmented, or superseded under the future Central SoMa Plan EIR, which would become applicable to the proposed project if the Draft Plan is approved.

If the Central SoMa EIR is certified and the Plan and rezoning are approved by the Planning Commission and Board of Supervisors, the proposed project will be assessed based on the zoning district controls for the project site in place at such time that Planning Department entitlements for the proposed project are sought. If the proposed project is consistent with the development density analyzed in the Central SoMa Plan and EIR, it would be eligible for a 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 entitlement 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 forthcoming Central SoMa Plan EIR, and there would be no new "peculiar" significant impacts unique to the proposed project. In these situations, all pertinent mitigation measures and CEQA findings from the Central SoMa Plan EIR would be 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 are not identified in the forthcoming Central SoMa Plan EIR, and if these new significant impacts can be mitigated to a less-than-significant level, then a focused mitigated negative declaration is prepared to address these impacts, and a supporting CPE checklist is prepared to address all other impacts encompassed by the Central SoMa Plan EIR, with all pertinent mitigation measures and CEQA findings from the Central SoMa Plan EIR also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,659) and (b) the standard environmental evaluation fee (which is based on construction value).
3. **Focused EIR.** If any new site- or project-specific significant impacts cannot be mitigated to a less-than-significant level, then a focused EIR is prepared to address these impacts, and a supporting CPE checklist is prepared to address all other impacts encompassed by the forthcoming Central SoMa Plan EIR, with all pertinent mitigation measures and CEQA findings from the Central SoMa Plan EIR also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,659); (b) the standard environmental evaluation fee (which is based on construction value); and (c) one-half of the standard EIR fee (which is also based on construction value). An EIR must be prepared by an environmental consultant from the Planning Department's environmental consultant pool ([http://www.sfplanning.org/ftp/files/MEA/Environmental\\_consultant\\_pool.pdf](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.

If the proposed project is not consistent with the development density identified for the project site in the adopted Central SoMa Plan, the proposed project would be precluded from qualifying for a CPE under the Central SoMa Plan. The proposed project would be analyzed in a separate environmental document that would not rely on the environmental analysis undertaken for the Central SoMa Plan. The proposed project would require environmental review individually, with either a project-specific Initial Study/Mitigated Negative Declaration or Environmental Impact Report (EIR). In this case, the applicable fees would be (a) the standard environmental evaluation (EE) fee based on the cost of construction; and (b) the standard EIR fee, if an EIR is required.

If it is determined that the project could result in a significant impact, an initial study would be prepared. The initial study may be prepared either by an environmental consultant from the Department's environmental consultant pool or by Department staff. Should you choose to have the initial study

prepared by an environmental consultant, contact Devyani Jain at (415) 575-9051 for a list of three eligible consultants. If the initial study finds that the project would have a significant impact that could be reduced to a less-than-significant level by mitigation measures agreed to by the project sponsor, then the Department would issue a preliminary mitigated negative declaration (PMND). The PMND would be circulated for public review, during which time concerned parties may comment on and/or appeal the determination. If no appeal is filed, the Planning Department would issue a final mitigated negative declaration (FMND). Additional information regarding the environmental review process can be found at: <http://www.sf-planning.org/modules/showdocument.aspx?documentid=8631>.

If the initial study indicates that the project would result in a significant impact that cannot be mitigated to below a significant level, an EIR will be required. 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](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](http://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.<sup>3</sup>

One important item of consideration for the environmental review would be the proposed phasing of the development of the project site; specifically what is being termed as the "future affordable housing development." The EEA application for the project at 88 Bluxome Street should include the future affordable housing development as a part of the overall project description. For purposes of the EEA application, the sponsor should include information on height, square footage, unit mix, unit count, open space, and parking based on the maximum density allowable on the site. The Planning Department would analyze the future affordable housing development as part of the entire proposed project during the environmental review process.

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 dated October 19, 2015. The following discussion is also based on the project sponsor's intention to obtain a CPE under the future Central SoMa Plan EIR. As such, *Eastern Neighborhoods PEIR* mitigation measures are not included in the discussion below because it is unlikely the proposed project would be analyzed under the *Eastern Neighborhoods PEIR*.

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

1. **Historic Resources.** The existing building on the project site is less than 45 years of age and was determined not to be located in a historic district in the South of Market Historic Resources Survey. 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.** Project implementation would entail soil-disturbing activities associated with building construction, including excavation that would reach a depth of approximately 35 feet below grade. Therefore, the proposed project would likely require a 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. 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 Planning Department's Transportation Impact Analysis Guidelines for Environmental Review,<sup>4</sup> the project would 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 Vinaliza Byrd at (415) 575-9025 to arrange payment. Once you pay the fees, please contact Manoj

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



Madhavan at (415) 575-9095 or [manoj.madhavan@sfgov.org](mailto:manoj.madhavan@sfgov.org) so that he can provide you with a list of three consultants from the pre-qualified Transportation Consultant Pool. Upon selection of a transportation consultant, the Department will assign a transportation planner who will direct the scope of the consultant-prepared study.

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

- Consider reducing the proposed parking, as the project site is well served by transit.
- Coordinate proposed activities with other projects in the area.

#### *Transportation Demand Management Program*

On April 28, 2016, the Planning Commission adopted a resolution to initiate Planning Code amendments that would require development projects to comply with a proposed Travel Demand Management (TDM) Program. The intent of the proposed TDM Program is to reduce vehicle miles traveled (VMT) and make it easier for people to get around by sustainable travel modes such as transit, walking, and biking.

Under the proposed TDM Program, land uses are grouped into four categories, A through D. For each land use category that is subject to the TDM Program, the City would set a target based on the number of accessory vehicle parking spaces that the project intends to provide for that land use category. To meet each target, the project sponsor must select TDM measures—each worth a specified number of points—from a menu of options. In general, if a project sponsor proposes more parking, the target for that land use category—and thus, the number of TDM measures that the sponsor must implement to meet it—would increase. Some of the TDM measures included in the menu are already required by the Planning Code. Points earned from implementing these measures would be applied towards achieving a project's target(s). Project sponsors would be required to implement and maintain TDM measures for the life of the project.

The proposed project would include 30,650 sf of retail (including a fitness center), 870,540 sf of office, 52,100 sf of PDR, a 26,900-sf community center, a 10,850-sf day care, 168 off-street vehicle parking spaces, and nine off-street loading spaces, and thus would be subject to the proposed TDM Program.

Based on the proposed 39 parking spaces associated with the retail, fitness center, and community center uses, the project would be required to meet or exceed a target of 31 points for land use Category A (Retail). Based on the proposed 85 parking spaces associated with the office and childcare uses, the project would be required to meet or exceed a target of 20 points for land use Category B (Office). Based on the proposed 35 parking spaces associated with the PDR use, the project would be required to meet or exceed a target of 3 points for land use Category D (Other).

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

The Planning Code would currently require the project, as described in the PPA, to provide the following TDM measures:

- Bicycle Parking (Planning Code Section 155.2; TDM Menu ACTIVE-2 – option a)
- Shower facilities and lockers (Planning Code Section 155.4; TDM Menu ACTIVE-3)
- Transportation demand management programs (Planning Code Section 163; TDM Menu INFO-3)
- Car Share Parking Spaces (Planning Code Section 166; TDM Menu CSHARE-1 – option a)

The project may be required to select and incorporate additional TDM measures to meet the targets listed above. A full list of the TDM measures included in the menu of options is available on this [website](#). Once assigned, the environmental planner will provide additional guidance regarding the proposed TDM Program and next steps.

5. **Noise.** Construction noise would be subject to the San Francisco Noise Ordinance (Police Code Article 29), which includes restrictions on noise levels of construction equipment and hours of construction. If pile driving is to be used during construction, measures to reduce construction noise may be required as part of the proposed project. The EEA should indicate whether pile driving or other particularly noisy construction methods are required. In addition, construction of the proposed project would occur in proximity to noise-sensitive receptors on 5th and Bluxome Streets. Therefore, the project sponsor would likely be required to develop a set of site-specific construction noise attenuation measures under the supervision of a qualified acoustical consultant. Detailed information related to construction equipment, phasing and the duration of each phase shall be provided during the environmental review in order to assess construction noise levels and methods to reduce such noise, as feasible.

Operation of the proposed project's recreation center, PDR space, and child care open space may generate noise that could result in a substantial permanent increase in ambient noise levels. The proposed project would likely require a noise study that includes at a minimum: measurements of the existing noise environment, discussion of applicable noise regulations, analysis of the project's noise effects and the ability of noise sources to meet applicable noise standards. The noise study shall be conducted by a qualified acoustical consultant who shall prepare a noise study scope of work for approval by the assigned environmental coordinator prior to conducting the study.

6. **Air Quality.** The proposed project's 870,540 sf of office use exceeds the Bay Area Air Quality Management District's (BAAQMD) construction and operational screening levels for criteria air pollutants.<sup>6</sup> Therefore, an analysis of the project's criteria air pollutant emissions is likely to be required. Please provide detailed information related to construction equipment, phasing and duration of each phase, and volume of excavation as part of the EEA.

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

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<sup>6</sup> BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3.

San Francisco Building Code Section 106.A.3.2.6. The intent of the Ordinance is to reduce the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of on-site workers, minimize public nuisance complaints, and avoid orders to stop work by the Department of Building Inspection (DBI). Pursuant to the Construction Dust Ordinance, the proposed project would be required to prepare a Construction Dust Control Plan for review and approval by the San Francisco Department of Public Health (DPH) or comply with applicable dust control requirements outlined in the ordinance.

The Air Pollutant Exposure Zone (APEZ) identifies areas with poor air quality based on an inventory and modeling assessment of air pollution, exposures, and health vulnerability from mobile, stationary, and area source emissions within San Francisco. The project site is not located within an APEZ, as mapped and defined by Health Code Article 38. As such, additional measures or analysis related to local health risks are not likely to be required. However, if the project would include 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. Detailed information related to any proposed stationary sources must be provided 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.<sup>7</sup> 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 two buildings over 80 feet in height. The project will therefore require a consultant-prepared wind analysis, which may include wind tunnel analysis if needed. The consultant will be required to prepare a proposed scope of work for review and approval by the environmental planner prior to proceeding with the analysis.
9. **Shadow.** The proposed project would result in construction of three buildings greater than 40 feet in height. A preliminary shadow fan analysis prepared by Planning Department staff indicates that the proposed project would not cast new shadows on Recreation and Parks Commission property or other existing public open spaces. However, preliminary shadow analysis indicates that the project would likely cast shadows on new public open spaces that may be constructed as a result of the Central SoMa Plan. Additional shadow analysis may be needed after Plan adoption. (See Preliminary Project Comments below for additional information.)

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

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.<sup>8</sup> A geotechnical study prepared by a qualified consultant must be submitted with the EEA. The study should address whether the site is subject to liquefaction, and should provide recommendations for any geotechnical concerns identified in the study. In general, compliance with the building codes would avoid the potential for significant impacts related to structural damage, ground subsidence, liquefaction, landslides, and surface settlement. To assist Planning Department staff in determining whether the project would result in environmental impacts related to geological hazards, it is recommended that you provide a copy of the geotechnical information with boring logs for the proposed project. This study will also help inform the Planning Department Archeologist of the project site's subsurface geological conditions.
11. **Hazardous Materials.** The proposed project would disturb an estimated 443,350 cubic yards of soil in order to accommodate the proposed basement levels. The project site is also in a Maher Area, which indicates the potential presence of soil and/or groundwater contamination. Therefore, the proposed 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 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.

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

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

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.sfetethics.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. **Rezoning.** The project site is located within the WMUO (Western SoMa Mixed-Use Office) District. Under the existing WMUO zoning district, the proposed office, industrial and retail uses would be allowed, though the retail uses would be subject to a size restrictions of 25,000 gross square feet as described further below. The zoning concepts included in the Central SoMa Draft Plan indicate that a reclassification to MUO (Mixed Use Office) is being considered for the site. Under the MUO zoning district, the proposed office, industrial and retail uses would also be permitted. Retail uses up to 25,000 gross square feet per lot are principally permitted. Retail uses larger than 25,000 gross square feet per lot would be permitted only if the ratio of other permitted uses to retail is at least 3:1. Please see further discussion in the Preliminary Project Comments section.
2. **Height District Reclassification.** The project site is located within the 65-X height and bulk district. In order for the project to proceed, the Board of Supervisors would need to approve a Height District Reclassification for the subject parcel. The "High Rise Alternative" zoning proposal published in the Central SoMa Draft Plan indicates that height limits of 85P/200T on the western portion of the site and 85-130 on the eastern portion of the site are being considered. This proposal is being analyzed in the Central SoMa Plan EIR, but this analysis is not an indication that the height will ultimately be adopted as part of the Plan, nor does it guarantee that the Planning or the Board of Supervisors will approve changes to height limits. The proposed project would not conform with these alternatives. Please see further discussion in the Preliminary Project Comments section.

1. **Conditional Use Authorization** from the Planning Commission is required per Planning Code Section ("Section") 823 and 303 in order to demolish an existing recreational facility in the Western SoMa Special Use District. The Central SoMa Plan, if adopted, would remove the site from the Western SoMa Special Use District. The proposed Plan might not retain the requirement that projects resulting in demolition of existing private recreational facilities must seek a Conditional Use Authorization.
3. **Large Project Authorization** from the Planning Commission would be required per Planning Code Section 329 for the new construction of a building greater than 75 feet in height and greater than 25,000 gross square feet in the Eastern Neighborhoods Mixed Use districts.
4. An **Office Allocation** from the Planning Commission is required per Planning Code Section 321 for the development of office space in excess of 25,000 square feet.
5. A **Building Permit Application** is required for the demolition of the existing building on the subject property.
6. A **Building Permit Application** is required for the proposed new construction on the subject property.

#### NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

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

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

The project is located within the Eastern Neighborhoods Mixed Use District and requires **Neighborhood Notification** to owners and occupants within 150 feet of the project site prior to approval of the site permit, in accordance with Planning Code Section 312.

**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 significantly impact the proposed project.

1. **Western SoMa Area Plan/Existing Zoning & Height/Bulk.** The subject property falls within the area covered by the Western SoMa Area Plan in the General Plan. As proposed, the project is generally consistent with some overarching objectives of the Plan but inconsistent with other key provisions, as discussed below. The subject property is zoned as a West SoMa Mixed Use – Office (WMUO) district, which allows housing and various commercial uses, including the proposed office, retail, and PDR use. However, retail uses above 25,000 gross square feet are not permitted in the WMUO zoning district. The property is located within the Western SoMa Special Use District (SUD) and is required to be consistent with the design policies and guidelines of the “WSMa Design Standards.” It is also located within the 65-X height and bulk district, which does not permit the project’s proposed height and bulk. *The project could not be approved under existing zoning.* The project sponsor is encouraged to read the full plan, which can be viewed at:

[http://www.sf-planning.org/ftp/General\\_Plan/Western\\_SoMa\\_Area\\_Plan.pdf](http://www.sf-planning.org/ftp/General_Plan/Western_SoMa_Area_Plan.pdf)

In addition, per Planning Code Section 823, the Western SoMa SUD requires that any project which would demolish existing recreational facilities in the district seek a conditional use authorization from the Planning Commission. In order to approve the project, the Commission must make a finding that the project sponsor can demonstrate that the loss of the recreational facility and the associated services to the neighborhood or to existing users can be met by other recreational facilities that: are either existing or proposed as part of the project, are within the boundaries of the Western SoMa Special Use District, and will provide similar facilities, services and affordability as the recreational facility to be removed. As noted previously, the draft Central SoMa plan would remove this parcel from the Western SoMa SUD and may not create a similar requirement in the proposed zoning.

2. **Central SoMa Area Plan.** The subject property falls within the area covered by the Central SoMa Area Plan study area proposed for adoption in the General Plan (published as the draft Central Corridor Plan in April 2013), generally bounded by 2<sup>nd</sup>, 6<sup>th</sup>, Townsend and Market Streets. The Draft Plan will be evaluated in an Environmental Impact Report (EIR). The Draft Plan proposes changes to the allowed land uses and building heights, and includes a strategy for improving the public realm in this area. The certification of the EIR, and adoption of the Plan and the proposed rezoning and affiliated Code changes are anticipated to be before decision-makers for consideration of approval in 2017.

The Central SoMa Draft Plan includes recommendations for new land use controls as well as new height and bulk controls for the subject property. As proposed, the project is generally consistent with the overarching objectives of the Plan, though the project and design comments below discuss any items where more information is needed to assess conformity with either specific policies or Code standards or where the project requires minor modification to achieve consistency. The project sponsor is encouraged to read the full plan, which can be viewed at

<http://centralsoma.sfplanning.org>. Further comments in this PPA are based on the Central SoMa Draft Plan and any Plan refinements posted to the Plan website as of the drafting of this letter.

3. **Land Use.** The draft Central SoMa Plan recommends that the subject property be rezoned to the Mixed-Use Office (MUO) zoning district, in which the proposed office use would be allowed and which would allow for retail uses above 25,000 gross square feet (GSF) per lot if the ratio of other permitted uses to retail is at least 3:1. The office use is generally consistent with key objectives of the proposed Plan, which include providing support for substantial development in a transit-rich area and favoring office development over other kinds of growth, particularly on large parcels. The Plan concepts also include a new Special Use District that would limit new residential development to smaller parcels or, on larger parcels, as a component in a mixed-use project with major commercial development. The proposed project, which consists primarily of office use with additional spaces dedicated to retail, PDR, recreation facilities, community gardens, and affordable housing, is consistent with this proposal.

In addition, the proposed plan calls for a SoMa Entertainment SUD, in which entertainment uses would be permitted. In order to create a diverse and dynamic 24-hour neighborhood characteristic of SoMa, the Plan's preliminary land use principles envision a mixed-use neighborhood in which substantial office development is balanced with retail, arts, entertainment, industrial, and residential uses. The proposed ground floor retail, ground floor PDR, and recreation and child care uses generally support this vision of a mixed-use neighborhood.

The proposal to build 52,200 GSF of PDR uses on site helps achieve another of the Plan's central goals, which is to support a diversity of jobs and businesses in the area. In order to support these goals, the Plan proposes a requirement of at least 0.5 FAR of PDR space in most large commercial developments in the plan area. For more information, see the draft policy document on Production, Distribution and Repair at:

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

Please note that the policy proposal has been refined since publication of this document, such that this WMUO parcel would likely be required to provide 0.5 FAR of PDR space (not 0.25 FAR as noted for large sites that aren't zoned SALI, SLI, or C-3). The project sponsor is encouraged to continue to work with the city to ensure compliance with this policy as it is developed further.

Given this, the proposed PDR space is generally consistent with the intent of the proposed PDR policy, as it would exceed the minimum 0.5 FAR requirement at this site (roughly 48,000 GSF for this 96,500 square foot lot, which excludes the areas proposed for land dedication and the recreation and childcare building). However, the Project Sponsor is encouraged to further explore inclusion of a greater share of the proposed PDR uses at the ground floor, both to improve the quality of this PDR space as well as to create a more diverse set of active uses at grade. Please see the Preliminary Design Comments section for further discussion. As this proposal is still in a preliminary phase, please ensure that the size of the with the PDR replacement requirements that are ultimately adopted.



4. **Office Allocation.** As defined in Planning Code Section 321, the proposed project would need to obtain an Office Development Authorization from the Planning Commission for new construction of over 25,000 GSF of office use. Please note that proposed amount of office use exceeds the annual limit allocation of 875,000 GSF per year for large cap projects (more than 50,000 GSF), such that entitlement of the proposed project in its entirety would depend on the accrual of unused allocations over more than one annual cycle. The Planning Department recommends that the project sponsor monitor the status of the Annual Limit Program at: <http://www.sf-planning.org/index.aspx?page=3254>
5. **Urban Form: Height and Bulk.** In recognition of the desire to accommodate more growth in the area, the draft Central SoMa Plan recommends changing the height limit of a portion of the subject property to 200 feet and a portion to 130 feet. Buildings taller than the width of the abutting street (generally 85' on major streets) will be subject to bulk controls that will be adopted as part of the Central SoMa Plan. The most recent policy position on bulk is contained in the Central SoMa Draft Policy Paper on Bulk,<sup>9</sup> and is reflected in the following comments:
  - a. All buildings along the major streets in Central SoMa area are expected to support the "streetwall" by being built along the property line up to a height of 65 to 85 feet, depending on the width of the street. Along Brannan and 5<sup>th</sup> Streets, which are both 82.5' wide the height of the streetwall should be 85'. Along Bluxome Street, which is 70' wide, the streetwall should be commensurately lower.
  - b. Above 85 feet in height on 5<sup>th</sup> and Brannan Streets and above 65' feet on Bluxome Street, a setback of at least 15 feet will be required along all property lines.
  - c. The "tower" portion of the development is considered all of the development above 85 feet in height for buildings greater than 160 feet in height. For the tower portion, the Central SoMa Plan proposes that the maximum floor size for office uses cannot exceed 17,000 square feet, and that the average floor size cannot exceed 15,000 gross square feet.
    - i. The maximum tower horizontal ("plan") dimension is proposed to be 150 feet, and the maximum diagonal dimension is proposed to be 190 feet.
    - ii. To receive the maximum tower floor plate, the tower must be separated by at least 115 feet from any other towers (i.e., buildings above 160 feet). This tower separation may be reduced to 85 feet if one of the towers has a floor plate less than 10,000 gross square feet. Determining which tower is subject to reduced bulk and height will be based on timing of entitlements considered by the Planning Commission. The second tower that is entitled shall be regulated based on the design of the first.
6. **Sustainability & Central SoMa Eco-District.** The Planning Department has identified the Central SoMa plan area as a Type 2 Eco-District—an infill area composed of many smaller parcels and property owners. An "eco-district" is a neighborhood or district where residents, community institutions, property owners, developers, and businesses join together with city staff and utility providers to meet sustainability goals by formulating a portfolio of innovative projects at a district or

<sup>9</sup> [http://www.sf-planning.org/ftp/files/Citywide/Central Corridor/Central SoMa Draft Policy Paper-Feb2015\\_graphics.pdf](http://www.sf-planning.org/ftp/files/Citywide/Central Corridor/Central SoMa Draft Policy Paper-Feb2015_graphics.pdf)

block-level. The Department sees a special opportunity for new development sites in Central SoMa to exhibit a variety of sustainability best practices including and beyond those required by the Green Building Code and other City and State environmental requirements.

All major new development in the Central SoMa Plan Area will be expected to participate in some capacity in the Eco-District Program and a possible Sustainability Management Association to help guide it. Planning staff are working with other City agencies and the development community to explore both voluntary options and possible new requirements related to renewable energy generation (solar), high performing rooftop uses (renewable energy, living roofs, stormwater management and open space) and non-potable water recycling systems. Additionally, the Planning Department is exploring possibilities for activating and greening land located near and underneath the freeway.

As development in the Plan Area progresses, Department staff is interested in working with development and design teams to help achieve the Area Plan's sustainability goals. Department staff is available to discuss how the project's environmental performance and community benefit may be improved and best contribute to the larger Central SoMa Eco-District. For more information please see:

1. San Francisco Eco-District Program: <http://www.sf-planning.org/index.aspx?page=3051>.
  2. Central SoMa Eco-District Task Force Recommendations Report (2013): [http://www.sf-planning.org/ftp/files/plans-and-programs/emerging\\_issues/sustainable-development/CentralSoMa\\_EcoDTaskForceReport\\_112513.pdf](http://www.sf-planning.org/ftp/files/plans-and-programs/emerging_issues/sustainable-development/CentralSoMa_EcoDTaskForceReport_112513.pdf).
  3. Living Roofs Program: <http://www.sf-planning.org/index.aspx?page=3839>.
7. **Open Space – Non-Residential.** The Draft Central SoMa Plan proposes a requirement that commercial developments include a minimum amount of Privately-Owned Public Open Space (POPOS), similar to those required in the C-3 district, as outlined in Planning Section 138. Provision of this space would be in lieu of meeting the current requirements of Section 135.3. For more information, please see the Central SoMa Policy Paper on POPOS, found here: [http://www.sf-planning.org/ftp/files/Citywide/Central Corridor/Draft CentralSoMa\\_POPOS\\_Policy-November2014.pdf](http://www.sf-planning.org/ftp/files/Citywide/Central Corridor/Draft CentralSoMa_POPOS_Policy-November2014.pdf).

If these requirements are adopted as part of the Plan, such spaces would need to meet specified provisions on accessibility, design quality, and operations and maintenance. Particularly, this policy paper emphasizes the need for the POPOS to be at street level and outdoors, and at a ratio of 1 square foot of POPOS for every 50 square feet of office. As proposed, the project would require 17,411 square feet of POPOS. The proposed project indicates that 6,413 square feet of community garden space and 12,650 square feet of mid-block and street plazas would be provided for a total of 19,063 square feet of open space, which is consistent with this requirement.

In place of the proposed on-site community garden, the Department suggests constructing the linear open space included in the Plan-proposed redesign of Bluxome Street as an "off-site" POPOS, which would help implement a priority of the Central SoMa plan. Amenities in this space could also include community garden plots, dog runs, and other desirable neighborhood amenities. For more

information on the proposed Bluxome Street linear park, see here: <http://www.sf-planning.org/ftp/files/Citywide/Central Corridor/Draft CentralSoMa Bluxome Street Linear Park Policy-January2014.pdf>.

8. **Street Frontages in Mixed Use Districts.** Planning Code Section 145.1 outlines requirements for street frontages to ensure that they are pedestrian-oriented, fine-grained, and are appropriate and compatible with the buildings in MUO Zoning District. Please ensure that the ground floor street frontage meets all of these requirements as related to use, ground floor ceiling height, transparency, fenestration, gates, railings and grillwork.
9. **Horizontal Mass Reduction:** Planning Code Section 270.1 requires a horizontal mass reduction for all new construction projects with street frontage greater than 200-ft in length. The proposed project is required to incorporate a mass reduction that: 1) is not less than 30-ft in width; 2) is not less than 60-ft in depth from the street-facing building façade; 3) extends up to the sky from a level not higher than 25-ft above grade or the third-story, whichever is lower; and 4) results in discrete building sections with a maximum plan length along the street frontage not greater than 200-ft. The project should ensure consistency with this requirement.
10. **Mid-Block Alleys.** Planning Code Section 270.2 requires that new construction on lots greater than 300 linear feet in the Eastern Neighborhoods Mixed Use Districts provide a publicly-accessible mid-block alley for the entire depth of the property and generally located as close to the middle portion of the subject block face as possible. The alley is required to provide pedestrian access, be a minimum of 30 feet in width from building face to building face with a clear walking width of 10 feet free of any obstructions, and be 60% open to the sky including encroachments. New buildings abutting the mid-block alleys shall feature upper story setbacks per Planning Code Section 261.1. Additional standards and requirements are listed in Section 270.2.
11. **Streetscape Plan.** The project is located on a lot that is greater than half an acre of land and proposes the addition of gross floor area greater than 20%, and as such, requires the submittal of a Streetscape Plan to the Planning Department to ensure that the new streetscape and pedestrian elements are in conformance with the Department's Better Streets Plan and the Central SoMa Plan (whose proposed street changes would supersede that of the Better Streets Plan). Along Brannan Street, the Plan proposes reducing the number of vehicle lanes and parking spaces in order to provide wider, well-furnished sidewalks, more frequent crosswalks, and separated cycle tracks in both directions. Along Bluxome Street, the plan proposes converting on-street parking from perpendicular to parallel spaces so that the roadway can be narrowed to allow for a 24' wide linear park along this relatively quiet alleyway. For more information, see Chapter 4 ("Streetscape and Circulation") and Chapter 5 ("Open Space") of the draft Plan. The plan does not include design proposals for 5<sup>th</sup> Street; however, the San Francisco Municipal Transportation Agency (SFMTA) may propose changes to the corridor as part of its broader planning efforts in the South of Market area, and the Project Sponsor should coordinate its streetscape plan with any initiatives that may be underway at the time of the site's development.

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 street trees, sidewalk landscaping, 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) for the additional elements that may be required as part of the project's streetscape plan. For more information, please refer to the Better Street Plan <http://www.sf-planning.org/ftp/BetterStreets/proposals.htm>.

12. **Vision Zero.** In 2014, the SFMTA Board joined the San Francisco Board of Supervisors, SF Planning, SFPD and multiple other city agencies in adopting the City's Vision Zero Policy which seeks to eliminate all traffic deaths in the City by 2024. The City subsequently established a network of Vision Zero Corridors which have higher rates of traffic-related injuries and fatalities compared to most San Francisco Streets. The proposed project is located on a corridor identified as a cyclist "high-injury corridor" (5<sup>th</sup> Street). The Sponsor is encouraged to incorporate pedestrian and bicycle safety streetscape measures into the project. The Department's Streetscape Design Advisory Team (SDAT) may require additional pedestrian safety streetscape measures due to the project's location. More information is available at: <http://walkfirst.sfplanning.org/>.
13. **Shadow Analysis (Section 295).** Section 295 requires that a shadow analysis 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 would not cast new shadow on existing Recreation and Park property.
14. **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, new buildings that exceed a height of 50 feet shall be shaped, consistent with the dictates of good design and without unduly restricting the development potential of the site in question, 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 would likely cast a shadow on open space areas proposed in the Draft Central SoMa Plan. The Draft Plan encourages shadows to be minimized on such new spaces through sculpting of building massing to the degree that such sculpting of the buildings does not substantially sacrifice other important Plan objectives, especially those regarding optimizing land use and generally achieving the building heights and urban form goals envisioned in the Plan.
15. **Off-Street Parking and Loading.** Planning Code Section 151.1 allows up to seven percent of the gross floor area of the offices uses in the MUO zoning district for off-street parking; up to one off-street parking space for each 1,500 square feet of gross floor area of retail use or PDR use; and one off-street parking space for every 25 children for child care use. In addition, off-street loading spaces are required by use type per Planning Code Section 152.1. As the project is refined, a more accurate determination of permitted off-street parking and loading and required off-street loading spaces will be made. Future submittals should clarify the total gross floor area by use type and the total parking proposed to ensure consistency with these requirements. Any parking over the permitted accessory amount would require Conditional Use Authorization.

- 16. Bicycle Parking and Showers.** Planning Code Section 155.2 requires this project to provide Class 1 and Class 2 bicycle parking spaces based on various use types and based on occupied floor area. Showers and clothes lockers would also be required based on occupied floor area per Planning Code Section 155.4. Please refer to "Zoning Administrator Bulletin No. 9 – Bicycle Parking Requirements: Design and Layout" to ensure the project meets the layout requirements. As the project is refined, a more accurate determination of required bicycle parking and showers and clothes lockers will be made. Future submittals should provide the total occupied floor area by use type found in Section 155.2 to ensure consistency with these requirements.
- 17. Car Share Requirements.** Planning Code Section 166 requires one car share parking space for projects proposing at least 50 off-street parking spaces plus one for every 50 parking spaces over 50. Based on the proposal for 195 parking spaces indicated in the PPA application, a total of 4 car share parking spaces would be required. Please indicate the car share parking spaces on the floor plans.
- 18. Transportation Management Program.** Pursuant to Planning Code Section 163, an agreement will be required to be executed with the Planning Department to ensure that transportation brokerage services are provided for the life of the project.

In addition, the Planning Department is currently working on a Transportation Demand Management (TDM) Ordinance which would likely apply to the project. The ordinance is intended to incentivize on-site project amenities to provide sustainable alternatives to driving. A Planning Code Amendment for the TDM Ordinance is currently scheduled for adoption at the Planning Commission in Summer 2016. Please see the Transportation comment in the Environmental Review section above for more information.

- 19. Central SoMa Public Benefits Requirement.** The Central SoMa Plan is considering raising requirements for public benefits commensurate with additional development potential granted by the Plan, which may include additional impact fees and other requirements. For more information, please see the Central SoMa Memo entitled "Potential Public Benefits" ([http://www.sf-planning.org/ftp/files/Citywide/Central\\_Corridor/Central-SoMa\\_Potential-Public-Benefits-Memo.pdf](http://www.sf-planning.org/ftp/files/Citywide/Central_Corridor/Central-SoMa_Potential-Public-Benefits-Memo.pdf)).
- 20. Impact Fees.** This project will be subject to various impact fees, as more fully detailed below. 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. Transportation Sustainability Fee (TSF) (Planning Code Section 411A)
- b. Jobs-Housing Linkage (Planning Code Section 413)
- c. Child-Care (Planning Code Sections 414 & 414A)
- d. Eastern Neighborhoods Impact Fees (Planning Code Section 423)
- e. Public Art (Planning Code Section 429)

21. **Option for In-Kind Provision of Community Improvements and Fee Credits.** Project sponsors may propose to directly provide community improvements to the City. In such a case, the City may enter into an In-Kind Improvements Agreement with the sponsor and issue a fee waiver for the Eastern Neighborhoods Impact Fee from the Planning Commission. This process is further explained in Section 423.3(d) of the Planning Code. More information on in-kind agreements can be found in the Application Packet for In-Kind Agreement on the Planning Department website.
22. **Interdepartmental Project Review.** An Interdepartmental Project Review is required for all new construction that is eight stories or more, or located within a seismic hazard zone, and should be conducted prior to submittal of the development application. An application for the Interdepartmental Project Review is available in the Planning Department lobby at 1650 Mission Street, Suite 400 or at the Planning Information Center (PIC) at 1660 Mission Street, and online at [www.sfplanning.org](http://www.sfplanning.org).
23. **SFPUC Requirements & Project Review.** The SFPUC administers San Francisco's various water, sewer, and stormwater requirements such as the Stormwater Design Guidelines, construction site runoff, sewer connections, recycled water and onsite water reuse, water efficient irrigation, and hydraulic analysis for fire suppression systems. To assist developers and property owners in meeting these requirements, the SFPUC provides project plan review, technical assistance, and incentives. The SFPUC also has a separate project review process for projects that propose to use land owned by the SFPUC or are subject to an easement held by the SFPUC; or projects that propose to be constructed above, under, or adjacent to major SFPUC infrastructure. For projects meeting these criteria, please contact [SFPProjectReview@sfgwater.org](mailto:SFPProjectReview@sfgwater.org) for a SFPUC Project Review and Land Use Application. For more information regarding SFPUC Project Review or any of the SFPUC requirements, please visit <http://www.sfgwater.org/reqs>.
24. **Diaper Changing Stations.** Planning Code Section 168 requires new retail sales and services uses or retail entertainment and recreation uses that are 5,000 square feet or more in size to provide and maintain baby diaper-changing accommodations.
25. **Standards for Bird Safe Buildings.** The Project will be subject to Planning Code Section 139, Standards for Bird Safe Buildings, as it relates to Feature Related Hazards; the Project is not located within 300' of an Urban Bird Refuge and is thus not subject to Location Related Hazards. Please note the Feature Related requirements, under subsection (c)(2).
26. **Electrical Transformer Room.** If a new electrical power transformer is required by PG&E to provide power to the building, please show the location of the transformer room on the plans. SF Public Works typically does not permit new transformer vaults in the public right-of-way. If an exception is requested, a Vault Permit from SF Public Works Bureau of Street Use & Mapping (BSM) will be required.
27. **First Source Hiring Agreement.** A First Source Hiring Agreement is required for any project proposing to construct 25,000 gross square feet or more. For more information, please contact:

Ken Nim, Workforce Compliance Officer  
CityBuild, Office of Economic and Workforce Development

City and County of San Francisco  
50 Van Ness, San Francisco, CA 94102  
(415)581-2303

## PRELIMINARY DESIGN COMMENTS:

The project is located in the proposed Central SoMa Area Plan, currently in progress. The subject site is currently addressed in the Plan's "Key Development Site Guidelines" found on the Planning Department's Central SoMa Plan website: <http://sf-planning.org/central-soma-plan>. The existing neighborhood is primarily commercial and industrial with one- to eight-story buildings that are predominantly brick and masonry in expression. As proposed in the draft Plan, development in the area would increase the prevailing density and height substantially including nearby high-rise construction due to its proximity to the 4th and King Caltrain Station and the coming 4th Street subway. The following comments address preliminary design issues that may significantly impact the proposed project:

1. **Site design, massing, and open space.** The Department generally appreciates the proposed combination of uses, building elements, and neighborhood benefits on the site, including the recreation center, PDR, and affordable housing, but recommends that they be reconfigured to better match the goals of the Central Soma Plan.

As proposed in the draft Plan and being analyzed in the DEIR to be published later this year, the Department recommends reconfiguration of the proposed elements on the site so that the tower is located near the corner of 5th and Brannan Street and the housing component is located towards the center of the block between 5th and 4th Streets. This is for the following reasons:

- Locating the residential uses towards the center of the block between 5th and 4th Streets reflects a typical South of Market pattern wherein lower-scale residential structures are organized and oriented towards the smaller streets and alleys. Locating the housing at the intersection of two major arterials would unnecessarily expose the residents to more traffic noise, light and emissions that would be significantly lessened if located more mid-block and oriented toward Bluxome.
- The distribution of tower locations in the draft Plan is intended to adequately distribute tower structures to maintain generous spacing between them, mark key locations, create a thoughtfully-composed skyline that highlights significant transit infrastructure and avoids shadows on key public spaces (existing and proposed).
- This reconfiguration would facilitate consistency with existing Planning Code policy regarding mid-block alleys and reiterated in the proposed Plan, by shifting the mid-block alley closer to the middle third of the block. This is shown in the Plan's key site guidelines and reflected in the Mid-Block Alleys comment in the Preliminary Project Comments section, above.

Further, the Department cannot support the proposed height and bulk of the tower at this time as it significantly deviates from the proposed height/bulk controls in the draft Plan and being analyzed in the draft Plan DEIR to be published later this year. The site is currently zoned for 65 ft but is

proposed to be up-zoned to 85P/200T and 85-130 with the adoption of the Plan. Bulk controls would limit the tower floorplate to a maximum of 17,000 GSF for office use with a maximum average of 15,000 GSF. The proposed maximum plan length is 150 feet and maximum diagonal of 190 feet. An apparent mass reduction requirement would apply only to the mid-rise portion of the property (ie buildings up to 160'). This would reduce the apparent mass above a height equal to the width of the adjacent street by 85% on Bluxome, 50% on 5th, and 67% on Brannan Streets. Please review the "Bulk" draft policy paper under "Urban Form" on the Central SoMa website for more details, and continue to work with Department staff on the height, bulk, and site design organization as the project moves forward.

2. **Street Frontage.** The Department generally supports the proposed variety of uses currently shown in the ground floor plan as this helps support a natural integration of the project with the larger street and open space network. In combination with the rearrangement of the massing, the Department encourages the further development of the lobby as a "semi-public space"—a pass-thru primarily used by tenants and visitors but also accessible to others in the adjacent neighborhood.

However, the Department does not support the location of the majority of PDR space below grade, and sees this as a missed opportunity to create a more diverse and dynamic mix of active ground floor uses. Some below grade PDR use may be acceptable if the project offers an exceptional design that can provide considerable natural light to the occupied space below grade. Skylights may comprise a portion of proposed daylighting, but some substantial volumetric connections (e.g. courtyards and light wells) would likely be necessary. These apertures between ground and lower levels could work as active or artistic features for the ground level public realm experience as well.

Further, the Department encourages the project to support the Bluxome Street public realm improvements proposed by the Plan by thoughtfully organizing adjacent retail, residential, PDR and recreational uses and including a variety of entrances and exterior amenities facing the street. As the project has significant privately-owned public open space (POPOS) requirements, the Department encourages the applicant to consider alternative ways to fulfill this off-site, including possible improvements of Bluxome Street in fulfillment of the Plan's goal to create a linear park on this corridor.

3. **Architecture.** The Department appreciates the inventive application of apparent mass reduction, as it meets the intention of the proposed controls to facilitate unique architecture mid-rise elements. The Department also appreciates the intent of the design to highlight and introduce character differences between the tower and mid-rise structures. This will assist in demonstrating that these building components are joining a broader and existing urban fabric rather than defining a more insular or homogenous complex of buildings. The Department further supports the playful materiality and medium-scale volumetric expressions in the facades which offer depth and human-scale to the upper levels.

In support of the definition of the "urban room" (in other words, the street environment defined by the building walls and public right-of-way), the Department recommends that the podium or lower portions of the project more closely match the materiality of the existing neighborhood—specifically consider greater solidity through the use of masonry. While this is a challenge to the existing architecture systems as proposed, there are a variety of ways that this could manifest and we



welcome using a creative solution. The project could use the contrasting natures of glass and masonry to signify different masses or uses, or it could instead apply it as a more delicate textural change (e.g. a solid base that transition gradually to a more ethereal upper building mass).

**PRELIMINARY PROJECT ASSESSMENT EXPIRATION:**

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Conditional Use Authorization, or other entitlement application as listed above, must be submitted no later than **December 27, 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.

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