



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**DATE:** April 28, 2016  
**TO:** Daniel Murphy, UrbanGreen Devco.  
**FROM:** Chris Kern, Planning Department  
**RE:** PPA Case No. 2016-001557 for 184-188 Hooper Street

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

Reception:  
415.558.6378

Fax:  
415.558.6409

Planning  
Information:  
415.558.6377

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Julie Moore, at (415) 575-8733 or [Julie.Moore@sfgov.org](mailto:Julie.Moore@sfgov.org), to answer any questions you may have, or to schedule a follow-up meeting.

A handwritten signature in black ink, appearing to be "Chris Kern", written over a horizontal line.

Chris Kern, Senior Planner



# SAN FRANCISCO PLANNING DEPARTMENT

---

## Preliminary Project Assessment

*Date:* April 28, 2016  
*Case No.:* 2016-001557PPA  
*Project Address:* California College of the Arts, 184-188 Hooper Street  
*Block/Lot:* 3808/004  
*Parcel Size:* 51,554 square feet  
*Zoning:* Production, Distribution & Repair -1-Design (PDR-1-D)  
Art and Design Educational Special Use District  
58-X  
*Area Plan:* Eastern Neighborhoods, Showplace Square/Potrero Hill  
*Project Sponsor:* Daniel Murphy  
(650) 642-0750  
*Staff Contact:* Julie Moore – (415) 575-8733  
[Julie.Moore@sfgov.org](mailto:Julie.Moore@sfgov.org)

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

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

### 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 February 2, 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 subject of this PPA is the California College of the Arts (CCA) proposal to develop student housing on a portion of one of the five lots on three blocks comprising CCA's "campus" located within an area generally defined by 7th, 8th, Irwin, Channel, De Haro, and 15th Streets in the City's Showplace Square

Design District. The project site is 188 Hooper Street, comprised of an approximately 32,500-square-foot (sf) portion<sup>1</sup> of APN 3808/004 that would be used to develop student housing within California College of the Arts (CCA)'s Arts and Design Special Use District (Planning Code Sec. 249.47) adopted in 2012. The project sponsors, CCA and ArtGroup, LLC, propose to demolish three existing buildings on the site<sup>2</sup> used for graduate programs and to construct a five-story, 58-foot-tall, 154,675 gross-square-foot residential mixed-use building with up to 500 beds of housing for CCA students in single- and double-occupancy dormitories; the existing 21,000 sf building on the same lot at 184 Hooper would remain. As currently conceptualized, about 2,225 sf of commercial retail (café), 5,800 sf of lobby / circulation space, and roughly 29,000 sf of institutional space would be located on the building's ground-floor (including mezzanine spaces), along with about 9,500 sf of vehicle and bicycle parking in a garage accessible off Channel Street that would accommodate a stacker system that could provide off-street parking for up to 38 vehicles. A total of 100 class 1 bicycle parking spaces would be available in the garage. Student dormitories would be located on building levels two through five, and would be interspaced with common meeting and study areas, representing about 110,000 sf of building area. A central courtyard would be located at the building's second level and would provide roughly 4,600-sf of outdoor space. The existing at-grade shared courtyard that provides approximately 6,700 sf of open space would remain but would be re-landscaped as part of the proposed project. In addition to the open space referenced above, the applicant is also considering a roughly 1,600-sf accessible open space on the building's top floor as an additional amenity for the student housing.

The project sponsor has also presented preliminary conceptual designs for pedestrian streetscape improvements along approximately 240-linear feet of frontage on the east side of Carolina and 8th Street between Hooper Street to the south and Channel Street to the north. Changes under consideration could entail widened sidewalks (along the project site's frontage), reconfiguration of on-street parking, greening, gateway markers or other distinguishing place-making features, and traffic calming treatments on Hooper Street from its intersection at 8th Street for at least 230 linear feet to where CCA's property abuts an adjacent property planned for a mixed-use PDR and office project (100 Hooper Street). Channel Street's 153 feet of frontage would also be improved to city street standards coordinated with similar Channel Street improvements planned by 100 Hooper Street.

The building would be supported on a 40-foot deep torque or drilled displacement pile foundation system. Construction of the proposed project would require excavation of around 3 feet below ground surface and removal of approximately 3,600 cubic yards of soil to accommodate the building's foundation system. Project construction would take approximately 17 months to complete.

## 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

---

<sup>1</sup> Assessor Parcel 3808/004 has a total area of roughly 51,550 square feet.

<sup>2</sup> Approximately 22,000-gross-square feet of institutional support space would be demolished on the proposed project site in order to accommodate future student housing uses at that location.

Motion 17659 and adopted the Preferred Project for final recommendation to the Board of Supervisors.<sup>3,4</sup> The Eastern Neighborhoods Area Plans and its associated rezoning became effective December 19, 2008.

On June 21, 2013, the Board of Supervisors adopted Ordinance 108-13 amending the Planning Code by adding Section 249.67, and the Zoning Map, Section Map SU08, to establish the Art and Design Educational Special Use District at 1111 Eighth Street (which is one street address of the five CCA parcels covered by the SUD) to facilitate the continued operation of the California College of the Arts, and provide a regulatory scheme for a potential future phased expansion of the campus. The legislation further stipulates that for any potential housing project within the SUD, standards for development, project review, entitlement process, and impact fees of the Urban Mixed Use ("UMU") district would apply.<sup>5</sup>

## 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 proposed project 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 significant impacts peculiar to the proposed project or project site. 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 outcome, the applicable fees are: (a) the CPE determination fee (currently \$14,017) and (b) the CPE certificate fee (currently \$7,779).

---

<sup>3</sup> 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>.

<sup>4</sup> 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>.

<sup>5</sup> See Planning Code Section 843 et seq. for more information.

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.<sup>6</sup> The Planning Department will provide more detail to the project sponsor regarding the EIR process should this level of environmental review be required.

Formal environmental review begins with Planning Department review of the **Environmental Evaluation Application (EEA)** filed by the project sponsor. The EEA can be submitted at the same time as the PPA application or subsequent to issuance of the PPA letter.

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>7</sup>

A detailed and accurate description of the proposed project is essential for adequate environmental review. Please update the EEA project description as necessary to reflect feedback provided in this PPA letter, and include any additional documents requested herein. If you have already filed your EEA, you may provide the requested information and documents as supplements to your application.

---

<sup>6</sup> San Francisco Planning Department, Consultant Pools. Available online at: [http://sf-planning.org/consultant-sponsor-resources#consultant\\_pools](http://sf-planning.org/consultant-sponsor-resources#consultant_pools)

<sup>7</sup> San Francisco Planning Department. *Schedule for Application Fees*. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=513>.

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 was previously evaluated in the Showplace Square Historic Resource Survey and found ineligible for national, state, or local listing. Thus, the proposed project is not subject to review by the Department's Historic Preservation staff; no additional analysis of historic architectural resources is required.
2. **Archeological Resources.** 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 Planning Department's Transportation Impact Analysis Guidelines for Environmental Review,<sup>8</sup> the project would require additional transportation analysis to determine

---

<sup>8</sup> This document is available at: <http://www.sf-planning.org/index.aspx?page=1886>.

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 Technical Memorandum. You may be required to pay additional fees for the Memorandum; please contact Virnaliza Byrd at (415) 575-9025 to arrange payment. Once you pay the fees, please contact Manoj Madhavan at (415) 575-9095 or [manoj.madhavan@sfgov.org](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 memorandum.

Planning staff have reviewed the proposed site plans and recommend that the project sponsor implement Transportation Demand Management measures such as transit passes, shuttle buses, and bicycle-share parking;

5. **Noise.** *Eastern Neighborhoods PEIR Noise Mitigation Measure F-1: Construction Noise* addresses requirements related to the use of pile-driving. The project sponsor has indicated that the project would involve pile driving. Therefore, *Noise Mitigation Measure F-1* would apply to the proposed project if drilled piles are not used. 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 sheetpile 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 the San Francisco Department of Building Inspection (DBI) prior to commencing construction to ensure that maximum feasible noise attenuation will be achieved.

*Eastern Neighborhoods PEIR Noise Mitigation Measure F-5: Siting of Noise-Generating Uses* applies to projects that 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. Additional information will be needed regarding the outdoor events proposed in the open space to evaluate whether this mitigation measure would apply.

6. **Air Quality.** The proposed project's 247 dormitory/dwelling units slightly exceeds the Bay Area Air Quality Management District's (BAAQMD) construction screening level for criteria air pollutants of 240 dwelling units for a mid-rise apartment land use type; however, the project's new square footage of 154,675 sf is below the construction screening level of 277,000 sf for school/college land uses.<sup>9</sup>

<sup>9</sup> BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3. Available online at: <http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines%20May%202011.ashx?la=en>

Should project modifications increase the dwelling unit counts or project excavation exceed the estimated 3,600 cubic feet, an analysis of the project's criteria air pollutant emissions may 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.

In addition, project-related demolition, excavation, grading and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. To reduce construction dust impacts, the proposed project will be required to adhere to the dust control requirements set forth in the Construction Dust Ordinance contained in San Francisco Health Code Article 22B and San Francisco Building Code Section 106.A.3.2.6. The proposed project is also required to prepare a Construction Dust Control Plan for review and approval by DPH.

The project site is 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. Given that the project site is not within an Air Pollutant Exposure Zone, 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. Please provide detailed information related to any proposed stationary sources with the EEA.

7. **Greenhouse Gases.** *The City and County of San Francisco's Strategies to Address Greenhouse Gas Emissions* presents a comprehensive assessment of policies, programs, and ordinances that represents San Francisco's Qualified Greenhouse Gas (GHG) Reduction Strategy. Projects that are consistent with San Francisco's Qualified GHG Reduction Strategy would result in less-than-significant impacts from GHG emissions. In order to facilitate a determination of compliance with San Francisco's Qualified GHG Reduction Strategy, the Planning Department has prepared a Greenhouse Gas Analysis Compliance Checklist.<sup>10</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 applicable ordinance or regulation may be determined to be inconsistent with the Greenhouse Gas Reduction Strategy.
8. **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>11</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,

---

<sup>10</sup> Refer to <http://sf-planning.org/index.aspx?page=1886> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

<sup>11</sup> San Francisco Planning Department. *Interdepartmental Project Review*. Available online at: <http://sf-planning.org/sites/default/files/FileCenter/Documents/523-Project%20Review%20Application%20Interdepartmental%20-%20Fillable.pdf>



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.

9. **Hazardous Materials.** Subsurface contamination resulting from a previous 2,100-gallon oil underground storage tank removed at the site in 2006, a fuel pipeline along 16<sup>th</sup> Street, and historical uses in the project vicinity could be encountered during excavation. Therefore, the project is subject to Article 22A of the Health Code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I 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/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: <https://www.sfdph.org/dph/EH/Fees.asp> under hazardous waste soil testing. Please provide a copy of the submitted Maher Application and Phase I ESA with the EEA.

*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 DBI for requirements related to the demolition of buildings that may contain lead paint.

10. **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 [SFProjectReview@sfgov.org](mailto:SFProjectReview@sfgov.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 [www.sfgov.org/reqs](http://www.sfgov.org/reqs).

11. **Tree Planting and Protection.** The Department of Public Works Code Section 8.02-8.11 requires disclosure and protection of landmark, significant, and street trees located on private and public property. Any such trees must be shown on the site plans with the size of the trunk diameter, tree height, and accurate canopy drip line. Please submit the *Tree Planting and Protection Checklist* with the EEA and ensure that trees are appropriately shown on site plans. Also see the comments below under "Street Trees."
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:

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. **Large Project Authorization** from the Planning Commission is required per Planning Code Section 329 for the new construction of a building greater than 75 feet in height and greater than 25,000 gross square feet.
2. A **Building Permit Application** is required for the demolition of the existing buildings on the subject property.
3. A **Building Permit Application** is required for the proposed new construction on the subject property.

Large Project 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](http://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.

1. 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.
2. **Neighborhood Outreach.** This project is encouraged to undertake additional public outreach in advance of the Planning Commission hearing on the Large Project Authorization. The developer should conduct an outreach meeting, notifying owners and tenants who live within 300' of the project as well as all registered neighborhood organizations for the South of Market neighborhood, after initial design comments have been provided from the Planning Department and prior to the scheduling of the aforementioned Planning Commission hearing. The purpose of this meeting is to keep the community abreast of the project's evolution, presenting the latest design of the project – including the Department's requested changes – to the community in advance of the Commission taking action on the hearing.
3. **Notification of a Project Receiving Environmental Review.** Notice may be required to be sent to occupants of the project site and properties adjacent to the project site, as well as to owners and, to the extent feasible, occupants of properties within 300 feet of the project site at the initiation of the environmental review process. Please be prepared to provide mailing addresses on a CD upon request during the environmental review process.

**PRELIMINARY PROJECT COMMENTS:**

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

1. **Showplace Square/Potrero Area Plan.** The subject property falls within the area covered by the Showplace Square/Potrero Area Plan. 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://generalplan.sfplanning.org/Showplace\\_Square\\_Potrero.htm](http://generalplan.sfplanning.org/Showplace_Square_Potrero.htm)

2. **Art and Design Educational Special Use District.** The project falls within the PDR-1-D Zoning District and within the Art and Design Educational Special Use District (SUD). The Art and Design Educational SUD is intended to facilitate the continued operation of the California College of the Arts campus, while providing an appropriate regulatory scheme for a potential phased expansion of the campus in the future. Per Planning Code Section 249.67, all provisions of the Planning Code currently applicable shall continue to apply, including but not limited to the provisions of the PDR-1-D zoning district except that postsecondary educational institutional uses are exempted from use size limitations and shall be permitted as of right. In addition, for any student housing project within the SUD, the standards for development project review, entitlement process, and impacts fees of the Urban Mixed Use (UMU) district shall apply.
3. **Large Project Authorization.** Planning Code Section 329 outlines the requirements for a Large Project Authorization in Eastern Neighborhoods Mixed Use Zoning Districts. A Large Project Authorization is required of new construction of more than 25,000 gross square feet. All large projects within the UMU Zoning District are subject to review by the Planning Commission in an effort to achieve the objectives and policies of the General Plan, the applicable Design Guidelines and the Planning Code.

Based on a preliminary review of the proposed project, the exceptions that may be triggered by the proposal (and discussed in more detail below) include:

- Residential Usable Open Space.
- Rear Yard Requirement.
- Dwelling Unit Exposure Requirement.

To the extent possible, the project should be designed to minimize deviations from Planning Code requirements.

4. **Definition of Dwelling Unit.** In order to determine the applicability of several provisions of the Code and whether the project requires any additional exceptions through the Large Project Authorization, future submittals should include a diagram and table with a breakdown of the type and number of dwelling units, each unit's square footage, and whether they include individual

kitchen facilities or not. This will assist in the determination of whether the units qualify as group housing, SRO, or an individual dwelling unit, as defined in Planning Code Section ("Section") 102 and 890.88.

5. **Definition of Non-Residential Uses.** Please include a diagram of the gross square footage and a table of all proposed non-residential uses, as defined in Section 102. The submittal should clarify the types of uses that would be included in the 29,000 square feet of "institutional uses". As currently indicated in the PPA application, some of these uses are categorized as PDR/industrial uses, however later submittals appear to indicate these uses to include classroom, seminar, and gallery/flex spaces.
6. **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 enclosed.
7. **Floor Area Ratio (FAR).** Per Section 124, buildings within the PDR-1-D District may reach a Floor Area Ratio of 4.0 to 1. With a lot area of 51,554 square feet, up to 206,216 square feet may be developed on the subject property. The site's total FAR would encompass area associated with the existing building at 184 Hooper (currently measuring 21,000 square feet). The project appears to include a total of 31,225 gross square feet of non-residential uses which, when added to the existing 21,000 square feet at 184 Hooper, would comply with the maximum permitted Floor Area Ratio. Future submittals should include plans depicting the areas included as gross floor area (as defined in Section 102), and provide precise and detailed calculations to ensure compliance with this requirement.
8. **Height.** A 58-foot height limitation applies to the subject property, and the roof height of the property appears to comply with this limitation. Section 260(b) includes allowances for additional height for rooftop features such as mechanical equipment and stair penthouses (up to a maximum of 10 feet) and elevator penthouses (up to a maximum of 16 feet). Future submittals should illustrate where height for the building has been measured, should clarify heights for any individual rooftop features, and should demonstrate compliance with these standards.
9. **Ground-Floor Height.** For properties within the PDR-1-D District, Section 145.5 requires that ground floor non-residential uses have a minimum floor-to-floor height of 17 feet. Similarly, Section 145.1 requires that ground floor non-residential uses in UMU districts have a minimum floor-to-floor height of 17 feet. It appears that some, but not all of the ground-floor heights meet this requirement. Future submittals should be revised to comply with this requirement, and should provide sufficient sections to demonstrate compliance. Although not encouraged by the Department, the project may seek an exception under the Large Project Authorization for Ground-Floor Height.
10. **Street Frontages.** Section 145.1 requires active uses at the ground floor. Frontages that are not residential or PDR must be fenestrated with transparent doorways for no less than 60 percent of the street frontage at the ground level and allow visibility to the inside of the building. The Showplace Square/Potrero Area Plan recommends ground-level facades to be 75% transparent to permit a clear view inwards from the street. Off-street parking at street grade on a development lot must be set back at least 25 feet on the ground floor and at least 15 feet on floors above, from any façade facing a street at least 30 feet in width. When three or more parking spaces are proposed, all parking spaces must be

set back at least 25 feet from the front of the development. No more than one-third of the width or 20 feet, whichever is less, of any given street frontage shall be devoted to parking and loading ingress or egress. The placement of parking and loading entrances should minimize interference with street-fronting active uses and with the movement of pedestrians, cyclists, public transit and autos. Entrances to off-street parking shall be located at least six feet from a lot corner located at the intersection of two public rights-of-way.

The location of the loading entry at the corner of Channel and Eighth and the off-street parking along Channel do not meet the requirements of Section 145.1. Future submittals should include a loading entry that is relocated away from the corner of Channel and Eighth and that sets back the off-street parking, 25 feet from the ground floor and includes active uses at the ground level. Along Hooper Street, ground floor frontage should connect to the shared street and to the Main Building. Future submittals should include detailed and scaled plans to confirm compliance with these standards. The Department would encourage future work on the CCA Main Building to include more openings and entrances onto Hooper to create more permeability and to connect with the shared street and with the new student housing building.

11. **Rear Yard.** Section 134 requires the project to provide a rear yard of at least 25 percent of the lot depth at the lowest story containing a dwelling unit and at each succeeding level or story of the building. Because this project is located on a corner site, one of the street frontages (Hooper, Eighth or Channel Street) must be designated as the front of the property, and the rear yard would then be provided based on that determination. The rear yard requirement in Eastern Neighborhoods Mixed Use Districts may be modified or waived by the Planning Commission; however, the Department would support a project that provides a comparable amount of open space that would be created in a code conforming rear yard, located elsewhere in the development.
12. **Open Space – Residential.** Section 135 requires 80 square feet of open space (private) or 54 square feet of open space (common) for each dwelling unit. The proposal includes roughly 247 dwelling units. Therefore, approximately 13,338 square feet of common open space would be required. Additionally, any such open spaces must meet the dimensional requirements of Subsections (f) and (g). Within the Eastern Neighborhoods Mixed Use district, fifty percent of required open space may be provided off-site. The proposed project does not appear to provide the minimum amount of open space required by the Planning Code. Additionally, the proposed 20-foot-wide interior courtyard does not meet the “Inner Court” minimum dimensions. Therefore, the proposed project requires revision to meet the minimum open space requirement, or you may request and justify an open space modification through the Large Project Authorization process. The Department would recommend providing an equivalent amount of open space. Future submittals should include a table and plans that provide and illustrate the total number of dwelling units and open space areas proposed. If an open space modification is sought, the Project will be subject to fee defined in Section 427 (Payment in Cases of Variance or Exception for Required Open Space).
13. **Open Space – Non-Residential.** Section 135.3 requires this project to provide one square foot of open space for every 250 square feet of retail (and similar) uses. The proposal includes 2,225 square feet of commercial space and roughly 29,000 square feet of institutional space. Therefore, approximately 125