



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: December 20, 2016
TO: Michael Stanton, Stanton Architecture
FROM: Rich Sucre, Planning Department
RE: PPA Case No. 2016-013032PPA
300 5th Street

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

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Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact me, Rich Sucre, at (415) 575-9108 or richard.sucre@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.



Rich Sucre, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: December 20, 2016
Case No.: **2016-013032PPA**
Project Address: 300 5th Street
Block/Lot: 3753/001
Current Zoning: MUR (Mixed-Use Residential) Zoning District
Youth and Family Zone Special Use District
85-X Height and Bulk District
Proposed Zoning: MUG (Mixed-Use General) Zoning District
85-X Height and Bulk District
Current Area Plan: East SoMa Area Plan
Proposed Area Plan: Central SoMa Area Plan
Project Sponsor: Michael Stanton, Stanton Architecture
mstanton@stantonarchitecture.com
415-865-9600
Staff Contact: Ming Yeung – 415-575-9183
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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 October 6, 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 proposal would demolish an existing one-story, approximately 1,600-square-foot (sf) gas station and service center (dba Shell) and would construct an eight-story, 85-foot-tall (95-foot tall with elevator penthouse and roof deck covering), approximately 71,620 sf mixed-use building with commercial/retail, hotel, and residential uses. The project site is a corner parcel fronting Folsom and 5th Streets. The ground level of the new building would include a hotel lobby and bar/breakfast room fronting Folsom Street, back of the house and accessory office space with access from Folsom Street, and a separate residential lobby and approximately 1,280 sf commercial/retail space fronting 5th Street. Approximately 120 hotel rooms would be located on a mezzanine level and floors 2 through 7, and five residential units (one, one-bedroom unit and three, two-bedroom units) would be located on the top (eighth) floor. An approximately 1,925 sf roof-top deck would be provided as common open space. No vehicular parking would be provided. Bike parking would be located on the ground level and additional offices and mechanical and building support areas would be located in a basement level. The project would involve approximately 4,400 sf (2,280 cubic yards) of excavated material to a depth of 14 feet below grade. The application indicates that the type of foundation used would be spread footing or mat slab.

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 2008.¹

The project site also lies within the proposed Central SoMa Plan area, a community planning process initiated in 2011. The Central Corridor Plan Draft for Public Review² (Draft Plan) was released in April 2013, with proposed changes to the allowed land uses and building heights in the Plan area, including a strategy for improving the public realm within the Plan area and vicinity. An updated draft Plan and Implementation Strategy was released August 11, 2016 and is being evaluated in an Environmental Impact Report (EIR) anticipated for draft publication in December 2016. The Draft Plan and its proposed rezoning are anticipated to be before decision-makers for approval in 2017. All relevant materials are available for download at <http://centralsoma.sfplanning.org>. The Central SoMa Plan is being 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 2017.

Comments in this PPA are based on the draft Plan concepts published to date.

ENVIRONMENTAL REVIEW:

The proposed project requires environmental review either individually, with a project-specific Initial Study/Mitigated Negative Declaration or Environmental Impact Report (EIR), or in a Community Plan Exemption (CPE) if the project is consistent with an adopted community plan. Additionally, the proposed

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

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

project is located within the Eastern Neighborhoods Area Plan, which was evaluated in the *Eastern Neighborhoods PEIR*. The proposed project would be consistent with the land use or development density (zoning) identified in the Eastern Neighborhoods Area Plan, and it is therefore eligible for a Community Plan Evaluation (CPE) under the *Eastern Neighborhoods PEIR*.

The project's proposed 85-foot building height would also be consistent with both height limit alternatives currently being studied in the Central SoMa Plan EIR. Thus, it is possible that the proposal, as currently presented, would also qualify for a CPE under the proposed Central SoMa Plan EIR once that EIR is certified and the Planning Commission and Board of Supervisors have adopted new zoning controls. However, the proposed project would be assessed based on the height limits for the project site in place at the time that the Planning Department entitlements for the proposed project are sought.

Due to the project's location within the geographic area evaluated in the *Eastern Neighborhoods PEIR*, any development on the project site would potentially be subject to the mitigation measures identified in that document. Potentially significant project environmental impacts that were identified in and pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods PEIR* that may be applicable to the proposed project are discussed below, under the applicable environmental topic. 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.

Community Plan Evaluation

Section 15183 of the California Environmental Quality Act (CEQA) Guidelines mandates 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, since the proposed project is located within the Eastern Neighborhoods Area Plan which was evaluated in the *Eastern Neighborhoods PEIR*, and the proposed project is consistent with the development density identified in the area plan, 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 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 *PEIR*, and there would be no new "peculiar" significant impacts unique to the proposed project. In these situations, all pertinent mitigation measures and CEQA findings from the *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 \$14,427) and (b) the CPE certificate fee (currently \$8,005).

2. **Mitigated Negative Declaration.** If new site- or project-specific significant impacts are identified for the proposed project that were not identified in the *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 *PEIR*, with all pertinent mitigation measures and CEQA findings from the *PEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$14,427) 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 *PEIR*, with all pertinent mitigation measures and CEQA findings from the *PEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$14,427); (b) the standard environmental evaluation fee (which is based on construction value); and (c) one-half of the standard EIR fee (which is also based on construction value). An EIR must be prepared by an environmental consultant from the Planning Department's environmental consultant pool:

http://www.sfplanning.org/ftp/files/MEA/Environmental_consultant_pool.pdf).

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

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 under the "Publications" tab. See "Environmental Applications" on page 2 of the current Fee Schedule for a calculation of environmental application fees.³

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. Furthermore, please include the following information regarding the proposed project: provide existing and proposed street widths, as indicated below under Item 4, Transportation. If you have already filed your EEA, you may provide the requested information and documents as supplements to your application.

³ 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 Preliminary Project Assessment (PPA) application.

1. **Historic Resource Evaluation (HRE).** The project site is within the boundaries of the Central SoMa Historic Resources Survey; however, it is not within a designated historic district. The existing gas station service center was constructed in 1990 and is not considered a historic resource. The existing building on the project site was previously evaluated in the South of Market 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 Rezoning and Area Plans* PEIR that would require for the proposed project either Preliminary Archeological Review (PAR) conducted in-house by the Planning Department archeologist or, if requested, the preparation of 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 determine the potential for the proposed project to affect archeological deposits. This determination will be based on the archeological sensitivity of the project site based on in-house source material and on potential soils disturbance/modification that may result from the project, such as, excavation, installation of foundations, soils improvement, site remediation, etc. The Department archeologist will need to review any available geotechnical/soils or phase II hazardous materials report prepared for the project. In those instances where the Department archeologist determines that the project has a potential to adversely affect an archeological resource, the PAR will state what additional measures are needed to address the potential effect. These measures may include preparation of an archeological research design and treatment plan, implementation of one of the Planning Department's three standard archeological mitigation measures (archeological testing, monitoring, or accidental discovery), or other appropriate measures.
3. **Tribal Cultural Resources.** Tribal cultural resources (TCRs) are a class of resource established under the California Environmental Quality Act (CEQA) in 2015. TCRs are defined as a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American tribe, that is either included on or eligible for inclusion in the California Register of Historical Resources or a local historic register, or is a resource that the lead agency, at its discretion and supported by substantial evidence, determines is a TCR. Planning Department staff will review the proposed project to determine if it may cause an adverse effect to a TCR; this will occur in tandem with preliminary archeological review. No additional information is needed from the project sponsor at this time. Consultation with California Native American tribes regarding TCRs may be required at the request of the tribes. If staff determines that the proposed project may have a potential significant adverse impact on a TCR, mitigation measures will be identified and required. Mitigation measures may include avoidance, protection, or preservation of the TCR and development of interpretation and public education and artistic programs.

4. **Transportation.** Based on the PPA submittal, a circulation memo would likely be required to support the environmental review; an official determination will be made subsequent to submittal of the EEA. Planning transportation staff have reviewed the proposed site plans and request that existing and proposed sidewalk and curb cut dimension be shown on project plans submitted as part of the EEA, and that existing curb cuts proposed for removal also be shown on plans. The EEA should also indicate where loading is proposed to occur. As part of the circulation memo, coordination with the San Francisco Municipal Transportation Agency and Caltrans would be required.

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 to 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 includes approximately 1,280 sf of commercial/retail uses, 120 hotel rooms and 5 dwelling units, and thus would be subject to the proposed TDM Program. The proposed project, which would not include any accessory parking spaces, would be required to meet or exceed a target of 13 points for land use category B (hotel).

The Planning Code would currently require the project, as described in the PPA, to provide bicycle parking (Planning Code Section 155.2; TDM Menu ACTIVE-2 – option a). The project may also be required to select and incorporate additional TDM measures to meet the target listed above. A full list of the TDM measures included in the menu of options is available on this website: <http://sf-planning.org/shift-encourage-sustainable-travel>. When an environmental planner is assigned, he or she will provide additional guidance regarding the proposed TDM Program and next steps.

5. **Noise.** The proposed project would be subject to Eastern Neighborhoods PEIR Mitigation Measures F-1 and F-2. *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. This mitigation measure requires that contractors use 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 DBI prior to commencing construction to ensure that maximum feasible noise attenuation will be achieved.

- Air Quality.** The proposed project, at approximately 1,280 sf of commercial retail uses, 120 hotel rooms and 5 dwelling units, is below the Bay Area Air Quality Management District's (BAAQMD) construction and operational screening levels for criteria air pollutants.⁴ Therefore, an analysis of the project's criteria air pollutant emissions is not likely to be required. However, please provide detailed information related to construction equipment, phasing and duration of each phase, and the 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 would 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 project site is located within an Air Pollutant Exposure Zone, as mapped and defined by Health Code Article 38. The Air Pollutant Exposure Zone identifies areas with poor air quality based on modeling of air pollution, exposures, and health vulnerability from mobile, stationary, and area source emissions within San Francisco. The project proposes to construct new sensitive land uses (i.e., residential and hotel uses), which are subject to enhanced ventilation measures pursuant to Health Code Article 38. The project sponsor will be required to submit an Article 38 application to DPH prior to the issuance of any environmental determination. Please provide a copy of the initial application with the EEA.⁵ Equipment exhaust measures during construction will likely also be required. Please provide detailed information related to construction equipment, phasing and duration of each phase, and the volume of excavation as part of the EEA.

If the project would generate new sources of toxic air contaminants including, but not limited to, emissions from diesel generators or boilers, or any other stationary sources, the project would result in toxic air contaminants that may affect both on-site and off-site sensitive receptors and additional measures will likely be required to reduce stationary source emissions. Based on the information in the PPA application, the proposed project would likely require a backup diesel generator due to the proposed height, but this will be confirmed at the time of the EEA submittal.

⁴ BAAQMD, CEQA Air Quality Guidelines, May 2011, Chapter 3.

⁵ Refer to <http://www.sfdph.org/dph/eh/Air/default.asp> for more information.

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.⁶ The project sponsor is required to submit the completed table regarding project compliance with the identified regulations and provide project-level details in the discussion column. This information will be reviewed by the environmental planner during the environmental review process to determine if the project would comply with San Francisco's Greenhouse Gas Reduction Strategy. Projects that do not comply with an ordinance or regulation may be determined to be inconsistent with the Greenhouse Gas Reduction Strategy.
8. **Wind.** The proposed project would involve construction of a building 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 Planning coordinator prior to proceeding with the analysis.
9. **Shadow.** The proposed project would result in construction of a building greater than 40 feet in height. A preliminary shadow fan analysis prepared by Planning Department staff indicates that the proposed project would not cast shadows on any San Francisco Recreation and Parks Department properties subject to Section 295 of the Planning Code or any other publicly accessible open spaces. Therefore, it is unlikely that the Planning Department will require a detailed shadow analysis.
10. **Geology.** The project site is located within a Seismic Hazard Zone (a Liquefaction Hazard Zone likely underlain by artificial fill). Any new construction on the site is therefore subject to a mandatory Interdepartmental Project Review. 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 result in ground disturbance greater than 50 cubic yards in a Maher Area, which indicates the potential presence of soil and/or groundwater contamination. Therefore, the project is subject to Article 22A of the Health Code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the 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

⁶ Refer to <http://sf-planning.org/index.aspx?page=1886> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

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.

Eastern Neighborhoods EIR Hazardous Materials Mitigation Measure L-1: Hazardous Building Materials would be applicable to the proposed project. This 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.

If the existing structures on the project site 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. **Recycled Water.** Projects located in San Francisco's designated recycled water use areas are required to install recycled water systems for irrigation, cooling, and/or toilet and urinal flushing in accordance with the Recycled (or Reclaimed) Water Use Ordinance, adopted as Article 22 of the San Francisco Public Works Code. New construction or major alterations with a total cumulative area of 40,000 square feet or more; any new, modified, or existing irrigated areas of 10,000 square feet or more; and all subdivisions are required to comply. To determine if the proposed project is in a designated recycled water use area, and for more information about the recycled water requirements, please visit sfwater.org/index.aspx?page=687.
13. **Flood Notification.** The project site is in a block that has the potential to flood during storms. The SFPUC will review the permit application to comment on the proposed application and the potential for flooding during wet weather. Applicants for building permits for either new construction, change of use or change of occupancy, or for major alterations or enlargements shall contact the SFPUC at the beginning of the process to determine whether the project would result in ground-level flooding during storms. Requirements may include provision of measures to ensure positive sewage flow, raised elevation of entryways, and/or special sidewalk construction and the provision of deep gutters. The side sewer connection permits for such projects need to be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning

Department, DBI, or the Successor Agency to the San Francisco Redevelopment Agency. For information required for the review of projects in flood-prone areas, the permit applicant shall refer to Bulletin No. 4: http://www.sf-planning.org/ftp/files/publications_reports/DB_04_Flood_Zones.pdf.

14. **Stormwater.** Because the proposed project would result in a ground surface disturbance of 5,000 square feet or more, it is subject to San Francisco's stormwater management requirements as outlined in the Stormwater Management Ordinance and the corresponding SFPUC Stormwater Design Guidelines (Guidelines). Projects that trigger the stormwater management requirements must prepare a Stormwater Control Plan demonstrating project adherence to the performance measures outlined in the Guidelines, including: (a) reduction in *total volume* and *peak flow rate* of stormwater for areas in combined sewer systems OR (b) *stormwater treatment* for areas in separate sewer systems. Responsibility for review and approval of the Stormwater Control Plan is with the SFPUC, Wastewater Enterprise, Urban Watershed Management Program. Without SFPUC approval of a Stormwater Control Plan, no site or building permits can be issued. The Guidelines also require a signed maintenance agreement to ensure proper care of the necessary stormwater controls. The project's environmental evaluation should generally assess how and where the implementation of necessary stormwater controls would reduce the potential negative impacts of stormwater runoff. To view the Stormwater Management Ordinance or the Stormwater Design Guidelines, or to download instructions for the Stormwater Control Plan, go to <http://sfwater.org/sdg>. Applicants may contact stormwaterreview@sfwater.org for assistance.
15. **Disclosure Report for Developers of Major City Projects.** The San Francisco Ethics Commission S.F. Camp. & Govt. Conduct Code § 3.520 et seq. requires developers to provide the public with information about donations that developers make to nonprofit organizations that may communicate with the City and County regarding major development projects. This report must be completed and filed by the developer of any "major project." A major project is a real estate development project located in the City and County of San Francisco with estimated construction costs exceeding \$1,000,000 where either: (1) The Planning Commission or any other local lead agency certifies an EIR for the project; or (2) The project relies on a program EIR and the Planning Department, Planning Commission, or any other local lead agency adopts any final environmental determination under CEQA. A final environmental determination includes: the issuance of a CPE; certification of an EIR; adoption of a Final Mitigated Negative Declaration; or a project approval by the Planning Commission that adopts CEQA Findings. 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. **Rezoning.** The project site is located within the Mixed-Use Residential (MUR) District. The proposed primary tourist hotel use is not permitted under this zoning, though the accessory residential and retail uses are permitted. In order for the project to proceed, the Planning Commission and Board of Supervisors would need to approve new zoning controls for the subject parcel.

The zoning concepts included in the Central SoMa Draft Plan indicate that a reclassification to Mixed Use General (MUG) Zoning District is being considered for the site. If the project site is rezoned as proposed in the draft *Central SoMa Plan*, a **Conditional Use Authorization** would be required per Section 840.51 to permit the tourist hotel in the MUG Zoning District. Please see further discussion in the Preliminary Project Comments section.

2. A **Large Project Authorization** from the Planning Commission is required per Planning Code Section 329 for the new construction of a building greater than 75 feet in height and greater than 25,000 gross square feet.
3. A **Conditional Use Authorization** from the Planning Commission may be required per Planning Code Section 202.5 for the conversion of an automotive service station.
4. A **Building Permit Application** is required for the demolition of the existing building on the subject property.
5. A **Building Permit Application** is required for the proposed new construction on the subject property.

All applications are available in the Planning Department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at www.sfplanning.org. Building Permit applications are available at the Department of Building 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 under the "Permits & Zoning" tab. All registered neighborhood group mailing lists are available online at www.sfplanning.org under the "Resource Center" tab.

2. **Neighborhood Outreach.** This project is required to undertake additional public outreach in advance of the Planning Commission hearing on the Large Project Authorization. The developer is required to conduct an additional 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. **Existing Zoning.** The subject property is zoned in the Mixed Use Residential (MUR) district, which does not permit the proposed primary tourist hotel use. The project could not be approved under existing zoning. It is located within the 85-X height and bulk district, which does permit the project's proposed height and bulk.
2. **Central SoMa Plan.** The subject property falls within the Central SoMa Plan area, generally bounded by 2nd, 6th, and Townsend, with an articulated northern boundary of Stevenson Street on the western edge and Folsom Street on the eastern edge. An updated draft Plan and Implementation Strategy was released August 11, 2016 and is being evaluated in an Environmental Impact Report (EIR) anticipated for draft publication in December 2016. The draft Plan proposes changes to the allowed land uses, building heights, and bulk controls, and includes strategies for improving all streets and sidewalks, as well as the neighborhood's sustainability performance. The EIR, the draft Plan, and the proposed rezoning and affiliated Code changes are anticipated to be before decisions-makers for approval by mid-2017. All relevant materials are available for download at <http://centralsoma.sfplanning.org>.

Further comments in this section of the PPA are based on the Central SoMa Draft Plan and refinements posted to the website as of the drafting of the Plan.

3. **Land Use-Hotel.** The Central SoMa Draft Plan recommends rezoning the subject property to the Mixed-Use General (MUG) zoning district, in which the proposed hotel use would be allowed, subject to a Conditional Use Authorization from the Planning Commission. A hotel use is defined as a non-residential use. Additional findings for hotel use would be required per Planning Code Section 303, including a market demand study. The hotel use is generally consistent with key objectives of the Central SoMa Plan, which include providing support for substantial development in a transit-rich

area and favoring office development over other kinds of growth. In order to create a diverse and dynamic 24-hour neighborhood characteristic of SoMa, the Central SoMa Plan envisions a mixed-use neighborhood in which substantial office development is balanced with retail, arts, entertainment, industrial, and residential uses. The proposed 1,280 gross square feet of ground floor retail use as well as the hotel restaurant and bar on the northern corner of the building support this vision of a mixed-use neighborhood; the project sponsor is encouraged to further explore inclusion of a variety of uses for these ground floor spaces.

4. **Urban Form: Height and Bulk.** Under both current and proposed zoning, the height limit of the subject parcel is 85 feet, under which the proposed project would be allowed.
5. **Floor Area Ratio.** Planning Code Section 124 permits a floor area ratio of 6 to 1 for development in an MUG or MUR Zoning district within an 85-foot height district. With a lot area size of 8,625 square feet, this would permit 51,750 square feet of non-residential uses. In future submittals please provide a table with gross square feet totals for each use type to ensure consistency with this Code provision. Gross square footage is defined in Planning Code Section 102 (See Floor Area, Gross).
6. **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 MUR/MUG 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:

- Rear Yard (Planning Code Section 134).
- Exposure (Planning Code Section 140).

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

7. **Proposition X/PDR Replacement.** On November 8, 2016, San Francisco voters passed Proposition X which requires replacement space and conditional use authorization for the conversion of PDR use, institutional community use and arts activities use. The proposition applies to conversion of building space where the prior use in such space was a PDR use of at least 5,000 square feet. Your application indicates that the existing PDR use at the site is approximately 1,600 square feet; therefore, the replacement requirement of Proposition X would not apply to this project.
8. **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

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 are interested in working with development and design teams to help achieve the Area Plan's sustainability goals. Department staff are 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:

San Francisco Eco-District Program:
<http://www.sf-planning.org/index.aspx?page=3051>

Central SoMa Eco-District Task Force Recommendations Report (2013):
http://www.sf-planning.org/ftp/files/plans-and-programs/emerging_issues/sustainable-development/CentralSoMa_EcoDTaskForceReport_112513.pdf

Living Roofs Program:
<http://www.sf-planning.org/index.aspx?page=3839>.

9. **Interdepartmental Project Review.** This review is required for all proposed new construction in seismic hazard zones, in which the subject property falls. An application can be found here: http://forms.sfplanning.org/ProjectReview_ApplicationInterdepartmental.pdf.
10. **Rear Yard.** Planning Code Section 134 requires the project to provide a rear yard of at least 25 percent of the lot depth of the lowest story containing a dwelling unit. Because this project is located on a corner site, one of the street frontages (5th Street or Folsom Street) must be designated as the front of the property, and the rear yard would then be provided based on that determination. Currently, the project does not provide a code-complying rear yard. Therefore, the project requires an exception from the rear yard requirements under a Large Project Authorization. If the project chooses to seek an exception for rear yard, please ensure that the project provides Code-complying open space equivalent to and/or exceeding the amount of open space that would have been provided through a Code-complying rear yard.
11. **Dwelling Unit Exposure.** Planning Code Section 140 requires that each dwelling unit have at least one room that meets the 120-square-foot minimum superficial floor area requirement of Section 503 of the Housing Code face directly on a street right-of-way, code-complying rear yard, or an

appropriately sized courtyard. The proposed rear yard is not Code-complying and does not provide a large enough courtyard to meet the exposure requirement for the 2 BR/1 BA unit that has windows fronting the rear yard area. Therefore, the project requires an exposure exception through the Large Project Authorization process.

12. **Permitted Obstructions (Bay Windows).** Planning Code Section 136 allows bay windows to extend over the public right-of-way, provided that these bay windows meet certain standards for dimensions and minimum separation. Future submittals should indicate the dimensions of the bay windows to ensure compliance with these requirements.
13. **Height Exemptions.** Planning Code Section 260(b) establishes permitted height exceptions for roof-top elements and specifies that the totality of such elements shall not exceed 20 percent of the roof's surface area. Future plans should call out the exceptions sought and the total surface area of roof-top features to demonstrate compliance with this code section. In particular, the proposed rooftop deck overhang feature may not be permitted under the height exemption requirements.
14. **Open Space – Residential.** Planning Code Section 135 requires 80 square feet of open space for each dwelling unit (400 sf) or 54 square feet of open space for each dwelling unit (270 sf) if publicly accessible. The project proposes an approximately 1,925 sf rooftop deck which would satisfy this requirement.
15. **Open Space – Non-Residential.** Planning Code Section 135.3 requires the project to provide one square foot of usable open space per every 250 square feet of occupied floor area of retail use proposed. Based on the estimated area for hotel and ground-floor retail use included in the PPA application (1,280 sf retail and 61,083 sf of hotel/offices), the proposed project would be required to provide approximately 249 square feet of non-residential open space.

The Central Corridor Draft Plan proposes a requirement that commercial developments include a minimum amount of Privately-Owned Public Open Space (POPOS), similar to those required in the C-3 Zoning District under Section 138. Provision of this space would be in lieu of meeting the current requirements of Section 135.3. See below for more information.

16. **Open Space/Privately-Owned Public Open Space (POPOS).** The Central Corridor Draft Plan proposes a requirement that office and hotel developments greater than 25,000 GSF include a minimum amount of Privately Owned Public Open Space (POPOS), similar to those required in the C-3 district under Section 138. If these requirements are adopted as part of the Plan, such spaces would need to meet specified provisions on accessibility, design quality, and operations and maintenance. For more information, please see the Central SoMa policy paper on POPOS, found here:

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

http://default.sfplanning.org/Citywide/Central_Corridor/Draft_CentralSoMa_POPOS_Policy-November2014.pdf

The Draft Plan would require the project to provide one square foot of open space for every 50 occupied square feet of office or hotel use. POPOS must be located outdoors at street level, except for projects where the POPOS requirement exceeds 15% of the lot area, which are allowed to satisfy the requirement in multiple ways.

Given the Project's 61,083 gsf of hotel use, the proposed POPOS requirement would equal 1,222 sf, which is 14% of the lot area (8,625 sq ft). Thus, the project would be required to provide the POPOS at ground level, and the proposed project is inconsistent with this requirement.

17. **Street Frontages in Mixed Use Districts.** Planning Code Section 145.1 requires that frontages with active uses that are not residential or PDR must be fenestrated with transparent windows and 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 use of dark or mirrored glass shall not count towards the required transparent area. Please ensure that the ground floor street frontage meets all of these requirements to use, ground-floor ceiling height, transparency, fenestration, gates, railings and grillwork.
18. **Bicycle Parking.** Planning Code Section 155.2 outlines the bicycle parking requirements for the proposed retail, hotel and residential uses. The proposed project is required to provide 9 Class 1 bicycle parking spaces and 6 Class 2 spaces. Additional bicycle parking spaces may be required if the proposed hotel use includes conference, meeting or function rooms. Future plans for the project shall clearly demonstrate that the bicycle parking area meets the requirements in the Zoning Administrator's Bulletin No. 9 Bicycle Parking Requirements: Design & Layout.
19. **Standards for Bird Safe Buildings.** Please note that the proposal will be subject to Planning Code Section 139, Standards for Bird Safe Buildings. Please note the Feature Related requirements, under subsection (c)(2).
20. **Vision Zero.** In 2014, the City adopted the 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 City has determined that streets on the Vision Zero network should be prioritized for safety improvements especially those that improve the safety of vulnerable users like people walking and people on bikes.

This project is located on a vehicular (Folsom Street) and bike (5th Street) high-injury corridor, and is encouraged to incorporate safety measures into the project.

21. **Shadow Analysis (Section 147 and 295).** Planning Code Section 147 requires that new buildings and additions to existing buildings in C-3, South of Market Mixed Use, and Eastern Neighborhoods Mixed Use Districts that exceed 50 feet shall be shaped to reduce substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Section 295. A preliminary shadow study was conducted by Staff in conjunction with this PPA Application, and it indicated that the project will not cast a shadow on any park or open space protected under Planning Code Section 295. No further shadow studies are required.

22. **SoMa Youth and Family SUD and Affordable Housing.** The project site falls within the SoMa Youth and Family Special Use District (SUD). As such, it is subject to the criteria of Section 249.40A. The SUD requires a conditional use authorization for a variety of uses. It also requires certain projects to provide a larger amount of affordable housing. The subject property currently does not fall on a site that triggers this requirement (see Subsection (c)(2)).
23. **Filipino Cultural Heritage District.** The project site falls within the Filipino Cultural Heritage District. The SoMa Pilipinas community collaborates with various City departments, including the Planning Department, to develop a strategy and implementation plan to preserve and further develop the SoMa Pilipinas as the regional center of Filipino culture and commerce, to recognize the historical and present contributions of the community and neighborhood, and to stabilize Filipino residents, business and community-serving institutions. The project applicant is encouraged to reach out to the SoMa Pilipinas community to discuss the project and possible opportunities to incorporate the mission of the Heritage District into the project.
24. **SFPUC Project Review.** The SFPUC has a separate project review process for projects that propose to use land owned by the SFPUC or 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 the above criteria, please contact SFProjectReview@sfgwater.org for a SFPUC Project Review and Land Use Application. For more information regarding the SFPUC's water, sewer, and stormwater requirements, please visit the For Developers webpage at:
<http://www.sfgwater.org/index.aspx?page=574>
25. **Noise Regulations Relating to Residential Uses Near Places of Entertainment (POE):** New residential development within 300 feet of a Place of Entertainment must go through an Entertainment Commission outreach process (Ordinance Number 070-015). In addition, new residential development will also be required to record a Notice of Special Restrictions (NSR) on the site. The subject site is located within 300 feet of an existing POE (see enclosed map). Please note that the Planning Department will not consider an entitlement application complete until the following are completed:
- (A) The Entertainment Commission has provided written notification to the Planning Department indicating that it either did not wish to hold a hearing, or that it held a hearing and the Project Sponsor attended; and
 - (B) The Project Sponsor has included a copy of any comments and/or recommendations provided by the Entertainment Commission regarding the proposed Project as well as the date(s) when those comments were provided. This shall be done as an additional sheet in any plan set submitted to the Planning Department and as an attachment in an entitlement application.

You may contact Entertainment Commission staff at (415) 554-6678 or visit their webpage at <http://www.sfgov2.org/index.aspx?page=338> for additional information regarding the outreach process.

26. **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. For more information, please see the Central SoMa Draft Plan and Implementation Strategy entitled “Part IIB – Central SoMa Public Benefits Package,” available online at:
<http://default.sfplanning.org/Citywide/Central Corridor/Central SoMa Plan Part02B-Public Benefits Package FINAL.pdf>.
27. **Child Care Requirement.** The Project is subject to the Child Care requirement of Planning Code Section 414, for office and hotel uses. The project sponsor has the choice of six options to fulfill this requirement, including payment of an in-lieu fee.
28. **Impact Fees.** This project will be subject to various impact fees. Please refer to the Planning Director’s Bulletin No. 1 for an overview of Development Impact Fees, and to the Department of Building Inspection’s Development Impact Fee webpage for more information about current rates.

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

- a. Transportation Sustainability Fee (§411A)
 - b. Child-Care In-Lieu Fee (if elected) and Residential Child Care Impact Fee (§414 and 414A)
 - c. Eastern Neighborhoods Impact Fee (§423)
 - d. Public Art (§429)
29. **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 412.3(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.
30. **First Source Hiring Agreement.** A First Source Hiring Agreement is required for any project proposing to construct 25,000 gross square feet or more. For more information, please contact:

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

PRELIMINARY DESIGN COMMENTS:

The project is located in a MUR – Mixed Use-Residential Zoning District, SOMA Youth and Family Zone Special Use District and Central SoMa, East SoMa (EN), and South of Market planning areas. Please review the Central SoMa Plan website including the *Implementation Matrix* and *Guide to Urban Design* as they further explain not only the privately-owned public open space (POPOS) requirements and bulk

controls, but neighborhood character goals. The following comments address preliminary design issues that may substantially affect the proposed project:

Site Design, Open Space, and Massing. The Planning Department requests the POPOS requirement be incorporated in the next design iteration as per the Central Soma Plan Objective 5.5. As POPOS is required at grade and open to the sky, this could be integrated with a connection to the breakfast nook or another public space on the ground floor. Consider the POPOS as a significant piece in the identity of the project and contribution to the neighborhood.

Architecture. The Central SoMa Plan asks for building architecture to be innovative and compatible with the existing neighborhood under Objective 8.6 in the implementation matrix. The current proposal offers a more conventional architectural response without noting the distinguishing characteristics in the south of Market area. The nearby architecture tends to reflect either more finely-grained, human-scaled, residential qualities or more open, masonry, frame and infill historic industrial character. Please review the *Guide to Urban Design*, specifically "Part 1: Additional Architectural Guidance." The Department encourages a more robust design concept and supports highlighting a corner expression as this marks the intersection of two major streets.

At this point the architecture is assumed to be preliminary and the Department will provide further detailed design review on the subsequent submission. The Department recommends that the project express significant façade depth, provide high-quality materials, and meet the architectural detailing and character of the neighborhood.

PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Conditional Use Authorization, Large Project Authorization or Building Permit Application, as listed above, must be submitted no later than **June 20, 2018**. Otherwise, this determination is considered expired and a new Preliminary Project Assessment is required. Such applications and plans must be generally consistent with those found in this Preliminary Project Assessment.

Enclosure: Neighborhood Group Mailing List
Preliminary Shadow Fan
Places of Entertainment Map

cc: Michael Stanton, Stanton Architecture, Project Applicant
Ming Yeung, Current Planning
Tania Sheyner, Environmental Planning
Lisa Chen, Citywide Planning and Analysis
Maia Small, Design Review
Jonas Ionin, Planning Commission Secretary
Charles Rivasplata, SFMTA
Jerry Sanguinetti, Public Works
Pauline Perkins, SFPUC
June Weintraub and Jonathan Piakis, DPH (send to DPH only if project is in Air Pollutant Exposure Zone)
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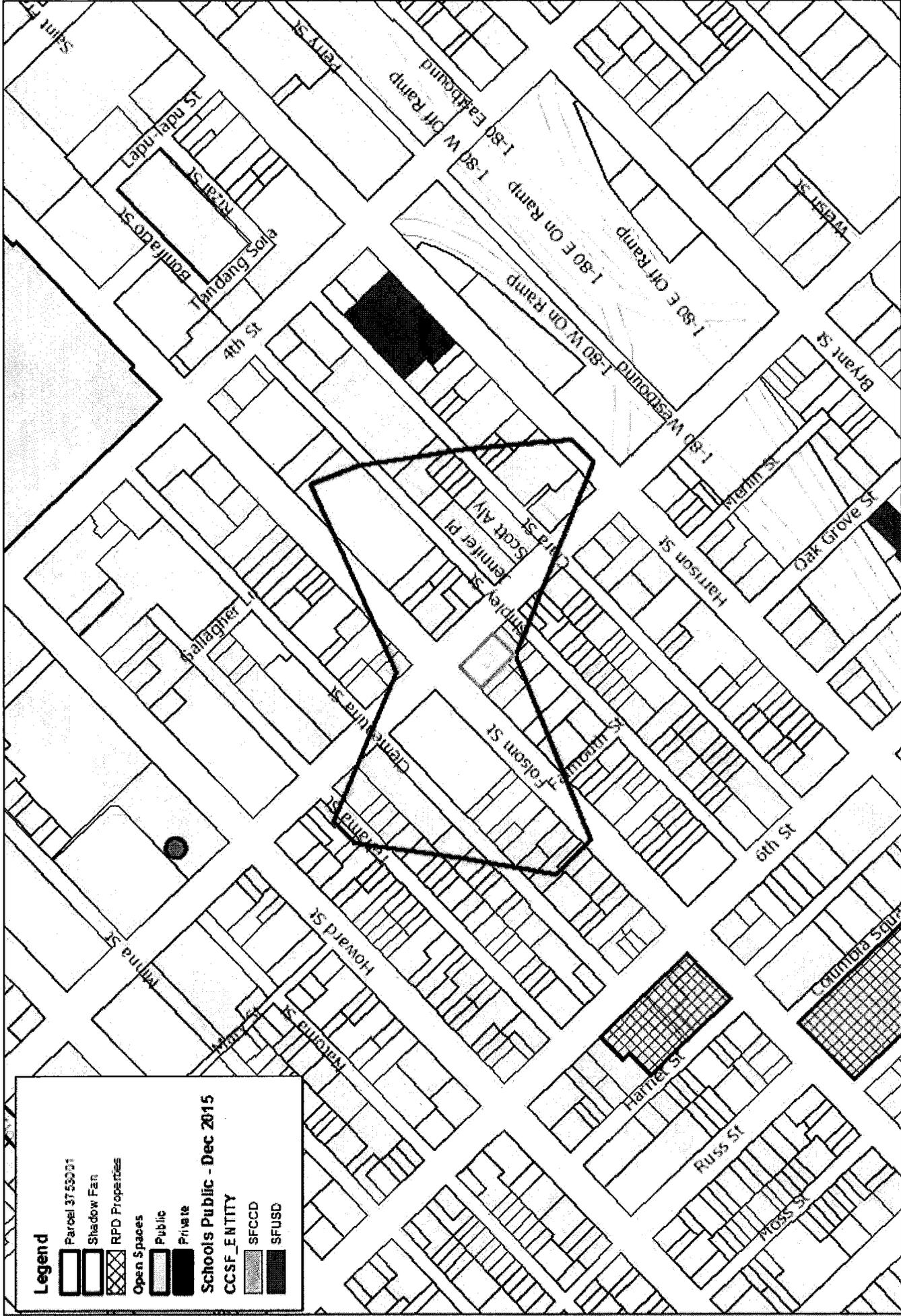
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Legend

-  Parcel 3753001
-  Shadow Fan
-  RPD Properties
-  Open Spaces
-  Public
-  Private
- Schools Public - Dec 2015**
-  CCSF_ENTITY
-  SFCSD
-  SFUSD

Title: 300 5th Street - Shadow Fan

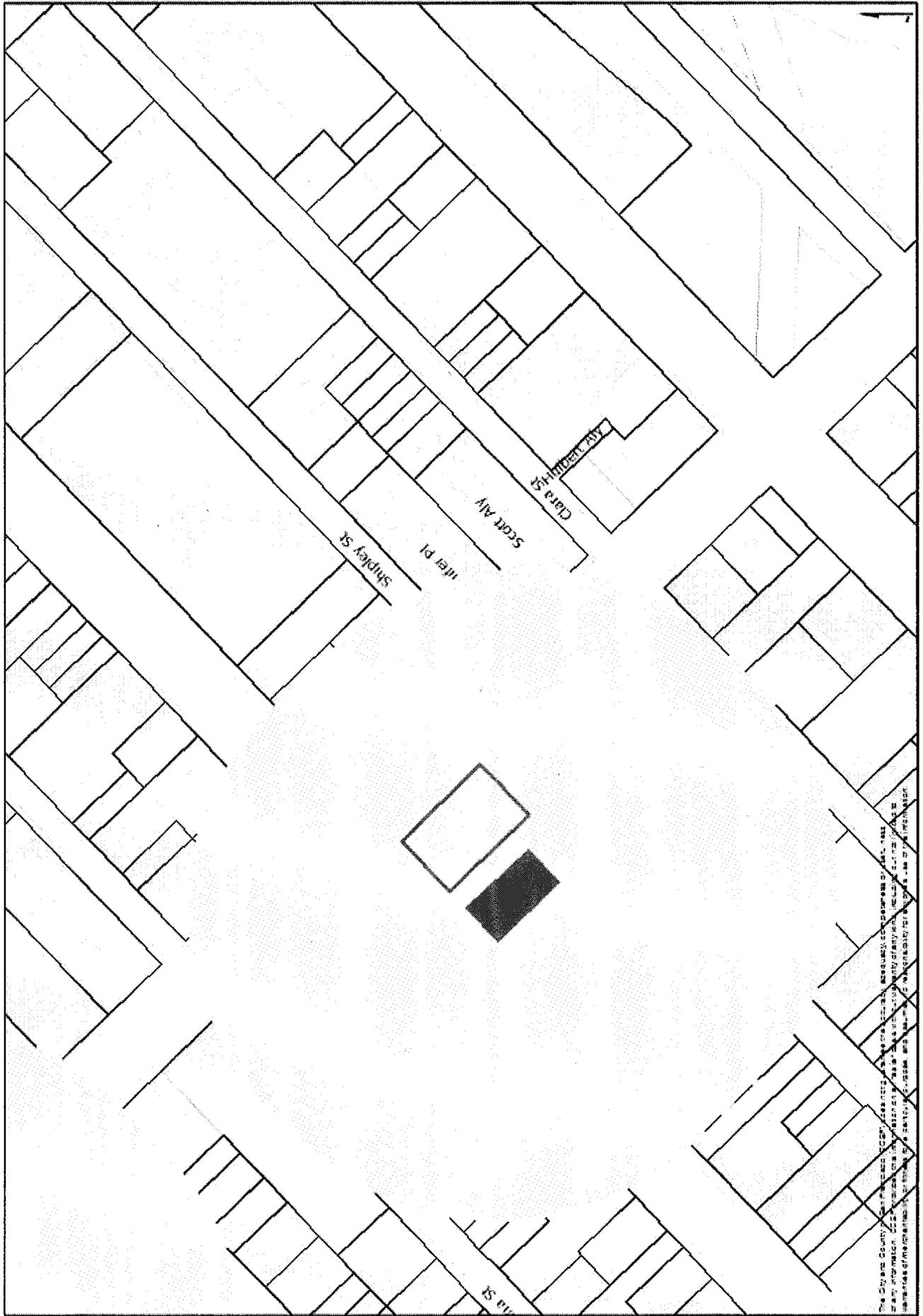
Comments: Assuming 85-foot-tall building

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300 5th Street - Places of Entertainment



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