Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Michael Li, at (415) 575-9107 or michael.j.li@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

Joy Navarrete, Senior Planner
Preliminary Project Assessment

Date: January 9, 2017
Case No.: 2016-013184PPA
Project Address: 973 Mission Street
Block/Lot: 3725/078
Zoning: C-3-S (Downtown Support) Zoning District
Area Plan: Downtown
Project Sponsor: Dan WethererII
Staff Contact: Michael Li
(415) 575-9107, michael.j.li@sfgov.org

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 11, 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 project site, which is in San Francisco’s South of Market neighborhood, is a through lot with frontages on Mission and Minna streets. The project site is occupied by a one-story, 19-foot-tall commercial building that is currently vacant. The building was previously occupied by Covo (a co-working space/coffee shop/tap room).
The proposed project consists of interior and exterior tenant improvements to the existing building and a change of use from a co-working space/coffee shop/tap room to a school. Tenant improvements to the Mission Street façade would include the reconfiguration of the building entrance and the installation of a new door and new windows. Tenant improvements to the Minna Street façade would include the replacement of existing and installation of new windows. Interior tenant improvements on the basement, ground floor, and mezzanine levels would include the demolition of existing restrooms and stairs and the construction of new classrooms, an assembly space, offices, restrooms, stairs, and skylights. The proposed project would decrease the floor area of the existing building by about 1,086 square feet (sf), from 17,386 sf to 16,300 sf. Construction of the proposed project would not require any excavation or soils disturbance.

Proof School is a nonprofit private school. At the project site, there would be a maximum of 120 students and 26 employees/staff members. As discussed below, some of the students live outside of San Francisco and would commute via Caltrain.

In the morning, there would be a 30-minute window, from 9:00 a.m. until 9:30 a.m., for student drop-off. Students who ride Caltrain would be picked up at the Caltrain station (4th and King streets) and driven to the project site as part of a carpool system. With each vehicle delivering up to four students, it is anticipated that there would be no more than 15 vehicles arriving at the project site during the morning window.

In the afternoon, there would be a 45-minute window, from 3:45 p.m. until 4:30 p.m., for student pick-up. Nearly all of the students would depart on foot or ride public transportation to their destinations. Some students would be picked up at the project site, but it is anticipated that there would be no more than 10 vehicles arriving at the project site during the afternoon window.

An approximately 44-foot-long passenger loading zone (white curb) would be provided on Mission Street in front of the project site, subject to approval by the Municipal Transportation Agency. No off-street parking is proposed. Bicycle parking is required (four Class 1 spaces for every classroom plus two Class 2 spaces for every classroom) but is not shown on the plans submitted with the PPA application (see “Preliminary Project Comments” below).

ENVIRONMENTAL REVIEW:

In compliance with the California Environmental Quality Act (CEQA), the environmental review process must be completed before any project approval may be granted. This review may be done in conjunction with the required approvals listed below. In order to begin formal environmental review, please submit an Environmental Evaluation Application (EEA) for the full scope of the project. 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 calculation of environmental application fees.1

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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.

If the additional analysis outlined below indicates that the project would not have a significant effect on the environment, the project could be eligible for a Class 32 infill development categorical exemption under CEQA Guidelines Section 15332. If a Class 32 exemption is appropriate, Environmental Planning staff will prepare a certificate of exemption.

If it is determined that the project could result in a significant impact, an initial study would be prepared. The initial study may be prepared either by an environmental consultant from the Planning Department’s environmental consultant pool or by Planning Department staff. Should you choose to have the initial study prepared by an environmental consultant, contact Jessica Range at (415) 575-9018 for a list of three eligible consultants. If the initial study finds that the project would have a significant impact that could be reduced to a less-than-significant level by mitigation measures agreed to by the project sponsor, then the Planning Department would issue a preliminary mitigated negative declaration (PMND). The PMND would be circulated for public review, during which time concerned parties may comment on and/or appeal the determination. If no appeal is filed, the Planning Department would issue a final mitigated negative declaration. Additional information regarding the environmental review process can be found at: http://www.sf-planning.org/modules/showdocument.aspx?documentid=8631.

If the initial study indicates that the project would result in a significant impact that cannot be mitigated to a less-than-significant level, an EIR will be required. An EIR must be prepared by an environmental consultant from the Planning Department’s environmental consultant pool (http://www.sfplanning.org/ftp/files/MEA/Environmental_consultant_pool.pdf). The Planning Department will provide more detail to the project sponsor regarding the EIR process should this level of environmental review be required.

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 South of Market Historical Resources Survey and found ineligible for national, state, or local listing. Thus, the proposed project is not subject to review by the Planning Department’s historic preservation staff; no additional analysis of historic architectural resources is required.

2. **Archeological Resources.** The PPA application indicates that implementation of the proposed project would not require any soils disturbance or excavation. The EEA should verify if this information is correct. If no soils disturbance or excavation would occur, then no analysis of environmental impacts on archeological resources would be required.

3. **Tribal Cultural Resources.** As discussed above, if implementation of the proposed project would not require soils disturbance or excavation, then no analysis of environmental impacts on tribal cultural resources would be required.
4. **Transportation.** Based on the Planning Department’s Transportation Impact Analysis Guidelines for Environmental Review, the project would require additional transportation analysis to determine whether the project may result in a significant impact. Therefore, the Planning Department requires that a consultant listed in the Planning Department’s Transportation Consultant Pool prepare a Transportation Technical Memorandum. You may be required to pay additional fees for the Memorandum; please contact Vimaliza Byrd at (415) 575-9025 to arrange payment. Once you pay the fees, please contact Manoj Madhavan at (415) 575-9095 or manoj.madhavan@sfgov.org so that he can provide you with a list of three consultants from the pre-qualified Transportation Consultant Pool. Upon selection of a transportation consultant, the Planning Department will assign a transportation planner who will direct the scope of the consultant-prepared memorandum.

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

- Provide a streetscape plan.
- Consider safety improvements as part of the streetscape plan.
- Show the location(s) and number of bicycle parking spaces on the plans.
- Show the location and dimensions of the passenger loading zone on the proposed site plan.
- Coordinate with the Municipal Transportation Agency and the Planning Department on proposed improvements related to Muni Forward, the 6th Street Bicycle Plan, the Central SoMa Plan, and the Flower Mart project.

**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 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

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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 consists of a change of use from a co-working space/coffee shop/tap room to a school of less than 25,000 sf and thus would not be subject to the proposed TDM Program.

5. **Noise.** Construction noise would be subject to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code), which includes restrictions on noise levels of construction equipment and hours of construction. If pile driving is to be used during the construction, measures to reduce construction noise may be required as part of the proposed project. The EEA application should indicate whether pile driving or other particularly noisy construction methods are required.

If the proposed project includes any mechanical equipment (e.g., backup diesel generator, HVAC equipment) that would generate noise, the operation of such equipment would be subject to the San Francisco Noise Ordinance.

6. **Air Quality.** The proposed project (a school with 16,300 sf and up to 120 students) is below the Bay Area Air Quality Management District’s construction and operational screening levels for criteria air pollutants. 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 volume of excavation as part of the EEA.

Project-related demolition, excavation, grading and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. To reduce construction dust impacts, the proposed project will be required to adhere to the dust control requirements set forth in the Construction Dust Ordinance contained in San Francisco Health Code Article 22B and San Francisco Building Code Section 106.A.3.2.6.

The project site is located within an Air Pollutant Exposure Zone (APEZ), as mapped and defined by Health Code Article 38. The APEZ 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 a new sensitive land use (school), which is subject to enhanced ventilation measures pursuant to Health Code Article 38. The project sponsor will be required to submit an Article 38 application to the DPH prior to the issuance of any environmental determination. Please provide a copy of the initial Article 38 application with the EEA.

Construction of the proposed project is not anticipated to require the use of diesel-powered equipment or vehicles. The EEA should verify if this information is correct. In the event that diesel-

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4 BAAQMD, CEQA Air Quality Guidelines, May 2011, Chapter 3.
5 Refer to [http://www.sfdph.org/dph/eh/Air/default.asp](http://www.sfdph.org/dph/eh/Air/default.asp) for more information.
powered equipment or vehicles are necessary during the construction period, a mitigation measure to minimize exhaust emissions could be required.

If the project would generate new sources of toxic air contaminants including, but not limited to: diesel generators or boilers, or any other stationary sources, the project would result in toxic air contaminants that may affect both on-site and off-site sensitive receptors. 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. The project sponsor may be 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. **Geology.** The PPA application indicates that implementation of the proposed project would not require any soils disturbance or excavation. The EEA should verify if this information is correct. If no soils disturbance or excavation would occur, then no geotechnical information would be required with the submittal of the EEA, and no analysis of environmental impacts related to geology would be required.

9. **Hazardous Materials.** 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 the BAAQMD for the requirements related to the renovation of buildings that may include 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 renovation of buildings that may contain lead paint.

10. **Disclosure Report for Developers of Major 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

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Preliminary Project Assessment

Case No. 2016-013184PPA
973 Mission Street

$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. A Building Permit Application is required for the change of use to an Institutional School use.

2. A Variance may be required for active frontages and/or for bicycle parking if the project does not meet the stated Code requirements, as discussed below.

Variance applications are available in the Planning Department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at www.sfplanning.org. Building Permit applications are available at the Department of Building Inspection at 1660 Mission Street.

NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

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

1. 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. **Active Frontages.** Section 145.1 requires space for active uses within the first 25 feet of building depth on the ground floor. As proposed, the project would not meet the requirement since there is a proposed wall located approximately 15 feet into the space, which separates the lobby and reception from the remainder of the classroom space. Additionally, while building lobbies and reception areas may be considered active uses so long as they do not exceed the 40 feet or 25 percent of building frontage, whichever is greater, an accessory area for the storage of goods, such as the area labeled “Student Cubbies,” would not qualify as an active use. The interior layout would need to be reconfigured to comply with this requirement, or a variance would need to be sought and justified.

2. **Loading Space.** Section 152.1 requires an off-street freight loading space for a School use within the C-3 District only when the use size exceeds 100,000 square feet. Therefore, no off-street freight loading space is required for this project. The PPA application indicates that an approximately 44-foot-long passenger loading zone (white curb) would be provided on Mission Street in front of the project site, subject to approval by the Municipal Transportation Agency, to accommodate student drop-off and pick-up.

3. **Bicycle Parking.** Planning Code Section 155.2 requires bicycle parking to be provided for any change of occupancy or increase in intensity of use which would increase the number of total required bicycle parking spaces by 15 percent. The previous Retail Sales and Service use would require one Class 1 space for every 7,500 square feet and one Class 2 space for every 2,500 square feet of occupied floor area, or 9 total spaces. Schools require four Class 1 spaces and one Class 2 space for every classroom. With 9 classrooms, this is a total requirement of 45 spaces, which is more than a 15 percent increase; therefore this project must provide at least thirty-six (36) Class 1 and nine (9) Class 2 bicycle parking spaces. The proposed project contains no bicycle parking and would need to seek and justify a variance if bicycle parking cannot be provided. If the full bicycle parking requirement cannot be met, the Planning Department would still encourage providing some Class 1 spaces within the building’s interior and Class 2 spaces along the sidewalk, as space and demand for such parking allows.

4. **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 pedestrians and cyclists.

   This project is located on a pedestrian, vehicular, and bike high-injury corridor and is encouraged to incorporate safety measures into the project.
5. **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 must 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, the 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 Planning Director Bulletin No. 4: Review of Projects in Identified Areas Prone to Flooding, available at [http://www.sf-planning.org/ftp/files/publications_reports/DB_04_Flood_Zones.pdf](http://www.sf-planning.org/ftp/files/publications_reports/DB_04_Flood_Zones.pdf).

6. **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 would be constructed above, under, or adjacent to major SFPUC infrastructure. For projects meeting these criteria, please contact SFPProjectReview@sfwater.org for an SFPUC Project Review and Land Use Application. For more information regarding SFPUC Project Review or any of the SFPUC requirements, please visit [www.sfwater.org/reqs](http://www.sfwater.org/reqs).

7. **Downtown Area Plan.** The subject property falls within the area covered by the Downtown Area Plan in the General Plan. As proposed, the project is generally consistent with the overarching objectives of the Plan; however the proposed project is not fully consistent with key policies related to commercial space, urban design, and transportation. The project sponsor is encouraged to read the full plan, which can be viewed at: [http://generalplan.sfplanning.org/Downtown.htm](http://generalplan.sfplanning.org/Downtown.htm).

**PRELIMINARY PROJECT ASSESSMENT EXPIRATION:**

This Preliminary Project Assessment is valid for a period of 18 months. An Environmental Evaluation or Variance, or Building Permit application, as listed above, must be submitted no later than July 9, 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: Flood Notification: Planning Bulletin
Preliminary Project Assessment

cc: Proof School, Property Owner
    Andrew Perry, Current Planning
    Michael Li, Environmental Planning
    Andrea Nelson, Citywide Planning and Analysis
    Jonas Ionin, Planning Commission Secretary
    Charles Rivasplata, SFMTA
    Jerry Sanguinetti, Public Works
    Pauline Perkins, SFPUC
    June Weintraub and Jonathan Piakis, DPH
    Planning Department Webmaster (webmaster.planning@sfgov.org)
Review of Projects in Identified Areas Prone to Flooding

PURPOSE:
This bulletin alerts project sponsors to City and County review procedures and requirements for certain properties where flooding may occur.

BACKGROUND:
Development in the City and County of San Francisco must account for flooding potential. Areas located on fill or bay mud can subside to a point at which the sewers do not drain freely during a storm (and sometimes during dry weather), and there can be backups or flooding near these streets and sewers. The attached graphic illustrates areas in the City prone to flooding, especially where ground stories are located below an elevation of 0.0 City Datum or, more importantly, below the hydraulic grade line or water level of the sewer. The City is implementing a review process to avoid flooding problems caused by the relative elevation of the structure to the hydraulic grade line in the sewers.
PERMIT APPLICATION PROCESS:
Applicants for building permits for new construction, change of use, change of occupancy, or major alterations or enlargements will be referred to the San Francisco Public Utilities Commission (SFPUC) at the beginning of the process to determine whether the project would result in ground-level flooding during storms. 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, the Department of Building Inspection, or the Redevelopment Agency.

The SFPUC and/or its delegate (SFDPW, Hydraulics Section) will review the permit application and comment on the proposed application and the potential for flooding during wet weather. The SFPUC will receive and return the application within a two-week period from date of receipt. The permit applicant must comply with SFPUC requirements for projects in flood-prone areas. Such requirements may include provision of a pump station for the sewage flow, raised elevation of entryways, special sidewalk construction, and deep gutters.
FOR MORE INFORMATION:
Call or visit the San Francisco Planning Department

Central Reception
1650 Mission Street, Suite 400
San Francisco CA 94103-2479
TEL: 415.558.6378
FAX: 415 558-6409
WEB: http://www.sfplanning.org

Planning Information Center (PIC)
1660 Mission Street, First Floor
San Francisco CA 94103-2479
TEL: 415.558.6377
Planning staff are available by phone and at the PIC counter. No appointment is necessary.