DATE: February 4, 2014
TO: Steve O’Connell, Grosvenor CapCo Limited
FROM: Mark Luellen, Planning Department
RE: PPA Case No. 2013.1757U
240 Pacific Avenue / 720 Battery Street

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Lily Yegazu, at (415) 575-9076 or lily.yegazu@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

Mark Luellen, Senior Planner
Preliminary Project Assessment

Date: February 4, 2014
Case No.: 2013.1757U
Project Address: 240 Pacific Avenue / 720 Battery Street
Block/Lot: 0611/003 & 006
Zoning: C-2 (Community Business) District
Washington Broadway Special Use District
84-E Height and Bulk
Area Plan: N/A
Project Sponsor: Steve O’Connell
Grosvenor CapCo Limited
One California Street, Suite 2500
San Francisco, CA 94111
415-434-0175
Staff Contact: Lily Yegazu – 415-575-9076
lily.yegazu@sfgov.org

DISCLAIMERS:

Please be advised that this determination does not constitute an application for development with the Planning Department. It also does not represent a complete review of the proposed project, a project approval of any kind, or 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, Department of Public Works, Department of Public Health, and others. The information included herein is based on plans and information provided for this assessment and 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 consists of two adjacent lots creating a flag lot property with frontages on Pacific Avenue and Battery Street. The combined parcels are approximately 10,387.5 square feet in area with 85 feet of frontage on Pacific Street and 40 feet frontage on Battery Street. A surface parking lot occupies both lots with no permanent structures on the properties. The subject properties are located at the northern edge of the Financial District, bordering the North Beach neighborhood, within a C-2 (Community Business) Zoning District, the Washington-Broadway Special Use District (Subarea 2) and an 84-E Height and Bulk District.

The proposal is to remove the surface parking lots and construct a 7-story, 84-foot tall residential condominium building with 33 dwelling units, 1,847 square feet of commercial space and 49 parking
spaces within at grade and one below grade garage that utilizes car stackers. The new building would have an L-shaped footprint with frontages along both Pacific Avenue and Battery Street.

As part of the proposal, the property to the south of 240 Pacific Avenue may be acquired and be incorporated in the subject site, enlarging the frontage along Pacific Avenue. The address of this property is 290 Pacific Avenue (Block 0166 Lot 004) and is located within the same Zoning (C-2) District and 84-E Height and Bulk District.

ENVIRONMENTAL REVIEW:

In order to begin formal environmental review, please submit an Environmental Evaluation Application (EE Application). See page two of the current Fee Schedule for calculation of environmental application fees. Below is a list of topic areas that would require additional study based on our preliminary review of the project as it is proposed in the Preliminary Project Assessment (PPA) submittal received December 4, 2013.

1. **Historic Architectural Resources.** The proposed project sites are currently paved and are being used as surface parking lots with no existing structures on the proposed project site. The third optional property at 290 Pacific Avenue was built in 1911 and is a potential historic resource (rated “B”). The Planning Department’s records indicate that the property at 240 Pacific Avenue (0166/003) was demolished in 1989 under demolition permit number 8804420 and the property at 720 Battery Street was never developed. The property at 240 Pacific Avenue is located on the north side of Pacific Avenue and the property at 720 Battery Street is located on the east side of Battery Street, within a block bounded by Battery and Front Streets, Pacific Avenue and Broadway. One block north of the subject properties is the National Register-eligible Northeast Waterfront Historic District and one block west is the National Register Jackson Square Historic District. The two subject lots when combined create a flag lot where the inner corner is occupied by two buildings. The property at the northeast corner of Battery Street and Pacific Avenue was built in 1907 and commonly known as Old Ship Saloon (712 Battery Street / 298 Pacific Avenue) is a known historic resource “A”. The property to the north of 720 Battery, located at 724 Battery Street is also a known historic resource (rated “A”), was built in 1867 and is commonly known as Steifwater Building and. Due to the proximity of the subject sites to nearby designated Landmark District and National Register-eligible District, as well as individual known historic resources, the proposed project is subject to the Department’s Historic Preservation review. In addition, the proposed project includes the option of acquiring and demolition of a potential historic resource. Therefore the review would include preparation of a Historic Resource Evaluation (HRE) by a qualified professional who meets the Secretary of the Interior’s Professional Qualification Standards. Upon submittal of an EE Application, the Department will provide project sponsor with a list of three consultants from the Historic Preservation Consultant Pool, which shall be known as the potential consultant list or PCL. After submittal of the EE Application, please contact Tina Tam, Senior Preservation Planner, via email (tina.tam@sfgov.org) for the list of three consultants. Upon selection of the historic resource consultant, the scope of the HRE shall be prepared in consultation with Department Preservation staff. If the HRE determines that the existing building is an historic resource and Department Preservation staff concurs, the proposed

---

demolition would constitute an unavoidable significant impact on the environment and preparation of an Environmental Impact Report (EIR) would be required.

2. **Archeological Resources.** The proposed project would include excavation to approximately 25 feet, at its deepest, and result in a ground disturbance of 5,000 gross square feet or more. The Planning Department’s records indicate that the proposed project site is located in a potentially archeological sensitive area. Based on this, the proposed project would require a Preliminary Archeological Review (PAR), which would be conducted in-house by the Planning Department Archeologist or a Preliminary Archeological Sensitivity Assessment (PASS) prepared by a Department Qualified Archeological Consultant and subject to the review and approval by the Department Archeologist.

The PAR will: (1) determine what type of soils disturbance/modifications would result from the proposed project, such as excavation, installation of foundations, soils improvements, site remediation, etc.; (2) determine whether or not the project site is located in an area of archeological sensitivity; and (3) determine what additional steps are necessary to identify and evaluate any potential archeological resources that may be affected by the proposed project. Helpful to the PAR process is the availability of geotechnical or soils characterization studies prepared for the proposed project along with the proposed foundation type and maximum depth of excavation.

3. **Transportation.** Based on a preliminary review of the PPA submittal, the proposed 33 new residential units and approximately 1,847 square feet of commercial uses would result in approximately 78 P.M. peak-hour person-trips and a transportation study is not likely required for this project. This determination is preliminary in nature and will be revisited upon submittal of the EE Application. In the event a transportation study is required, the study should be prepared by one of three transportation consultants assigned to the proposed project by the Planning Department during the environmental review process. Please see the Planning Department’s Environmental Planning webpage “Resources for Consultants” for further information on administration of the consultant pool.

Based on the review of the preliminary plans by the Planning Department, transportation staff has the following initial feedback on the proposed project:

- Site plans should include existing and proposed driveway/curb cut dimensions, and where existing curb cut(s) are proposed for removal.
- Clarify the types of parking/loading proposed at new on-street curb locations
- Consider less parking for 33 units, small retail area – 49 parking spaces is excessive
- Show streetscape improvements consistent with the Better Streets Plan
- Project should include bike parking, ideally at ground level.

Based on the above concerns, the Department transportation staff would review the project plans upon submittal of the EE Application.

4. **Air Quality.** The proposed project at 33 units and 1,847 square feet of commercial uses is below the Bay Area Air Quality Management District’s (BAAQMD) 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.

Project-related demolition, excavation, grading and other construction activities may cause wind-blow dust that could contribute particulate matter into the local atmosphere. To reduce construction dust impacts, the San Francisco Board of Supervisors approved the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI). Pursuant to the Construction Dust Ordinance, the proposed project would be required comply with applicable dust control requirements outlined in the ordinance.

In addition, San Francisco has partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed “Air Pollutant Exposure Zones,” were identified. Land use projects within these Air Pollutant Exposure Zones require special consideration to determine whether the project’s activities would expose sensitive receptors to substantial air pollutant concentrations. Although the proposed project is not within an Air Pollutant Exposure Zone, improvement measures may be recommended for consideration by City decision makers such as exhaust measures during construction and enhanced ventilation measures as part of building design. Enhanced ventilation measures will be the same as those required for projects, such as this project, subject to Article 38 of the Health Code.

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. Given the proposed project’s height of approximately 82 feet, the proposed project would likely require a backup diesel generator and additional measures may be necessary to reduce its emissions. Detailed information related to any proposed stationary sources shall be provided with the EE Application.

5. **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 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.

---

2 BAAQMD, CEQA Air Quality Guidelines, May 2011, Chapter 3.
3 Refer to [http://www.sfdph.org/dph/eh/Air/default.asp](http://www.sfdph.org/dph/eh/Air/default.asp) for more information.
6. **Geology.** The project sponsor is required to submit a geotechnical investigation prepared by a qualified consultant to identify the primary geotechnical concerns associated with the proposed project and site. The geotechnical investigation should identify hazards (among them those related to the project site having a slope of 20 percent or greater, and being susceptible to liquefaction) and recommend minimization measures for potential issues regarding, but not limited to, soil preparation and foundation design. The geotechnical investigation should be submitted with the EE Application and will also help assist in the archeological review of the project (See Archeological Resources Section above).

7. **Shadow.** The proposed project would result in construction of a building approximately 82 feet in height. Planning Code Section 295 requires that a shadow analysis be performed to determine whether a project has the potential to cast shadows on properties under the jurisdiction of the San Francisco Recreation and Park Commission. Planning Department staff has prepared a preliminary shadow fan that indicates the project would not cast new shadow on any properties under the jurisdiction of the Recreation and Park Department. However, the preliminary shadow fan does indicate that the proposed project could cast shadows on Sydney G. Walton Square, a private recreational resource. Please note that this preliminary shadow fan does not account for the presence of intervening buildings or shadow already cast on these properties. Further graphic analysis may be necessary to definitively conclude that there will or will not be shadow impacts to Sydney G. Walton Square.

8. **Wind.** The proposed project would involve construction of a building approximately 82 feet in height. A screening-level wind analysis may be required to determine whether the proposed building is expected to cause adverse ground-level wind speeds.

9. **Flooding.** The proposed project falls within an area in the City prone to flooding during storms, especially where ground stories are located below an elevation of 0.0 City Datum or, below the hydraulic grade line or water level of the sewer. The City has implemented a review process to avoid flooding problems caused by the relative elevation of the structure to the hydraulic grade line in the sewers. Applicants for building permits for either new construction, change of use (Planning) or change of occupancy (Building Inspection), or for major alterations or enlargements will be referred to the SFPUC for review of the project for potential for ground-level flooding during storms.

10. **Stormwater.** If the project results in a ground surface disturbance of 5,000 square feet or greater, 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, the Stormwater Design Guidelines, or download instructions for the Stormwater Control Plan, go to http://sfwater.org/sdg.

11. **Hazards.** The Planning Department’s records indicate that the project site is located in an area of the City identified as having known or suspected soil and/or groundwater contamination (Maher site). Because of the project site location and that the proposed project would involve excavation of more than 50 cubic yards of soil, the proposed project may be subject to the provisions of Article 22A of the Health Code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22A.6. The Phase I would determine the potential for site contamination and level of exposure risk associated with the proposed 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, [http://www.sfdph.org/dph/EH/HazWaste/hazWasteSiteMitigation.asp](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](http://www.sfdph.org/dph/EH/ Fees.asp#haz). Please provide a copy of the submitted Maher Application and Phase I ESA with the EE Application.

12. **Tree Removal.** The Department of Public Works Code Section 8.02-8.11 requires disclosure and protection of landmark, significant, and street trees located on private and public property. Any tree identified in this Disclosure Statement must be shown on the site plans with size of the trunk diameter, tree height, and accurate canopy drip line. Please submit the Tree Planting and Protection Checklist with the Environmental Evaluation Application and ensure trees are appropriately shown on site plans.  

13. **Notification of a Project Receiving Environmental Review.** Notice is required to be sent to occupants of properties adjacent to the proposed project site and owners of properties within 300 feet of the project site. Please be prepared to provide these mailing labels upon request during the environmental review process.

An initial study would likely be prepared for the proposed project. The initial study may be prepared either by an environmental consultant from the Department’s environmental consultant pool or by Department staff. If the initial study finds that the project would have a significant impact that could be reduced to a less-than-significant level by mitigation measures agreed to by the project sponsor, then the Department would issue a preliminary mitigated negative declaration (PMND). The PMND would be circulated for public review for a period of 20 calendar days, during which time concerned parties may comment on and/or appeal the determination. If an appeal is filed, the Planning Commission would hold

---

a hearing to decide the appeal. If no appeal is filed, the Planning Department would issue a final mitigated negative declaration (FMND).

If the initial study indicates that the project would result in a significant impact that cannot be mitigated to below a significant level, an EIR must be prepared by an environmental consultant from the Planning Department’s environmental consultant pool. The Planning Department would provide more detail to the project sponsor regarding the EIR process should this level of environmental review be required.

**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. **Building Permit Application.** A Building Permit Application is required for the demolition of the existing building at 290 Pacific Avenue, preparation of the site, and for the proposed new construction. Building Permit Applications are available at the Department of Building Inspection at 1660 Mission Street.

2. **Variance.** As proposed, the project will require a Rear Yard and Exposure variances from the Planning Code Section 134 and 140. Please see Preliminary Project Comments #2 and #5.

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](http://www.sfplanning.org). Building Permit applications are available at the Department of Building Inspections at 1660 Mission Street.

**NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:**

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

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

1. **Bicycle Parking.** In addition to Planning Code requirements for secure bicycle parking, the proposed building must comply with Policy 28.1 of the Transportation Element of the San Francisco General Plan, which calls for secure bicycle parking in all new private developments:

   **POLICY 28.1: Provide secure bicycle parking in new governmental, commercial, and residential developments.** Bicycle parking should be provided in all new public and private buildings.

2. **Vehicle Parking.** The project proposes more off-street vehicle parking spaces than are required by the Planning Code. These excessive parking spaces are both unnecessary, due to the plentiful transit options in the area, and undesirable since they would induce additional vehicle trips which could adversely impact transit operations on congested area streets. Objective 32 and Policy 34.1 of the Transportation Element of the San Francisco General Plan call for limiting parking in the downtown area and other areas well served by transit:

   **OBJECTIVE 32: LIMIT PARKING IN DOWNTOWN TO HELP ENSURE THAT THE NUMBER OF AUTO TRIPS TO AND FROM DOWNTOWN WILL NOT BE DETRIMENTAL TO THE GROWTH OR AMENITY OF DOWNTOWN.**

   **POLICY 34.1: Regulate off-street parking in new housing so as to guarantee needed spaces without requiring excesses and to encourage low auto ownership in neighborhoods that are well served by transit and are convenient to neighborhood shopping.**

PRELIMINARY PROJECT COMMENTS:

The following comments address specific Planning Code and other general issues that may significantly impact the proposed project. For the purpose of providing these comments, the ground floor units along Clara Street are considered non-residential. Designation of these units as residential may alter some of the comments below.

1. **Interdepartmental Project Review.** This review is required for all proposed new construction in seismic hazard zones, in which the subject property falls. An application is enclosed.

2. **Rear Yard.** Section 134 requires the project to provide a rear yard of at least 25 percent of the lot depth. Because this project is a flag lot with frontages along two streets, one of the street frontages (Pacific Street or Battery Street) must be designated as the front of the property, and the rear yard would then be provided based on that determination. The “interior corner” configuration proposed for the rear yard is not permitted, except as an approved modification through a Variance process.

3. **Streetscape and Pedestrian Improvements - Street Trees.** Planning Code Section 138.1 requires one street tree for every 20 feet of frontage for new construction. Two street trees are shown on Battery Street and four street trees are shown on Pacific Avenue. The project appears to meet this requirement.
4. **Bird Safety.** Planning Code Section 139 requires Bird-Safe Glazing Treatment if the proposal includes unbroken glazed segments of 24 square feet or larger. Please verify whether the proposed glazing includes segments that are 24 square feet or larger and include information for glazing treatment that meet this requirement.

5. **Exposure.** 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 those units that only have windows fronting the rear yard area. Therefore, the proposed project requires revision to meet the minimum exposure requirement once the rear yard area is established, or you may request and justify an exposure exception through the Variance process. The Department generally encourages projects to minimize the number of units needing an exposure exception.

6. **Off-Street Parking.** Planning Code Section 151 requires one automobile parking space per dwelling unit. Furthermore, Planning Code Section 204.5 allows accessory parking facilities to include only those facilities which do not exceed 150 percent of the required number of spaces where three or more spaces are required by the Planning Code. The project proposes forty-nine parking spaces which is a total of the 33 parking spaces required plus 150 percent of the required spaces. The project appears to meet this requirement.

7. **Bicycle Parking.** Planning Code Section 155.2 requires one Class 1 bicycle space per dwelling unit, one Class 2 bicycle space per 20 dwelling units, and a minimum of two Class 2 spaces for the commercial use. Alternatively, an in-lieu fee can be accepted for the required Class 2 spaces per Planning Code Section 430. The project proposes a bike room for 35 Class 1 spaces. Please review Zoning Administrator Bulletin No. 9 - Bicycle Parking Standards: Design and Layout (http://www.sf-planning.org/ftp/files/publications_reports/ZAB_BicycleParking_9-7-13.pdf) and submit a detailed floor plan showing that the required number of Class 1 spaces meet the minimum clearances needed in the proposed bike room or revise the proposal to meet the requirement. Please also indicate in future submittals how the Class 2 requirement is being met.

8. **Car sharing.** Planning Code Section 166 requires this project to provide at least one car share space. The proposed project contains no car share spaces.

9. **Unbundled Parking.** Planning Code Section 167 allows for off-street parking spaces with 10 dwelling units or more, to be leased or sold separately from the rental or purchase fees for dwelling units. In cases where there are fewer parking spaces than dwelling units, the parking spaces shall be offered first to the potential owners or renters of three-bedroom or more units, second to the owners or renters of two bedroom units, and then to the owners or renters of other units. Renters or buyers of on-site inclusionary affordable units provided pursuant to Planning Code Section 415 shall have an equal opportunity to rent or buy a parking space on the same terms and conditions as offered to renters or buyers of other dwelling units, and at a price determined by the Mayor's Office of Housing,
subject to procedures adopted by the Planning Commission notwithstanding any other provision of Planning Code Section 415. Please indicate in future submittals if unbundled parking is being offered.

10. **Floor Area Ratio (FAR).** Planning Code Section 124(c) requires that buildings within the C-2 Zoning District have a basic FAR of 4.8 to 1, for a lot which is nearer to an RM-4 or RC-4 District than to any other R District. Future submittals should provide a detailed calculation of the gross floor area of the project, including floor plans which clearly indicate those areas included within the calculation of “gross floor area” pursuant to the definition in Planning Code Section 102.9. Please indicate in future submittals how this FAR is accomplished.

11. **Dwelling Unit Density.** Planning Code Section 215(a) allows dwelling at a density ratio not exceeding the number of dwelling units permitted in the nearest R District, which is RC-4 District. Planning Code Section 209.1(l) allows a maximum dwelling at a density ratio not exceeding one dwelling unit for each 200 square feet of lot area (up to 52 units). The submitted PPA application indicated a dwelling unit density of 33 units. This comment is included to clarify that this code section is met.

12. **Bulk Limit.** Planning Code Section 270 allow a maximum building length of 110 feet and a maximum diagonal dimension of 140 feet. The project proposes a maximum building length of 85 feet and a maximum diagonal dimension of approximately 103 feet. Deviations from the bulk limit may be permitted through the Conditional Use review process pursuant to Planning Code Section 271. As currently proposed, the requirements appear to be met.

13. **Shadow Analysis.** Planning Code Section 295 requires a shadow analysis for any building over 40 feet in height. The project proposes construction of a building approximately 82 feet in height. A preliminary shadow analysis indicated that no public space under the jurisdiction of the Recreation and Park Department would be shadowed by the proposal, as represented in the plan set submitted with the Preliminary Project Assessment. Please refer to Environmental Review Comment # 7 for additional comments.

14. **Stormwater.** Projects that disturb 5,000 square feet or more of the ground surface must comply with the Stormwater Design Guidelines and submit a Stormwater Control Plan to the SFPUC for review. To view the Guidelines and download instructions for preparing a Stormwater Control Plan, go to [http://stormwater.sfwater.org/](http://stormwater.sfwater.org/). Applicants may contact stormwaterreview@sfwater.org for assistance.

15. **Recycled Water.** The City requires property owners to install dual-plumbing systems for recycled water use in accordance with Ordinances 390-91, 391-91, and 393-94, within the designated recycled water use areas for new construction projects larger than 40,000 square feet. Please see the attached SFPUC document for more information.

16. **Inclusionary Housing.** Affordable housing is required for a project proposing ten or more dwelling units. The Project Sponsor must submit an ‘Affidavit for Compliance with the Inclusionary Affordable Housing Program: Planning Code Section 415’ to the Planning Department identifying
the method of compliance, on-site, off-site, or in-lieu fee. Any on-site affordable dwelling-units proposed as part of the project must be designated as owner-occupied units, not rental units. Affordable units designated as on-site units shall be sold as ownership units and will remain as ownership units for the life of the project.

PRELIMINARY DESIGN COMMENTS:

The following comments address preliminary design issues that may significantly impact the proposed project:

1. **General.** The proposed building is located between two lower-scale historic resources, which creates the opportunity and obligation to respond to the qualities of those buildings.

2. **Site Design, Open Space, and Massing.** The site design and open space on balance seem appropriate. However, to provide a transition that responds to the scale and massing between the proposed and the adjacent buildings, the Planning Department recommends exploring the following massing reductions. On the Battery frontage the design should explore a front setback on the upper floors; and along the side lot line perpendicular to Pacific, the Planning Department recommends a set back at the upper stories.

3. **Street Frontage.** The Planning Department appreciates the high ground floor. At this stage it is unclear from the elevations the design intent for the ground floor façade. Please provide enlarged plans and elevations of the storefronts on all facades.

4. **Vehicle Circulation, Access and Parking.** The Planning Department recommends minimizing the width of vehicular access. A single 12 foot wide opening for residential parking ingress and egress from Pacific Street should be sufficient for the limited number of parking spaces and anticipated trips. An interior queuing bay may be incorporated to accommodate cars that may come and go at the same time.

Furthermore, consider consolidating any trash and loading functions behind the garage entrance to maintain a single vehicular entry and curb cut devoted service functions along the frontage.

5. **Architecture.** The Planning Department recommends horizontal and vertical modulation as appropriate to be compatible with adjacent architecture. Projecting balconies may not be appropriate at street frontages.

Because of the relatively low heights of the corner building in relation to the proposed building’s height, the side facades will be visible. All visible sides of the building should be treated in a similar manner as the main facades.

PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Conditional Use Authorization, or Building Permit Application, as listed above, must be submitted no
later than **August 4, 2016**. 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: Shadow Fan
SFPUC Recycled Water Information Sheet

cc: John J. Nock, Property Owner
Lily Yegazu, Current Planning
Melinda Hue, Environmental Planning
Amnon Ben-Pazi, Citywide Planning and Analysis
Jerry Robbins, MTA
Jerry Sanguinetti, DPW
The City and County of San Francisco (CCSF) does not guarantee the accuracy, adequacy, completeness or usefulness of any information. CCSF provides this information on an "as is" basis without warranty of any kind, including but not limited to warranties of merchantability or fitness for a particular purpose, and assumes no responsibility for anyone's use of the information.

Title: 240 Pacific Avenue/720 Battery Street (Case No. 2013.1757U)
Comments: Assume height of 82 feet
Printed: 4 February, 2014
San Francisco Public Utilities Commission
Recycled Water Installation Procedures for Developers

The City and County of San Francisco (CCSF) requires property owners to install dual-plumbing systems for recycled water use in accordance with Ordinances 390-91, 391-91, and 393-94, within the designated recycled water use areas under the following circumstances:

- New or remodeled buildings and all subdivisions with a total cumulative area of 40,000 square feet or more
- New and existing irrigated areas of 10,000 square feet or more

The following are procedures to guide developers and property owners with the installation of recycled water service lines. The diagram on the reverse shows how, and where the lines are to be installed, and the required backflow prevention assembly.

**Number of Water Lines Coming onto a Property**
Three to four lines:
1) Fire
2) Potable water domestic
3) Recycled water domestic
4) Recycled water irrigation (if property has landscaping)

**Number of Water Meters**
One water meter is required for each water line.

**Required Backflow Prevention Assembly**
- Fire line – reduced pressure principle backflow preventer
- Potable water domestic – reduced pressure principle backflow preventer
- Recycled water domestic – reduced pressure principle backflow preventer
- Recycled water irrigation line – reduced pressure principle backflow preventer

All backflow prevention assemblies must be approved by the SFPUC’s Water Quality Division.

The backflow prevention assembly for domestic water plumbing inside the building and for the recycled water system must meet the CCSF’s Plumbing Code and Health Code.

**Pipe Separation**
California Department of Public Health regulations require new water mains and new supply lines to be installed at least 4-foot horizontally from, and one-foot vertically above a parallel pipeline conveying recycled water.

**Pipe Type**
- Transmission lines and mains – ductile iron
- Distribution and service lines – purple PVC or equivalent
- Irrigation lines – purple PVC or equivalent
- Dual-plumbing – described in the City and County of San Francisco Plumbing Codes

**SFPUC must sign off on pipe type prior to installation.** Contact the City Distribution Division at (415) 550-4952.

**Temporary Potable Water Use Until Recycled Water Becomes Available**
The potable water line will be used to feed the recycled water lines(s) until such time that recycled water becomes available. When recycled water becomes available, the cross-connection will be broken by the SFPUC, and the potable and recycled water lines will be totally separated. Before recycled water is delivered to the property, cross-connection and backflow testing will take place to assure separation.

Under no circumstances are developers or property owners to “t-off” of the potable water line to the recycled water lines(s).

**If you have questions, or would like additional information:**

**Recycled Water Ordinances**
San Francisco Public Utilities Commission
Water Resources Division
(415) 554-3271

**Backflow Prevention**
San Francisco Public Utilities Commission
Water Quality
(650) 652-3100

**Recycled Water Plumbing Codes**
Department of Building Inspection
Plumbing Inspection Services
(415) 558-6054

**New Service Line Permits**
San Francisco Public Utilities Commission
Customer Services
(415) 551-3000
NOTE:

1. ALL BACKFLOW PREVENTERS MUST BE APPROVED BY SFPUC WATER QUALITY BUREAU.

2. BACKFLOW PREVENTION FOR DOMESTIC WATER PLUMBING INSIDE THE BUILDING MUST MEET CCSF PLUMBING CODE AND PUBLIC HEALTH CODE REQUIREMENTS.

3. BACKFLOW PREVENTER FOR RECYCLED WATER SYSTEM MUST MEET CCSF PLUMBING CODE AND PUBLIC HEALTH CODE REQUIREMENTS.

RESPONSIBILITY OF INSTALLATION OF

HEAVY LINES:
PROPERTY OWNER PAYS FOR NEW SERVICE INSTALLATION, SFPUC RETAINS OWNERSHIP OF NEW SERVICE UP TO THE END OF METER ASSEMBLY.

LIGHT LINES: &
PROPERTY OWNER PAYS FOR NEW SERVICE INSTALLATION, OWNERSHIP REMAINS WITH THE PROPERTY OWNER.