DATE: November 21, 2011
TO: Sierra Maestra Properties
FROM: Julian Banales, Planning Department
RE: PPA Case No. 2011.0895U
460-462 Bryant Street

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Tara Sullivan, at (415) 558-6257 or tara.sullivan@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

[Signature]
Julian Banales, Senior Planner

cc: Reuben & Junius LLP
Preliminary Project Assessment

Date: November 21, 2011
Case No.: 2011.0895U
Project Address: 460-460 Bryant Street
Block/Lot: 3763, 015A & 015C
Zoning: MUO (Mixed Use Office) District
45-X Height & Bulk District
Project Sponsor: Reuben & Junius LLP
415-567-9000
Staff Contact: Tara Sullivan – 415-558-6258
tara.sullivan@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 legal lots and addresses: 460 Bryant Street (B/L: 3763/015A) and 462 Bryant Street (B/L: 3763/015C) (hereinafter “the project site”). Both properties are through lots with facades on Stillman Street and are located on the south side of Bryant Street between 2nd and 3rd Streets. Stillman Street is directly adjacent to the Route 80 ramps, and the site is one block south from South Park.

460 Bryant Street is a three-story masonry building constructed in 1907 and was historically known as the Flieshmann Company Wholesale Liquor Building. The building has been included in the South of Market Area Plan Survey and given a rating of 5S3 (“Appears to be individually eligible for local listing or designation through survey evaluation”). 462 Bryant Street is a one-story masonry building constructed in 1907 and was historically known as the Hooper & Jennings Wholesale Grocery Building. The building has been included in the South of Market Area Plan Survey and was given a rating of 6L (“Determined ineligible for local listing through local government review process; may warrant special consideration in local planning”). Both buildings have generally served as warehouse uses but have been vacant for several years.
There is a two-sided general advertising sign on the roof of 462 Bryant Street, under separate ownership from the buildings. This sign is in compliance with the City’s General Advertising Sign Rules and Regulations as outlined in the Planning Code.

The proposal as submitted is to convert the buildings into one space with approximately 75,460 s/f of office use with 5,260 s/f of accessory parking and 8,320 s/f for mechanical and miscellaneous uses. The project includes the construction of a two-story addition on 460 Bryant Street (approximately 19,080 s/f), and façade alterations at the ground floors of both the Bryant and Stillman Street facades.

**ENVIRONMENTAL REVIEW:**

The proposed project is within the East South of Market Area Plan, an area plan which received environmental review through the Eastern Neighborhoods Environmental Impact Report (“EN EIR”). Mitigation measures are requirements that are applied to a development proposal for the purpose of reducing or eliminating potential adverse environmental effects of a project. The proposed project at 460-462 Bryant Street is within the Eastern Neighborhoods and certain mitigation measures from the EN EIR would be applied as conditions of approval for this project as described below.

The proposed project initially requires the following environmental review. This review may be done in conjunction with the required approvals listed below, but must be completed before any project approval may be granted. The following environmental review is based on the project description provided in the PPA application, which does not indicate that excavation would be required.

The Environmental Evaluation Application should include the following additional information: 1) if any excavation is required, provide the depth of excavation, 2) the application should expand upon the type and square footage of the last use of both buildings, 3) the existing and proposed site plans should clearly show the existing and proposed curb cuts and street trees, 4) the proposed site plan should show the dimensions of curb cuts, parking and loading spaces, 5) the application should consider parking access off of Stillman Street.

An **Environmental Evaluation Application** is required for the full scope of the project (demolition and expansion) and may include the following environmental topics:

1. **Transportation.** A Transportation Study is likely to be required for the proposed project. This determination is based upon the understanding that the site has been vacant for a number of years, requiring that the Transportation Study evaluate the entirety of the land use program and not simply the incremental amount of person trips generated by the 19,000 sf addition. Since this determination is preliminary in nature, the determination of whether a Transportation Study will be required for the proposed project will be reviewed again upon submittal of an EE application. This determination may change due to a project or project site change, surrounding conditions, Planning Code changes, other local or state regulation/requirements, or additional information.

2. **Historic Resources.** As noted above, the project site has been included in the **South of Market Area Plan Survey.** 462 Bryant Street was given a rating of 5S3, and under the CEQA Guidelines, is considered to
be a known historical resource. The Department must analyze the proposed alterations to this building. Please file the Part II Evaluation: Determination of Impact to a Historic Resource Application. Note that this application will not require a formal Historic Resource Evaluation Report to be conducted by a Preservation Professional; rather, Department Preservation staff will analyze the impacts of the proposed project to the project site. This application must include the following information:

a. Permit History: Please pull the full permit history from the Department of Building Inspection for 462 Bryant Street. Include copies of all permits and associated drawings, if any.

b. Photographs: Please include separate color photographs of the subject property (both buildings). Detail photographs should be included of all openings that are proposed for alteration. Include both Bryant and Stillman Street facades.

c. The proposed project was reviewed by the Preservation Staff on October 11, 2011. In order for the project not to have a significant adverse impact to the historical resource, staff recommends the following modifications:

i. 462 Bryant Street building: Please utilize either the existing loading dock opening or the existing building entrance opening for the main building entrance. The historic entrance (proposed to be the main entrance) should be retained in its historic configuration. This will have the least impact and removal of historic fabric.

ii. 460 Bryant Street building: Please setback the proposed addition from the front façade a minimum of 5 feet.

3. **Hazardous Materials.** The PPA application indicates that the site was previously used as industrial, retail and office uses. The site is not listed on a State database of hazardous sites and the project site is not subject to the Maher ordinance. Should the project require ground disturbance, a Phase I Environmental Site Assessment may be required to determine if the site may contain contaminated soils. The existing buildings on the project site may contain lead based paint and/or asbestos building materials and would be required to comply with local, State, and federal laws for disposal of contaminated building materials. Furthermore, the proposed project would be required to comply with the Eastern Neighborhoods Mitigation Measure L-1-Hazardous Building Materials. This mitigation measure requires that project sponsors ensure that any equipment containing Polychlorinated Biphenyls (PCBs) such as fluorescent light ballasts, are removed and properly disposed of according to applicable federal, state and local laws prior to the start of renovation and that any fluorescent light tubes, which could contain mercury, are similarly removed and properly disposed of.

4. **Archeology.** The PPA application does not indicate the need for excavation below the ground surface. The project site is within the Eastern Neighborhoods Archeology Mitigation Zone J-1 (Properties with Previous Studies). Should the project include excavation to a depth of 2.5 feet or greater, additional environmental review for potential archeological impacts would be required in compliance with the archeological mitigation measures in the EN EIR.

The proposed project would require a Preliminary Archeological Review (PAR) which would be conducted in-house by Planning Department archeologist. During the PAR it will be determined
what type of soils disturbance/ modification will result from the project, such as, excavation, installation of foundations, soils improvement, site remediation, etc. Should the project include ground disturbance, any available geotechnical/soils or hazardous materials report prepared for the project site will be reviewed at this time. Secondly, it will be determined if the project site is in an area that is archeologically sensitive. The results of this review is usually in the form of a memorandum to the Environmental Planner assigned to the project. When it is found that the project has the potential to affect an archeological resource, the PAR memorandum will identify appropriate additional actions to be taken including the appropriate archeological measure and/or if additional archeological studies will be required as part of the environmental evaluation.

5. **Geotechnical Investigation.** The project site is not located near an area subject to liquefaction potential, a Seismic Hazards Study Zone designated by the California Division of Mines and Geology.

6. **Compliance with Bay Area Air Quality Management District CEQA Air Quality Guidelines.** The information in this topic is based on the project description and plans provided. If this information is incorrect or changes, then the information for this topic would be re-evaluated. If construction activities require the use of diesel-powered construction equipment, that equipment would result in toxic air contaminate emissions that could affect nearby sensitive receptors. Sensitive receptors for potential air quality impacts include residential uses, schools, and daycare facilities. Residential uses are estimated at approximately 180 feet from the project site. A field visit should be conducted to confirm the location of the closest sensitive receptors. Information regarding the project's construction duration and equipment use is required to determine whether a construction health risk assessment is warranted. If required, an Air Quality Technical Report would be required and an environmental consultant with experience in air quality modeling must be retained to prepare a scope of work and the Air Quality Technical Report.

7. **Construction Noise.** Mitigation Measure F-2 from the EN EIR address construction noise impacts related to subsequent development projects within the Eastern Neighborhoods and are described below. Mitigation Measure F-2 (other construction noise) may apply to the proposed project. However, a determination as to whether or not Mitigation Measure F-2 would apply to the proposed project will be determined during the environmental review process. Mitigation Measure F-2 states that where it is determined that additional construction noise controls are necessary due to the nature of planned construction practices and the sensitivity of proximate uses, the Planning Director shall require that the project sponsor develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant. Prior to commencing construction, a plan for such measures shall be submitted to the Department of Building Inspection to ensure that maximum feasible noise attenuation will be achieved. The applicability of Mitigation Measure F-2 to the proposed project requires additional analysis and will be determined as part of the environmental evaluation.

8. **Noise Generating Uses.** Mitigation Measure F-3 from the EN EIR addresses the citing of noise generating uses. Office uses do not typically generate excessive noise levels, however the proposed
office’s mechanical equipment must comply with the San Francisco Noise Control Ordinance, Article 29 of the San Francisco Police Code. The Noise Control Ordinance limits the noise produced from any machine on a commercial or industrial property to no more than eight dBA above the local ambient noise levels at the property plane.

9. **Shadow Study Application and Fees.** Planning Code Section 147 states that any project over 50 feet in height in the Eastern Neighborhoods Plan Area requires a shadow analysis. In addition, Section 295 requires a shadow analysis for any building over 40 feet in height. The proposed project would result in construction of a building that is over 40 feet in height. The project therefore requires a shadow study, and you are required to submit a Shadow Study Application as detailed below. A separate fee is required. A Department staff person will be assigned to prepare the shadow fan analysis. If the project would result in potentially significant shadows, a more detailed consultant-prepared shadow study will be required.

10. **Greenhouse Gas Compliance Checklist for Private Development Projects.** Potential environmental effects related to Greenhouse Gas Emissions from the proposed project need to be addressed in a project’s environmental evaluation. An electronic version of the Greenhouse Gas Compliance Checklist Table 1 for Private Development Projects is available on the Planning Department’s website at [http://www.sfplanning.org/index.aspx?page=1886](http://www.sfplanning.org/index.aspx?page=1886). The project sponsor would 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 San Francisco’s Qualified GHG Reduction Strategy.

11. **Tree removal.** Photographs of the site show a number of existing street trees. During the environmental review process, these street trees would be evaluated for their potential to provide nesting habitat for migratory birds. Construction activities could impact nearby nesting birds. The federal Migratory Bird Treaty Act (MTBA) and the California Fish and Game Code Section 3513 protect migratory birds, declaring it illegal for any activity to result in a “take” of a migratory bird. “Take” is defined by the United States Fish and Wildlife Service to mean to “pursue, hunt, shoot, wound, kill, trap, capture or collect” any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. Birds can usually escape harm during construction activities by flying away, but during the nesting season, eggs and chicks may be in danger when construction activity begins. Tree trimming and building demolition/renovation during the nesting season (between February 1 through August 15) can harm or kill protected birds, resulting in a violation of federal and state law. Avoiding tree removal and/or the commencement of construction activities during the nesting season can avoid impacts to nesting birds. Should tree removal be required during the nesting season or should the beginning of construction activities occur during the nesting season, a pre-construction survey should be conducted to verify whether the street trees are supporting nesting birds. If nesting of migratory birds is confirmed, construction activities should be delayed until the nest is no longer active.
12. **Notification of a Project Receiving Environmental Review.** Notice is required to be sent to occupants of properties adjacent to the project site and owners of properties within 300 feet of the project site at the initiation of the environmental review process. Please provide these mailing labels at the time of the environmental evaluation application submittal.

Please note that this project appears to qualify for a Community Plan Exemption (“CPE”) subsequent to the Eastern Neighborhoods EIR. However, an Initial Study would be conducted as part of the environmental review process to investigate the specific environmental topics above. The results of those analyses will determine if there are site-specific peculiar impacts for the proposed project which were not addressed in the EN EIR. If so, the Initial Study will determine that either (1) the project may be issued a CPE with focused Negative Declaration stating that the project would not have a significant effect on the environment, or (2) that a CPE with a focused Environmental Impact Report (EIR) is required to analyze one or more potentially significant physical environmental impacts.

**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. **Environmental Evaluation Application:** An Environmental Evaluation Application must be filed so that the CEQA-related issues of the project can be evaluated and assessed. For more information on what is required in this application, please refer to the Environmental Review section above.

2. **Office Allocation:** Sections 320 and 321 (Office Development: Annual Limit) outline the requirements for approval of new office space in San Francisco. Any proposal for over 25,000 s/f of new office space requires approval by the Planning Commission. As the proposal calls for approximately 75,000 s/f of office space, the project is subject to this requirement. Please note that the Department is in receipt of the application for office allocation, thus this does not need to be resubmitted. However, any additional information identified in this letter should be submitted to Department staff for the project file.

3. **Shadow Study:** Planning Code Section 147 states that any project over 50 feet in height in the Eastern Neighborhoods Plan Area requires a shadow analysis. In addition, Section 295 requires a shadow analysis for any building over 40 feet in height. The proposed project would result in construction of a building approximately 55 feet in height. Please submit a Section 295 Shadow Study application for the Department to analyze the shadow impacts. Note that the shadow study will be conducted simultaneously with the shadow analysis undertaken as a part of the CEQA review.

4. **Building Permit:** Once the environmental review has been completed and office allocation entitlements have been approved by the Planning Commission, the Department must approve the associated building permit(s) for the project.

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:

There are several required notifications for the proposal at 460-462 Bryant Street. The Office Allocation requires a public hearing and has associated neighborhood notification (10 days mailed notice to all owners within 300 feet of the property and 20 day poster on-site).

Additionally, there are two notification processes for new construction projects within the Eastern Neighborhood Plan Areas: a pre-application notification meeting prior to submittal of a building application, and a second, Section 312 notification which requires 30-day mailed notification to owners and occupants within 150 of the property once the project is ready for approval (with a 30 day poster on-site). Please note that the Section 312 and the Office Allocation notice may be done concurrently.

All registered neighborhood group mailing lists are available online at www.sfplanning.org under the “Publications” tab.

PRELIMINARY PLANNING CODE COMMENTS:

The following comments address specific Planning Code and other general issues about the proposed project:

1. **Lot Issue:** The application is requesting whether the project site can be considered as one lot for the calculations of open space requirements (Section 135), office allocation requirements (Sections 320 and 321), and off-street parking, loading, and bike parking requirements (Sections 151.1, 152, 155.1), while be considered as two separate lots for the Floor Area Ration (“FAR”) calculations (Section 124).

   After consultation with the Zoning Administrator, the Department will consider the project site as one lot. Section 102.14 defines a lot as (emphasis added):

   “A parcel of land under one ownership which constitutes, or is to constitute, a complete and separate functional unit of development, and which does not extend beyond the property lines along streets or alleys. A lot as so defined generally consists of a single Assessor’s lot, but in some cases consists of a combination of contiguous Assessor’s lots or portions thereof where such combination is necessary to meet the requirements of this Code. In order to clarify the status of specific property as a lot under this Code, the Zoning Administrator may, consistent with the provisions of this Code, require such changes in the Assessor’s records, placing of restrictions on the land records, and other actions as may be necessary to assure compliance with this Code. The definition of “lot” shall also be applicable to piers under the jurisdiction of the Port Commission.”

Both 460 and 462 Bryant Street are under the same ownership. The materials submitted with the Preliminary Project Assessment and the Office Allocation applications state that the project is to create one new office building containing approximately 75,000 s/f of space. The building will have identifying signs with “460 Bryant”. The drawings submitted indicate that the two buildings have direct internal access, and there are several Planning Code requirements, such as the open space and off-street parking, that are utilizing the square footage of both buildings in one calculation to meet these provisions. Thus, the Department will be considering the project site to include both 460-462 Bryant Street in all Planning Code requirements and evaluations.
2. **Floor Area Ratio:** Section 124 states that properties with a height and bulk of 45-X have an FAR of 3:1. The proposal for the project site appears to exceed this requirement. Below are the Department’s calculations for the project site, based on information at the Department and the details of the proposal submitted:

Existing Conditions:

   a. **460 Bryant:** Total lot area = 11,640 s/f. Allowable Gross Floor Area (“GFA”) = 34,920 s/f. The as-built GFA = 46,550 s/f.

   b. **462 Bryant:** Total lot area = 11,639 s/f. Allowable GFA = 34,917 s/f. The as-built GFA = 23,410 s/f.

   c. **Project Site:** Total lot area = 23,280 s/f (150.196’ x 155’). Allowable GFA = 69,841.14 s/f (23,280 x 3). As-built GFA = 69,960 s/f. OVER FAR limit.

Proposed Conditions:

   a. **Project Site:** Total lot area = 23,280 s/f (150.196’ x 155’). Allowable GFA = 69,841.14 s/f (23,280 x 3). Proposed GFA = 69,880 s/f. OVER FAR limit.

Please note that the above numbers are approximate. The existing conditions have not been detailed and may not exclude space that is necessary to the operation or maintenance of the building (Section 102.9(b)(1)). The submitted materials indicate that the majority of the ground floor of the 460 Bryant Street building is to be for office use and associated areas. There currently is a large mechanical/furnace room at the northern portion of the floor which is proposed for office use. The Department will need drawings that include specifications and dimensions that indicate how the basement floor space will be used before confirming any of the FAR calculations. The FAR calculations will also need to take into account any modifications to the project, such as the open space requirements detailed below.

It was requested whether the bicycle parking is included or excluded in the GFA calculation. Section 102.9 does not specify that bike parking is to be included in the calculation of Gross Floor Area, and thus is excluded from the calculation.

3. **Architectural Drawings:** The drawings submitted in the original PPA application and those submitted on October 13th do not match. Specifically, the elevation drawings show a different treatment of the cornice of 462 Bryant. In addition, please submit proposed drawings with the rooms/floors dimensioned (particularly as it relates to the calculation of FAR). The drawings must be to scale and should be to architectural measurements. Please submit at least two (2) sets of drawings that are the most up-to-date. Sets of revised drawings will be required for each application currently on file with the Department.

4. **Photographs:** Please provide separate color photographs of the subject property (both facades) and adjacent properties (no larger than 8 ½ x 11).
5. **Open Space Requirement**: Section 135.3 requires that any structure that converts to office use within the Eastern Neighborhoods Plan Area must provide and maintain usable open space. For the subject property, the Code requires 1 square foot per 250 square feet of occupied floor area of new square footage. The proposal includes a new light well at 460 Bryant Street. It does not appear that the project is meeting this Code requirement. Please indicate the total square feet of occupied floor area, the square feet required under Section 135.3, and the square feet of the proposed open space. Be sure to indicate the square footage that is not included in the calculation of the occupied floor area as defined in 102.10 (“Occupied Floor Area”). Note that only non-accessory parking, loading, and driveway areas may be excluded, therefore all of the proposed accessory parking areas must be included in the open space calculations. Lastly, please indicate whether the open spaces are accessible to all tenants of the building or are to be used solely by particular tenants.

6. **Streetscape and Pedestrian Improvements Requirement**: Section 138.1 requires that any project that adds off-street parking meet street tree requirements. One tree must be provided for every 20 feet of street frontage on both Bryant and Stillman Streets. Please provide street tree improvements in your proposal and drawings. Note that these improvements may require additional approvals from the Department of Public Works.

7. **Off-Street Parking- Loading Dimensions**: Section 154(b) outlines the dimensions required for loading spaces. The proposed loading space does not appear to meet these requirements.

8. **TMA Brokerage Program**: Section 163 requires that any conversion of use over 25,000 s/f in the MUO Districts provides on-site transportation brokerage services for the actual lifetime of the project. This plan must be submitted and entered into with the Department prior to the issuance of a Temporary Certificate of Occupancy.

9. **Height**: The submitted drawings do not indicate whether the proposed addition is within the approval height limit and/or if it is meeting any exceptions under Section 260(b). Please indicate whether the proposed addition is meeting the height requirements.

10. **Transit Impact Development Fee**: The subject property is subject to the Transit Impact Development Fee in Section 411. This fee is calculated on the basis of the number of square feet of new development, multiplied by the square foot rate in effect at the time of building or site permit issuance for each of the applicable economic activity categories within the new development, as provided in Subsection 411.3(e).

11. **Jobs-Housing Linkage Program**: All projects that increase the gross square feet of office space by more than 25,000 s/f must participate in the Jobs-Housing Program as outlined in Section 413. Prior to issuance of a building or site permit for a development project the sponsor shall elect one of the three options: 1) contribute of a sum or land of value at least equivalent to the in-lieu fee to one or more housing developers who will use the funds or land to construct housing units; 2) pay an in-lieu fee to the Development Fee Collection Unit at DBI ($19.96 per gross s/f); or 3) a combination of the two options. Please indicate how this requirement will be met.

12. **Child Care Requirement**: All office uses must comply with the Child Care requirements of Section 414. This requirement may be met through variety of methods from providing child care facilities on site to paying a fee. Please refer to Section 414 for details and indicate how this requirement will be met.
13. **Eastern Neighborhood Impact Fee:** Properties located within the Eastern Neighborhoods Plan areas are subject to additional impact fees outlined in Section 423. The subject property is a Tier 1 site. Under the Code, the Impact Fee is $3/gross square foot for the conversion of the existing spaces from PDR to non-residential use, and is $6/gross square foot for the addition. This requirement may be met by providing community improvements outlined in Section 423.3(d). Please indicate how the project will meet this requirement.

**PRELIMINARY DESIGN COMMENTS:**

The project was reviewed by the Urban Design Advisory Team (“UDAT”) on October 20th. The following comments address preliminary design issues of the proposed project:

1. **Addition Bulk and Siting:** The proposed height of 462 Bryant addition is appropriate as submitted (assuming it meets the height requirements of the Code). However, the transition between the existing building and new addition using setbacks and open space/deck at the Bryant Street façade is awkward and seems unresolved. UDAT would like to encourage the design to pursue one of two options - either integrate the new façade with the old in the same plane, with minimal or no setback, or setback and distinguish the addition entirely from the existing building. As submitted, it appears too horizontal in relation to the proportions of the existing building.

2. **Addition Design:** While UDAT would like to have a contemporary design of the addition, the current design is too rigid, blocky, and is too ‘separate’ from the remainder of the site. No materials are indicated on the submitted drawings so UDAT was unable to comment on this aspect of the design. However, please clarify the intent of the façade treatment for Bryant Street. Overall the proposed architectural design as shown in the rendering should either emulate or contrast the rhythm, detail, and scale of the existing building. Raise the height of the addition façade to accentuate the vertical proportion of the existing ground floor.

3. **Parking Garage Opening:** UDAT strongly recommends relocating the entrance to the basement level parking to Stillman Street. There should be minimum curb cuts and off-street parking/traffic issues on Bryant Street and Stillman Street is a secondary street which is more appropriate for access to off-street parking. The proposed garage opening on Bryant is too disruptive to the façade. Lastly, the width for the garage opening should be as minimal as possible.

4. **Bryant Street Ground Floor Frontage:** UDAT has issues with four ‘bays’ on the Bryant Street façade. First, UDAT recommends the retention of the building entrance in its current location at the northern-most bay at 460 Bryant Street. Second, the existing loading dock ‘surround’ should be retained but infilled with a contemporary window system (that is, please retain the existing opening and the related material and details). UDAT also recommends retaining the historic entrance and door. Lastly, the bay where the off-street parking is accessed should be designed/infilled with a window system.

**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 May 20, 2012. 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.

cc: Sierra Maestra Properties, owner
Jessica Range, Environmental Planning