DATE: November, 10, 2015
TO: Andrey Libov
FROM: Joshua Switzky, Planning Department
RE: PPA Case No. 2015.010371PPA for 1082 Howard Street.

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Kimia Haddadan, at (415) 575-9068 or kimia.haddadan@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

Joshua Switzky, Senior Planner
Preliminary Project Assessment

Date: November, 10, 2015
Case No.: 2015.010371PPA
Project Address: 1082 Howard
Block/Lot: 3726/028
Zoning: MUG Mixed-Use General
Area Plan: Eastern Neighborhoods
Project Sponsor: Andrey Libov

Staff Contact: Kimia Haddadan– 415-575-9068
kimia.haddadan@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 August 10, 2015 as summarized below. This PPA letter identifies Planning Department review requirements for the proposed project, including those related to environmental review, approvals, neighborhood notification and public outreach, the Planning Code, project design, and other general issues of concern for the project. Please be advised that the PPA application does not constitute an application for development with the Planning Department. The PPA letter also does not represent a complete review of the proposed project, does not grant a project approval of any kind, and does not in any way supersede any required Planning Department approvals listed below.

The Planning Department may provide additional comments regarding the proposed project once the required applications listed below are submitted. While some approvals are granted by the Planning Department, some are at the discretion of other bodies, such as the Planning Commission or Historic Preservation Commission. Additionally, it is likely that the project will require approvals from other City agencies such as the Department of Building Inspection, Public Works, the Municipal Transportation Agency, Department of Public Health, San Francisco Public Utilities Commission, and others. The information included herein is based on the PPA application and plans, the Planning Code, General Plan, Planning Department policies, and local/state/federal regulations as of the date of this document, all of which are subject to change.

PROJECT DESCRIPTION:

The proposal is to demolish an existing 2,800 sq.ft. two story retail sales building and construct a new nine-story, eight dwelling unit, 83.5 foot tall, 10,478 sq. ft, multi-family residential building with no garage/parking. The ground floor will include lobby as active space. The lowest dwelling unit is on stories 1 & 2 and includes a private rear yard. Stories 3-9 include one dwelling per story and share a common space roof deck on the roof.
BACKGROUND:

Community Plan Exemption

The project site is within the Eastern Neighborhoods Area Plans. The Eastern Neighborhoods Area Plans cover the Mission (location of project site), East South of Market (SoMa), Showplace Square/Potrero Hill, and Central Waterfront neighborhoods. On August 7, 2008, the Planning Commission certified the Eastern Neighborhoods Programmatic Final Environmental Impact Report (Eastern Neighborhoods PEIR) by Motion 17659 and adopted the Preferred Project for final recommendation to the Board of Supervisors.1,2 The Eastern Neighborhoods Area Plans and its associated rezoning became effective December 19, 2008.

Section 15183 of the California Environmental Quality Act (CEQA) Guidelines states that projects that are consistent with the development density established by a community plan for which an environmental impact report (EIR) was certified do not require additional environmental review, except as necessary to determine the presence of project-specific significant effects not identified in the programmatic plan area EIR.

If the proposed project is consistent with the development density identified in the area plan, it would be eligible for a community plan exemption (CPE). Please note that a CPE is a type of exemption from environmental review, and cannot be modified to reflect changes to a project after approval. Proposed increases beyond the CPE project description in project size or intensity after project approval will require reconsideration of environmental impacts and issuance of a new CEQA determination.

Within the CPE process, there can be three different outcomes as follows:

1. **CPE Only.** All potentially significant project-specific and cumulatively considerable environmental impacts are fully consistent with significant impacts identified in the Eastern Neighborhoods PEIR, and there would be no new “peculiar” significant impacts unique to the proposed project. In these situations, all pertinent mitigation measures and CEQA findings from the Eastern Neighborhoods PEIR are applied to the proposed project, and a CPE checklist and certificate is prepared. With this outcome, the applicable fees are: (a) the CPE determination fee (currently $13,659) and (b) the CPE certificate fee (currently $7,580).

2. **Mitigated Negative Declaration.** If new site- or project-specific significant impacts are identified for the proposed project that were not identified in the Eastern Neighborhoods PEIR, and if these new significant impacts can be mitigated to a less-than-significant level, then a focused mitigated negative declaration is prepared to address these impacts, and a supporting CPE checklist is prepared to address all other impacts that were encompassed by the Eastern Neighborhoods PEIR, with all pertinent mitigation measures and CEQA findings from the Eastern Neighborhoods PEIR also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE

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determination fee (currently $13,659) and (b) the standard environmental evaluation fee (which is based on construction value).

3. **Focused EIR.** If any new site- or project-specific significant impacts cannot be mitigated to a less-than-significant level, then a focused EIR is prepared to address these impacts, and a supporting CPE checklist is prepared to address all other impacts that were encompassed by the Eastern Neighborhoods PEIR, with all pertinent mitigation measures and CEQA findings from the Eastern Neighborhoods PEIR also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently $13,659); (b) the standard environmental evaluation fee (which is based on construction value); and (c) one-half of the standard EIR fee (which is also based on construction value). An EIR must be prepared by an environmental consultant from the Planning Department’s environmental consultant pool ([http://www.sfplanning.org/ftp/files/MEA/Environmental_consultant_pool.pdf](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.

In order to begin formal environmental review, please submit an **Environmental Evaluation Application (EEA)**. The EEA can be submitted at the same time as the PPA Application. The environmental review may be done in conjunction with the required approvals listed below, but must be completed before any project approval may be granted. **Note that until an entitlement application is submitted to the Current Planning Division, only the proposed Project Description will be reviewed by the assigned Environmental Coordinator.** EEAs are available in the Planning Department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at [www.sfplanning.org](http://www.sfplanning.org) under the “Publications” tab. See “Environmental Applications” on page 2 of the current Fee Schedule for a calculation of environmental application fees.³

**ENVIRONMENTAL REVIEW:**

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 project proposes demolition of a non-contributor to the Western SOMA Light Industrial and Residential Historic District; therefore, the proposed demolition project is subject to review by the Department’s Historic Preservation staff. To assist in this review, the project sponsor must hire a qualified professional to prepare a Historic Resource Evaluation (HRE) report. The HRE scope will require a compatibility analysis of the new construction with the historic district and an impact analysis of the new construction on the historic district. The HRE scope will also require an individual evaluation of the subject building which was not completed as part of the previous survey. The qualified professional must be selected from the Planning Department’s Historic Resource Consultant Pool. Please contact Tina Tam, Senior Preservation Planner, via email

(tina.tam@sfgov.org) for a list of three consultants from which to choose. The selected consultant must scope the HRE in consultation with Department Historic Preservation staff. Please contact the HRE scoping team at HRE@sfgov.org to arrange the HRE scoping. Following an approved scope, the historic resource consultant should submit the draft HRE report for review to Environmental Planning after the project sponsor has filed the EE Application and updated it as necessary to reflect feedback received in the PPA letter. The HRE should be submitted directly to the Department and copied to the project sponsor. Project sponsors should not receive and/or review advance drafts of consultant reports per the Environmental Review Guidelines. Historic Preservation staff will not begin reviewing your project until a complete HRE is received.

2. **Archaeological Resources.** The project site lies within the *Archaeological Mitigation Zone J-2: Properties with No Previous Studies of the Eastern Neighborhoods Rezoning and Area Plans FEIR* that would require for the proposed project either Preliminary Archeological Review (PAR) conducted in-house by the Planning Department archeologist or, if requested, the preparation of a Preliminary Archeological Sensitivity Assessment (PASS) by a Department Qualified Archeological Consultant subject to the review and approval by the Department archeologist. The Department archeologist will determine the potential for the proposed project to affect archeological deposits. This determination will be based on the archeological sensitivity of the project site based on in-house source material and on potential soils disturbance/modification that may result from the project, such as, excavation, installation of foundations, soils improvement, site remediation, etc. The Department archeologist will need to review any available geotechnical/soils or phase II hazardous materials report prepared for the project. In those instances where the Department archeologist determines that the project has a potential to adversely affect an archeological resource, the PAR will state what additional measures are needed to address the potential effect. These measures may include preparation of an archeological research design and treatment plan, implementation of one of the Planning Department’s three standard archeological mitigation measures (archeological testing, monitoring, or accidental discovery), or other appropriate measures.

3. **Tribal Cultural Resources.** Tribal cultural resources (TCRs) are a class of resource established under the California Environmental Quality Act (CEQA) in 2015. TCRs are defined as a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American tribe, that is either included on or eligible for inclusion in the California Register of Historical Resources or a local historic register, or is a resource that the lead agency, at its discretion and supported by substantial evidence, determines is a TCR. Planning Department staff will review the proposed project to determine if it may cause an adverse effect to a TCR; this will occur in tandem with preliminary archeological review. No additional information is needed from the project sponsor at this time. Consultation with California Native American tribes regarding TCRs may be required at the request of the tribes. If staff determines that the proposed project may have a potential significant adverse impact on a TCR, mitigation measures will be identified and required. Mitigation measures may include avoidance, protection, or preservation of the TCR and development of interpretation and public education and artistic programs.

4. **Transportation.** Based on the PPA submittal, a transportation impact study is not anticipated to be required; an official determination will be made subsequent to submittal of the EEA.
If further analysis is necessary, the Planning Department requires that a consultant listed in the Planning Department’s Transportation Consultant Pool prepare a Transportation Impact Study. You are required to pay additional fees for the study; please contact Virnaliza Byrd at (415) 575-9025 to arrange payment. Once you pay the fees, please contact Manoj Madhavan at (415) 575-9095 or manoj.madhavan@sfgov.org so that you can be provided with a list of three consultants from the pre-qualified Transportation Consultant Pool. Upon selection of a transportation consultant, the Department will assign a transportation planner who will direct the scope of the consultant-prepared study.

Additionally, the proposed project is located on a high injury corridor as mapped by Vision Zero. The Eastern Neighborhoods Plan designates Howard Street, between 6th Street and 7th Street, as an “area for improved pedestrian connections.” The plan recommends signalized mid-block crosswalks along Howard, and bulb-outs and refuge islands throughout the Plan Area. At this location, Howard Street is a one way street with three travel lanes and parking on both sides of the street. The proposed project would likely increase pedestrian volumes at this location. Increasing pedestrian volumes in this area before improvements recommended by the Plan are completed could negatively affect pedestrian safety.

Planning staff 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:

- Show proposed bicycle parking on plans and any proposed bicycle parking on-street.
- Clarify whether the existing use on the site is currently active, and, if so, describe the use, with particular attention to the transportation characteristics of the current use.
- Show existing and proposed curb cuts on plans, including dimensions.
- Clearly define the required loading spaces on the plans, and include dimensions.

5. **Noise.** *Eastern Neighborhoods PEIR Noise Mitigation Measure F-1: Construction Noise* addresses requirements related to the use of pile-driving. The project sponsor has indicated that the project would not involve pile driving. Therefore, *Noise Mitigation Measure F-1* would not apply to the proposed project.

*Eastern Neighborhoods PEIR Noise Mitigation Measure F-2: Construction Noise* requires that the project sponsor develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant when the environmental review of a development project determines that construction noise controls are necessary due to the nature of planned construction practices and sensitivity of proximate uses. This mitigation measure requires that a plan for such measures be submitted to DBI prior to commencing construction to ensure that maximum feasible noise attenuation will be achieved.

*Eastern Neighborhoods PEIR Noise Mitigation Measure F-4: Siting of Noise-Sensitive Uses* is intended to reduce potential conflicts between existing noise-generating uses and new sensitive receptors. This measure would apply to the proposed project because the project includes a noise-sensitive use.
(residences). *Noise Mitigation Measure F-4* requires that the project sponsor conduct a detailed analysis of noise reduction requirements for new development including noise-sensitive uses located along streets with noise levels above 60 dBA (Ldn). The analysis must demonstrate with reasonable certainty that the California Noise Insulation Standards in Title 24 of the California Code of Regulations can be met.

*Eastern Neighborhoods PEIR Noise Mitigation Measure F-5: Siting of Noise-Generating Uses* would not apply to the proposed project because the project would not include commercial, industrial, or other uses that would be expected to generate noise levels in excess of ambient noise, either short term, at nighttime, or as a 24-hour average, in the project site vicinity.

Finally, *Eastern Neighborhoods PEIR Noise Mitigation Measure F-6: Open Space in Noisy Environments* would apply to the proposed project because it includes new development of a noise-sensitive use. This mitigation measure requires that open space required under the Planning Code be protected from existing ambient noise levels. Implementation of this measure could involve, among other things, site design that uses the building itself to shield on-site open space from the greatest noise sources, construction of noise barriers between noise sources and open space, and appropriate use of both common and private open space in multi-family dwellings, and implementation would also be undertaken consistent with other principles or urban design.

6. **Air Quality.** The proposed project at eight dwelling units is below the Bay Area Air Quality Management District’s (BAAQMD) construction and operational screening levels for criteria air pollutants.\(^5\) Therefore, an analysis of the project’s criteria air pollutant emissions is likely to be required.

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 San Francisco Board of Supervisors approved the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008). The intent of the Ordinance is to reduce the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of on-site workers, minimize public nuisance complaints, and avoid orders to stop work by the Department of Building Inspection (DBI). Pursuant to the Construction Dust Ordinance, the proposed project would be required to comply with applicable dust control requirements outlined in the ordinance.

The project site is located within an Air Pollutant Exposure Zone, as mapped and defined by Health Code Article 38. The Air Pollutant Exposure Zone identifies areas with poor air quality based on an inventory and modeling assessment of air pollution, exposures, and health vulnerability from mobile, stationary, and area source emissions within San Francisco. The project proposes to construct new sensitive land uses (i.e., residences), which are subject to enhanced ventilation measures pursuant to Health Code Article 38. The project sponsor will be required to submit an Article 38 application to

\(^5\) BAAQMD, CEQA Air Quality Guidelines, May 2011, Chapter 3.
Department of Public Health (DPH) prior to the issuance of any environmental determination. Please provide a copy of the initial application with the EEA.⁶

Equipment exhaust measures during construction will likely also be required. Detailed information related to construction equipment, phasing and duration of each phase, and the amount (in cubic yards) of excavation shall be provided as part of the EEA. If the project would generate new sources of toxic air contaminants including, but not limited to, emissions from diesel generators or boilers, or any other stationary sources, the project would result in toxic air contaminants that may affect both on-site and off-site sensitive receptors and additional measures will likely be required to reduce stationary source emissions. Based on the information in the PPA application, the proposed project likely would not require a backup diesel generator due to the proposed height, but this will be confirmed at the time of the EEA submittal.

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.⁷ The project sponsor is required to submit the completed table regarding project compliance with the identified regulations and provide project-level details in the discussion column. This information will be reviewed by the environmental planner during the environmental review process to determine if the project would comply with San Francisco’s Greenhouse Gas Reduction Strategy. Projects that do not comply with an ordinance or regulation may be determined to be inconsistent with the Greenhouse Gas Reduction Strategy.

8. **Wind.** The proposed project would involve construction of a building over 80 feet in height. The project will therefore require a consultant-prepared wind analysis, which may include wind tunnel analysis if needed. The wind consultant will be required to prepare a proposed scope of work for review and approval by the Environmental Planning coordinator prior to proceeding with the analysis.

9. **Shadow.** The proposed project would result in construction of a building greater than 80 feet in height. A preliminary shadow fan analysis prepared by Planning Department staff indicates that the proposed project could not cast shadows on any nearby properties under the jurisdiction of the San Francisco Recreation and Park Department or any property subject to Section 295 of the Planning Code. No further analysis of impacts related to shadow would be required. However, an official determination would be made subsequent to the submittal of the EEA.

10. **Geology.** The project site is located within a Seismic Hazard Zone (Liquefaction Hazard Zone likely underlain by artificial fill). Any new construction on the site is therefore subject to a mandatory

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⁶ Refer to http://www.sfdph.org/dph/eh/Air/default.asp for more information.
Interdepartmental Project Review. A geotechnical study prepared by a qualified consultant must be submitted with the EEA. The study should address whether the site is subject to liquefaction, and should provide recommendations for any geotechnical concerns identified in the study. In general, compliance with the building codes would avoid the potential for significant impacts related to structural damage, ground subsidence, liquefaction, landslides, and surface settlement. To assist Planning Department staff in determining whether the project would result in environmental impacts related to geological hazards, it is recommended that you provide a copy of the geotechnical information with boring logs for the proposed project. This study will also help inform the Planning Department Archeologist of the project site’s subsurface geological conditions.

11. Hazardous Materials. The proposed project would be located on a site with previous industrial uses. Therefore, the project is subject to Article 22A of the Health Code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I ESA would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, soil and/or groundwater sampling and analysis, as well as remediation of any site contamination, may be required. These steps are required to be completed prior to the issuance of any building permit.

DPH requires that projects subject to the Maher Ordinance complete a Maher Application, available at: [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 EEA.

In addition, Eastern Neighborhoods EIR Hazardous Materials Mitigation Measure L-1: Hazardous Building Materials would be applicable to the proposed project. The mitigation measure requires that the project sponsor ensure that any equipment containing polychlorinated biphenyls (PCBs) or di(2-ethylhexyl) phthalate (DEPH), such as fluorescent light ballasts, and any fluorescent light tubes containing mercury be removed and properly disposed of in accordance with applicable federal, state, and local laws. In addition, any other hazardous materials identified, either before or during work, must be abated according to applicable federal, state, and local laws.

Because the existing building was constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the building. The Bay Area Air Quality Management District (BAAQMD) is responsible for regulating airborne pollutants including asbestos. Please contact BAAQMD for the requirements related to demolition of buildings with asbestos-containing materials. In addition, because of its age (constructed prior to 1978), lead paint may be found in the existing building. Please contact the San Francisco Department of Building Inspection (DBI) for requirements related to the demolition of buildings that may contain lead paint.

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

13. **Disclosure Report for Developers of Major City Projects.** The San Francisco Ethics Commission S.F. Camp. & Govt. Conduct Code § 3.520 et seq. requires developers to provide the public with information about donations that developers make to nonprofit organizations that may communicate with the City and County regarding major development projects. This report must be completed and filed by the developer of any “major project.” A major project is a real estate development project located in the City and County of San Francisco with estimated construction costs exceeding $1,000,000 where either: (1) The Planning Commission or any other local lead agency certifies an EIR for the project; or (2) The project relies on a program EIR and the Planning Department, Planning Commission, or any other local lead agency adopts any final environmental determination under CEQA. A final environmental determination includes: the issuance of a Community Plan Exemption (CPE); certification of a CPE/EIR; adoption of a CPE/Final Mitigated Negative Declaration; or a project approval by the Planning Commission that adopts CEQA Findings. (In instances where more than one of the preceding determinations occur, the filing requirement shall be triggered by the earliest such determination.) A major project does not include a residential development project with four or fewer dwelling units. The first (or initial) report must be filed within 30 days of the date the Planning Commission (or any other local lead agency) certifies the EIR for that project or, for a major project relying on a program EIR, within 30 days of the date that the Planning Department, Planning Commission, or any other local lead agency adopts a final environmental determination under CEQA. Please submit a Disclosure Report for Developers of Major City Projects to the San Francisco Ethics Commission. This form can be found at the Planning Department or online at http://www.sfethics.org.

**PLANNING DEPARTMENT APPROVALS:**

The project requires the following Planning Department approvals. These approvals may be reviewed in conjunction with the required environmental review, but may not be granted until after the required environmental review is completed.

1. **A Building Permit Application** is required for the demolition of the existing building on the subject property.

2. **A Building Permit Application** is required for the proposed new construction on the subject property.

3. **A Variance Application** is required for the location of proposed bicycle spaces, and open space.
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 under the “Permits & Zoning” tab. All registered neighborhood group mailing lists are available online at www.sfplanning.org under the “Resource Center” tab.

Neighborhood Notification Materials. This project is subject to neighborhood notification as required by Planning Code Section 312.

PRELIMINARY PROJECT COMMENTS:

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

1. Eastern Neighborhoods Area Plan. The subject property falls within the area covered by the Eastern Neighborhoods 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 the Plan with regards to policies that call for maximizing development potential and other design comments listed below. These comments discuss any items where more information is needed to assess conformity with either specific policies or Code standards or where the project requires minor modification to achieve consistency. The project sponsor is encouraged to read the full plan, which can be viewed at www.sf-planning.org/ftp/General_Plan/East_SoMa.htm

2. Density Maximization & Affordable Housing Provision. The site is located within the MUG zoning district with no limit on number of units allowed per lot. The proposed project includes only eight residential units in a total of 10,478 square feet of space. Given the need for more housing in the city and also according to the Housing Element Policy 1.1 & 1.2, the Department recommends taking advantage of the allowed density. The project is also short of 10 units which trigger Sections 415 of the Planning Code, requiring 15% of units to be Below Market Rate (BMR) units. Using an average density of 1000 square feet per unit, this would yield approximately 11 units, of which 1 or 2 would be required to be BMR units.

3. Open Space. Section 135 requires 80 square feet of useable open space for each dwelling unit. As the rear yard serves as private open space for one unit, the required common open space at the roof level is 560 square feet. The proposed plans show open space calculations on the roof; however, it does not appear to meet the minimum horizontal dimensions. Common areas for useable open space, such as the roof, shall not have any horizontal dimension less than 15 feet. Please revise plans to show the compliance with required open space minimum dimensions, or seek and justify an open space
variance. As the project is new construction, the Department recommends code-complying open space.

4. **Height.** Per Planning Code Section 260, please confirm the roof deck is at or below the required height limit for the 85-X Height and Bulk District.

   In addition, the horizontal area of proposed stair penthouses shall not cover more than 20 percent of the horizontal roof area, per Planning Code Section 260(b)(1). It appears the roof’s horizontal area is covered by more than 20 percent. Please provide calculations demonstrating compliance.

   Lastly, please be informed the height exemption for elevator penthouses shall be limited to the top 16 feet and limited to the footprint of the elevator shaft, regardless of the height limit of the building. The enclosed area between the elevator penthouse and the southern stair penthouse does not comply with the code, as it is useable floor area.

5. **Rear Projections.** Per Planning Code Section 136(c)(2)(F), for the rear bay windows, the minimum horizontal separation between bay windows, between balconies, and between bay windows and balconies shall be two feet at the line establishing the required open area, and shall be increased in proportion to the distance from such line by means of 135-degree angles drawn outward from the ends of such two-foot dimension, reaching a minimum of eight feet along a line parallel to and at a distance of three feet from the line establishing the required open area. Please revise plans to show compliance with Planning Code Section 136(c)(2) and/or 136(c)(3) regarding separation, glazing and depth requirements of permitted rear projections.

6. **Bicycle Parking.** Planning Code Section 155.1(b)(1)(A) requires the proposed project to provide Class 1 bicycle parking on the ground floor within 100 feet of the major entrance to the lobby. Per Section 155.1(b)(1)(C), if unique limitations prevent bicycle spaces on the ground floor, they may be located one floor above or below the ground floor. As proposed, the bicycle parking spaces do not comply with the code requirements. On a subsequent submission please revise plans to have code-complying bicycle parking, or seek and justify a variance for the location of bicycle spaces.

7. **Shadow Analysis.** Planning Code Section 295 requires that a shadow analysis must be performed to determine whether the project has the potential to cast shadow on properties under the jurisdiction of the San Francisco Recreation and Park Commission. Department staff has prepared a shadow fan that indicates the project will not cast new shadow on any property under the jurisdiction of the Recreation and Parks Department.

8. **Bird Safety.** Standards for Bird Safe Buildings. Planning Code Section 139 outlines bird-safe standards for new construction to reduce bird mortality from circumstances that are known to pose a high risk to birds and are considered to be "bird hazards." Feature-related hazards may create increased risk to birds and need to be mitigated. Any feature-related hazards, such as free-standing glass walls, wind barriers, or balconies must have broken glazed segments 24 square feet or smaller in size. Please review the standards and indicate the method of window treatments to comply with the requirements where applicable.
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9. **Street trees.** The Department of Public works requires the planting of Street Trees pursuant to Article 16, Section 805(a) and (d) and 806 (d). Generally, one street tree for every 20 feet of frontage for new construction will be required. You may contact Carla Short at the Department of Public Works for additional information (carla.short@sfdpw.org). You may also view the code requirements at the following link: http://www.amlegal.com/nxt/gateway.dll/California/publicworks/article16urbanforestryordinance?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$anc=JD_806

10. **Eastern Neighborhoods Impact Fees.** This project is subject to the applicable fees outlined in Section 423. The exact fee is determined by the final area of each use subject to the Fee and rate in effect at the time of building permit issuance. Fees would be assessed at a Tier 3 rate.

11. **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/. Applicants may contact stormwaterreview@sfwater.org for assistance.

**PRELIMINARY DESIGN COMMENTS:**

The project site is located within an identified historic district; therefore, the proposed project is subject to further design review by the Planning Department’s Historic Preservation staff. Please refer to the Environmental Planning Review – Historic Resources section of the Preliminary Project Assessment for further information. The following comments address preliminary design issues that may substantially affect the proposed project:

1. **Street Frontage.** The intention of the 85’ height limit is to provide for eight stories, anticipating and accommodating a ground story with generous high-ceilings for commercial or uses. The Planning Department recommends the provision of retail at the ground floor due to the context of Howard Street. This would require the compliance with the ground floor height requirements of 14’ for MUG zoning. Even if the project excludes commercial uses, the Department recommends consistency with the design intent of the zoning and the 85’ height district, and should provide a generous and inviting space of approximately 14’ in height for lobby or other non-retail uses. In any of these scenarios, this suggests a reduction in the number of floors within the overall building height.

2. **Architecture.** The Planning Department appreciates the proportions of the structural frame and recessed fenestration as a scale-defining feature that references a building pattern in the district. The Planning Department recommends adding an intermediate scale defining feature to establish a base that references the existing adjacent buildings, and another which helps modulate the overall height and scale of the proposed building. It is envisioned that this could be accomplished through small scale massing shifts and significantly visible detailing that is additive to the architecture. Additionally, the side walls which will be likely visible for the foreseeable future, should exhibit a similar scalar reference. Please work with Preservation staff to conform to Historic District standards.
The expression of the concrete structure at the base could be enhanced with human-scale detailing, such as board formed concrete.

Preliminary Project Assessment
Case No. 2015.010371PPA
1082 Howard Street

PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of 18 months. An Environmental Evaluation and a Building Permit Application as listed above, must be submitted no later than May, 10, 2017. Otherwise, this determination is considered expired and a new Preliminary Project Assessment is required. Such applications and plans must be generally consistent with those found in this Preliminary Project Assessment.

Enclosure: Neighborhood Group Mailing List
Interdepartmental Project Review Application
Flood Notification: Planning Bulletin
SFPUC Recycled Water Information Sheet

cc: Andery Libov, Property Owner
    Jeffrey Speirs, Current Planning
    Christopher Epiritu, Environmental Planning
    Kimia Haddadan, 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 (planning.webmaster@sfgov.org)
Interdepartmental Project Reviews are mandatory for new construction projects that propose buildings eight stories or more and new construction on parcels identified by the State of California Department of Conservation, Division of Mines and Geology as Seismic Hazard Zones in the City and County of San Francisco. Projects identified as such, must request and participate in an interdepartmental project review prior to any application that requires a public hearing before the Planning Commission or new construction building permit.

Project Sponsors may elect to request an interdepartmental review for any project at any time, however, it is strongly recommended that the request is made prior to the submittal of the abovereferenced applications.

The Planning Department acts as the lead agency in collaboration with the Department of Building Inspection (DBI); the Department of Public Works (DPW); and the San Francisco Fire Department (SFFD). Staff from each of these disciplines will attend your meeting.

Interdepartmental Project Review fees:
1. $1,164 for five or fewer residential units and all affordable housing projects.
2. $1,702 for all other projects.

Please note that $394 of these fees is non-refundable. If your project falls under the second type of fee, and you cancel your meeting, the difference will be refunded to you.

To avoid delays in scheduling your meeting, provide all information requested on this form and submit your request with a check in the appropriate amount payable to the San Francisco Planning Department. Requests may be mailed or delivered to San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103-2414. Those wishing more specific or more detailed information may contact the Project Review Meeting Coordinator at (415) 575-9091.

Please note: All returned checks are subject to a $50.00 bank fee.

Interdepartmental Project Reviews are scheduled no sooner than two weeks from the receipt of the request form and check.
Submittal requirements:

Please submit four (4) copies/sets of all information for distribution to each department/agency.

All projects subject to the mandatory Interdepartmental Project Review shall be required to submit the following minimum information in addition to their request form:

1. Site Survey with topography lines;
2. Floor Plans with occupancy and/or use labeled of existing and proposed;
3. Existing and proposed elevations;
4. Roof Plan; and
5. Pictures of the subject property and street frontages.

Planned unit developments or projects with an acre or more of land area shall be required to submit the following additional information:

1. Existing and proposed street names and widths;
2. Location of any existing train tracks; and
3. Location of any existing and proposed easements.

In order for the Interdepartmental Project Review to be most effective and beneficial to you, it is strongly recommended that any issues, concerns and/or specific questions are submitted with this request directed to each discipline.
INTERDEPARTMENTAL PROJECT REVIEW APPLICATION FORM

APPLICATION DATE: _____________________________________________________________

PROJECT CONTACT:
Name __________________________________ Phone No. (_____)____________________
Address ___________________________________________ FAX No. (_____)________________
Owner________________________________________________________________________

PROJECT INFORMATION:
Address________________________________________________________________________

How many units does the subject property have? ________________________________

Assessor’s Block/Lot(s) __________________ Zoning District ______________________

Height and Bulk Districts __________________ Located within Geologic Hazard Zone? Y ☐ N ☐

PROJECT DESCRIPTION / PURPOSE OF MEETING/SPECIFIC QUESTIONS:
(Use attachments if necessary)
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

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<th>Land Use Type</th>
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<th>Proposed</th>
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<td>Number of Hotel Rooms</td>
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<td>Number of Parking Spaces</td>
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<td>Number of Stories</td>
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Previously contacted staff ________________________________________________________

Will this project be publicly funded? (specify) _______________________________________

(Please submit four (4) copies/sets of the Application Form, Floor Plans, Pictures, etc.)
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.
Re: SFPUC Urban Watershed Management Program (UWMP)
Stormwater Requirements

Dear Project Proponent,

Your project may be subject to meeting requirements of the 2010 San Francisco Stormwater Management Ordinance and the San Francisco Stormwater Design Guidelines (Guidelines). The project parameter that triggers compliance with the Guidelines is:

- Projects disturbing 5,000 square feet or more of ground surface are subject to the Stormwater Management Ordinance and must therefore meet the performance measures set within the Guidelines.

If your project triggers the Ordinance your project must:

- Determine if your project is located in the area served by the combined sewer or the area served by the separate sewer and meet the applicable performance measure:
  
  o Combined Sewer Areas:
    - For sites with existing imperviousness of less than or equal to 50%, stormwater runoff rate and volume shall not exceed pre-development conditions for the 1- and 2-year 24-hour design storm.
    - For sites with existing imperviousness of greater than 50%, stormwater runoff rate and volume shall be decreased by 25% from the 2-year 24-hour design storm.
    - (Equivalent to LEED Sustainable Sites Credit 6.1).

  o Separate Sewer Areas:
    - Capture and treat the rainfall from a design storm of 0.75 inches.
    - (Equivalent to LEED Sustainable Sites Credit 6.2).

- Develop a Stormwater Control Plan in accordance with the Guidelines and submit it for review and approval to the UWMP prior to receiving a building permit; and

- Develop an operation and maintenance plan for all proposed stormwater controls and submit it as part of the Stormwater Control Plan.

Stormwater requirements can be met using Low Impact Design (LID) or other green infrastructure approaches. LID approaches use stormwater management solutions that promote the use of ecological and landscape-based systems that mimic pre-development drainage patterns and hydrologic processes by increasing retention, detention, infiltration, and treatment of stormwater at its source.
The necessary documents can be found online at:

- Stormwater Management Ordinance:

- Stormwater Design Guidelines (Guidelines) and Appendixes:
  http://sfwater.org/sdg

- Instructions for completing a Stormwater Control Plan: Refer to Guidelines, Appendix C.

- Municipal separate stormwater sewer system (MS4) and Combined Sewer System Boundary Map: Refer to Guidelines, p.10

Upon receipt of this letter please contact the SFPUC Urban Watershed Management Program (UWMP) to confirm specific Guideline requirements for your project.

Project Reviewer
Urban Watershed Management Program
stormwaterreview@sfwater.org

The UWMP staff looks forward to helping you achieve stormwater management compliance and moving your project forward.

Sincerely,

UWMP Project Review Team

San Francisco Public Utilities Commission
Wastewater Enterprise
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 (except condominium conversions) 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.

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 required for each water line.

Required Backflow Prevention
- 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 preventers must be approved by the SFPUC’s Water Quality Bureau.

The backflow preventer for domestic water plumbing inside the building, and 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 – piping described in Chapter 3, Appendix J of 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 and Technical Assistance
San Francisco Public Utilities Commission
Water Resources Planning
(415) 554-3271

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

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

New Service Line Permits
San Francisco Public Utilities Commission
Customer Service Bureau
(415) 551-3000

9/09
NOTE:
1. ALL BACKFLOW PREVENTERS MUST 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.