



SAN FRANCISCO PLANNING DEPARTMENT

Letter of Determination

September 19, 2016

Larry Badiner
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Name:	GM Cruise, LLC
Site Address:	1201 Bryant Street/530 10 th Street
Assessor's Block/Lot	3528 / 001
Zoning District:	SALI (Service/Arts/Light Industrial District)
Staff Contact:	Ming Yeung, (415) 575-9183 or ming.yeung@sfgov.org
Record No.:	2016-010221ZAD

Dear Mr. Badiner:

This letter is in response to your request for a Letter of Determination regarding the property at 1201 Bryant Street/530 10th Street. The subject property is located in the SALI (Service/Arts/Light Industrial) Zoning District, Western SoMa Special Use District and 40-X Height and Bulk District. The request seeks a determination as to whether GM Cruise, LLC is a Laboratory use as defined in the Planning Code.

Background

As noted in your letter, GM Cruise is an automobile engineering company whose mission is to develop autonomous cars. GM Cruise proposes to use of the space at 1201 Bryant Street to develop, prototype, and test its autonomous driving platform and automobile componentry. The functions that would occur at the property are described in your letter as:

- *Vehicle Maintenance and Control Installation* – Installation of controls (buttons, sensors) and electronic hardware (computers in trunk, wiring throughout car). Development and testing of new car configurations and sensors and equipment. Maintenance of the test fleet.
- *Machine Shop and 3-D Printing* – Metal working equipment such as saws, grinders, milling machines and drill presses. Plastic and composite 3-D printers for prototypes.
- *Test Production Space* – Automobile parking and staging, cars are disassembled and modifications added (sensors, racks on top, wiring run through cars, computers in the back, etc.)
- *Showroom* – Automobile display and parking.
- *Engineering and Development Lab* – Collaborative and open workspace for engineers to conduct various development tasks for driverless vehicles, such as using iterative

measurements of sensor readings (like acceleration, deceleration, and turning) to calibrate sensors and fidelity to vehicle readings and actuation; testing and using data from various sensors and combinations of sensors, in various placements and layouts, to ensure autonomous vehicles correctly perceive and track important road objects; developing vehicle behaviors (e.g. turn left, stop, change lanes) based on given set of information (e.g., stop sign ahead, car to your right, speed limit 25 mph); using machine learning to train computers to recognize various elements of images; and integrating readings from various sensors on vehicle and comparing them to existing data from the vehicle's base map so the vehicle can tell where it is.

In a follow-up email, you clarified that the proposed "showroom" would involve displaying cars that are being developed and that the cars would only be visible through the window and inaccessible by the public. No sales would occur on the site. In addition, your submittal includes a chart indicating that a limited amount of accessory office is also proposed for the site.

Laboratory/Accessory Office

Per Planning Code Section 890.52, Laboratory, not including Life Science Laboratory, is a permitted use in the SALI district. Section 890.52 defines Laboratory as follows:

Laboratory shall mean space within any structure intended or primarily suitable for scientific research. The space requirements of uses within this category include specialized facilities and/or built accommodations that distinguish the space from office uses (as defined in Section 890.70), light manufacturing (as defined in Section 890.54(a)), or heavy manufacturing (including uses listed in 226(g) through 226(w)). Examples of laboratories include the following:

- (a) Chemistry, biochemistry, or analytical laboratory;*
- (b) Engineering laboratory;*
- (c) Development laboratory;*
- (d) Biological laboratories including those classified by the Centers for Disease Control (CDC) and National Institutes of Health (NIH) as Biosafety level 1, Biosafety level 2, or Biosafety level 3;*
- (e) Animal facility or vivarium, including laboratories classified by the CDC/NIH as Animal Biosafety level 1, Animal Biosafety level 2, or Animal Biosafety level 3;*
- (f) Support laboratory;*
- (g) Quality assurance/Quality control laboratory;*
- (h) Core laboratory.*

Office use is not a permitted principal use in the SALI district, however, Planning Code Section 204 allows office as an accessory use as follows:

Subject to the limitations set forth in this Code, and especially as specified in Sections 204.1 through 204.5, a related minor use that is either (a) necessary to the operation or enjoyment of a

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lawful principal use or conditional use; or (b) appropriate, incidental, and subordinate to any such use; and (c) in the case of Internet Services Exchange as defined in Section 102, which use does not exceed 25,000 gross square feet of floor area or use more than two megawatts of back-up power generators, shall be permitted as an accessory use when located on the same lot...

Determination

Based upon the information provided in your request, it is my determination that GM Cruise is a Laboratory use, and more specifically, an engineering laboratory use. As such, GM Cruise would be a permitted use at 1201 Bryant Street/530 10th Street. Future submittals for authorization at this site should include a detailed chart and breakdown of the proposed office use at the site to ensure that this use is accessory to the principal Laboratory use.

Please note that a Letter of Determination is a determination regarding the classification of uses and interpretation and applicability of the provisions of the Planning Code. This Letter of Determination is not a permit to commence any work or change occupancy. Permits from appropriate Departments must be secured before work is started or occupancy is changed.

APPEAL: If you believe this determination represents an error in interpretation of the Planning Code or abuse in discretion by the Zoning Administrator, an appeal may be filed with the Board of Appeals within 15 days of the date of this letter. For information regarding the appeals process, please contact the Board of Appeals located at 1650 Mission Street, Room 304, San Francisco, or call (415) 575-6880.

Sincerely,



Scott F. Sanchez
Zoning Administrator

cc: Property Owner
Neighborhood Groups
BBN Holder (if any)
Ming Yeung, Planner