



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: March 26, 2014
TO: Peter Aceworth, Kink.com
FROM: Josh Switzky, Planning Department
RE: PPA Case No. 2014.0154U for 1800 Mission Street

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Menaka Mohan, at (415) 575-9141 or menaka.mohan@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.



Josh Switzky, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: March 26, 2014
Case No.: **2014.0154U**
Project Address: 1800 Mission Street
Block/Lot: 3457/001
Zoning: UMU (Urban Mixed-Use) Zoning District
45-X/68-X Height and Bulk District
Landmark No. 108
Area Plan: Mission Area Plan
Project Sponsor: Peter Acworth, Armory Studios LLC
415-385-2436
Staff Contact: Menaka Mohan – [415-575-9141]
menaka.mohan@sfgov.org

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

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 proposal is a change of use from movie and video production (PDR) to office use or flexible space that could accommodate traditional office tenants or support an arts venue. Currently, the Armory is used for movie and video production, which includes accessory office in support of that use. The Armory has also been used for individual special events, art activities, temporary permitted uses and gatherings. The proposal does not include a change in the exterior building envelope or an increase in floor area, or any off-street parking. The proposed uses are described as:

Table 1: Existing and Proposed Uses

Floor Level	Square Footage	Existing Use	Proposed Use
Basement	67,000	Arts (Film Production) + Office (1,144 sf)	Office
1st Floor (Administration Building)	20,467	Accessory Office	Office
Drill Court	39,000	Public Assembly restricted to Arts Use. Temporary Use Authorization (TUA) for Other Assembly Uses.	Public Assembly for Various Uses: Spectator Sports, Arts, or Nighttime Entertainment
2nd Floor	15,502	Production + Accessory Office (1,348 sf)	Office
3rd Floor	20,467	Accessory Office	Office
4th Floor	20,467	Production + Accessory Office (735 sf)	Public Assembly (Nighttime Entertainment) & Office
Total	182,903		

The proposed project would result in a maximum of 143,903 sq ft of new office use.

In addition, the proposed project submittal includes exterior work that was not previously identified in Historic Preservation Commission Motion No. 0154 (Case No. 2011.1104A). This work includes: new sidewalk planters, cleaning of the exterior brick walls of efflorescence and paint, repair of the parapet along Julian Avenue, and restoration of the main doors at 333 14th Avenue.

ENVIRONMENTAL REVIEW:

In compliance with the California Environmental Quality Act (CEQA), the environmental review process must be completed before any project approval may be granted. This review may be done in conjunction with the required approvals listed below. In order to begin formal environmental review, please submit an Environmental Evaluation Application for the full scope of the project (demolition and construction). Environmental Evaluation 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 under the "Publications" tab. See "Environmental Applications" on page 2 of the current Fee Schedule for calculation of environmental application fees.¹

Based on the preliminary review of the proposed project, the project could be eligible for a Class 1 categorical exemption from environmental review under CEQA Guidelines Section 15301. Class 1 allows

¹ San Francisco Planning Department. *Schedule for Application Fees*. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=513>

for an exemption for minor alteration of existing facilities from the provisions of CEQA. If the total occupancy of the proposed uses would not exceed the equivalent total occupancy of the existing uses plus an addition to the former uses, as exempt under CEQA Guidelines Section 15301(e) and if the project would not result in a significant impact on the environment, the project could be eligible for a Class 1 exemption. If a Class 1 exemption is appropriate, Environmental Planning staff will prepare a certificate of exemption.

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. The proposed project is located within the *Eastern Neighborhoods Rezoning and Area Plans*,² which was evaluated in *Eastern Neighborhoods Rezoning and Area Plans Programmatic Final Environmental Impact Report ("Eastern Neighborhoods FEIR")*, which was certified in 2008.³ Because the proposed project is consistent with the development density identified in the area plan, if it is determined that the project would not qualify for a Class 1 categorical exemption, the project is likely to qualify for a Community Plan Exemption (CPE) under the *Eastern Neighborhoods Rezoning and Area Plans*.

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

- (i) **CPE Only.** All potentially significant project-specific and cumulatively considerable environmental impacts are fully consistent with significant impacts identified in the *Eastern Neighborhoods FEIR*, 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 FEIR* 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 \$13,339); (b) the CPE certificate fee (currently \$7,402); and (c) a proportionate share fee for recovery for costs incurred by the Planning Department for preparation of the *Eastern Neighborhoods FEIR*.
- (ii) **CPE + 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 FEIR*, 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. In addition, a supporting CPE certificate is prepared to address all other impacts that were encompassed by the *Eastern Neighborhoods FEIR*, with all pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods FEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,339); (b) the standard environmental evaluation fee (which is based on construction value); and (c) a proportionate share fee for recovery for costs incurred by the Planning Department for preparation of the *Eastern Neighborhoods FEIR*.

² San Francisco Planning Department. *Eastern Neighborhoods Rezoning and Area Plans*. Available online at: <http://www.sf-planning.org/index.aspx?page=1893>. Accessed February 21, 2014.

³ Available for review on the Planning Department's Area Plan EIRs web page: <http://www.sf-planning.org/index.aspx?page=1893>.

- (iii) **CPE + 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 certificate is prepared to address all other impacts that were encompassed by the *Eastern Neighborhoods FEIR*, with all pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods FEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,339); (b) the standard environmental evaluation fee (which is based on construction value); (c) one-half of the standard EIR fee (which is also based on construction value); and (d) a proportionate share fee for recovery for costs incurred by the Planning Department for preparation of the *Eastern Neighborhoods FEIR*.

The following environmental issues would likely be addressed as part of the project's environmental review based on our preliminary review of the proposed project as it is described in the Preliminary Project Assessment (PPA) submittal dated January 21, 2014:

1. **Land Use.** The *Eastern Neighborhoods FEIR* identified an unavoidable significant land use impact due to the cumulative loss of Production, Distribution and Repair (PDR). The proposed project involves modification or reduction of the existing film production use, which is considered a PDR use. Therefore, the proposed project would contribute to this impact. As part of the environmental review for the proposed project, the project's potential impact with respect to the loss of PDR would be evaluated.
2. **Historic Architectural Resources.** Per Article 10 of the San Francisco Planning Code, 1800 Mission Street (also known as the Mission Armory or National Guard Armory and Arsenal) is designated as City Landmark No. 108; therefore, the subject property is considered to be a historic resource for the purposes of CEQA. The Project Sponsor has indicated that the proposed project would not involve any new exterior additions; however, the project description does include preservation and repair work to the exterior as well as limited interior work.⁴ Advanced historic resource review is not likely; however, Department Preservation staff will review work to interior character-defining features. This review work may be administratively addressed without the need for any additional consultant reports.
3. **Archeological Resources.** The Project Sponsor has indicated that the proposed project would not entail excavation or soil-disturbing activities.⁵ Based on this, archeological resources review would not likely be required for the proposed project.
4. **Transportation and Circulation.** The Project Sponsor has indicated that the proposed project would involve a change of use as shown in Table 1, found in the project description.⁶

⁴ Andrew J. Junius, Reuben, Junius & Rose. *Email to Kei Zushi, San Francisco Planning Department, 1800 Mission Street, February 20, 2014.* This email is available for review as part of Case File No. 2014.0154U at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

⁵ Ibid.

The Project Sponsor indicates that the proposed arts activities, nighttime entertainment, and other performance or recreational uses would not occur during the a.m. or p.m. peak hours (i.e., between 7:00 a.m. and 9:00 a.m. or 4:00 p.m. and 6:00 p.m. on weekdays).⁷

Based on this, a Transportation Impact Study (TIS) would likely be required for the proposed project. A formal determination as to whether a TIS is required will be made after submittal of the Environmental Evaluation Application. If a TIS is required, the Planning Department will provide additional guidance related to the process for selecting a transportation consultant and assist in the development of the scope of work for the analysis. The consultant must be selected from a list of three transportation consultants from the Planning Department's transportation consultant file provided by the Planning Department during the environmental review process.⁸

At the time of filing of the Environmental Evaluation Application, please ensure that the project description responds to the following comments:

- a. Regarding the proposed public assembly uses (spectator sports, arts, and nighttime entertainment); clarify the nature of these uses. Provide any traffic counts (e.g., average daily trips) that may have been collected for these uses, if available. Please also provide the information regarding the hours of such uses, the number of employees and participants expected, and how often each of these uses occurs.
5. **Noise.** *Eastern Neighborhoods FEIR Noise Mitigation Measure F-1: Construction Noise*, addressing requirements related to the use of pile-driving, would not apply to the proposed project because pile-driving would not be utilized as part of the project.

Eastern Neighborhoods FEIR Noise Mitigation Measure F-2: Construction Noise might apply to the proposed project. This mitigation measure requires that the Planning Director require 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.

Based on the *Eastern Neighborhoods FEIR*, the project site is located in an area where traffic-related noise exceeds 60 dBA L_{dn} (a day-night averaged sound level). *Eastern Neighborhoods FEIR Noise Mitigation Measure F-3: Interior Noise Levels* requires that the Project Sponsor conduct a detail analysis

⁶ Andrew J. Junius, Reuben, Junius & Rose. *Email to Kei Zushi, San Francisco Planning Department, 1800 Mission – PPA clarification*, February 20, 2014. This email is available for review as part of Case File No. 2014.0154U at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

⁷ Ibid.

⁸ San Francisco Planning Department. *Consultant Resources, Transportation Consultant Pool*. Available online at: <http://www.sf-planning.org/index.aspx?page=1886>

of noise reduction requirements for new development including noise-sensitive uses located along streets with noise levels above 60 dBA (L_{dn}), where such development is not already subject to the California Noise Insulation Standards in Title 24 of the California Code of Regulations. *Noise Mitigation Measure F-3* would not apply to the proposed project as the project would not include any noise-sensitive uses (e.g., dwelling units, schools, children's day care centers, parks and playgrounds, hospitals, and nursing and convalescent homes).

Eastern Neighborhoods FEIR 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 not apply to the proposed project because the project would not include any noise-sensitive uses.

Eastern Neighborhoods FEIR Noise Mitigation Measure F-5: Siting of Noise-Generating Uses may apply to the proposed project depending on the nature and scope of the proposed use(s). *Noise Mitigation Measure F-5* requires that the Planning Department require the preparation of a noise analysis for new development including 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, to reduce potential conflicts between existing noise-generating uses and new sensitive receptors. Please clarify whether any of the proposed uses would generate noise levels in excess of ambient noise, either short term, at nighttime, or as a 24-hour average, in the project site vicinity at the time of Environmental Evaluation Application.

Finally, *Eastern Neighborhoods FEIR Noise Mitigation Measure F-6: Open Space in Noisy Environments* would not apply to the proposed project as it does not include any noise-sensitive uses. This mitigation measure requires that open space required under the Planning Code be protected from existing ambient noise levels.

6. Air Quality.

Criteria Air Pollutants

The proposed project involves a change of use in an existing, approximately 182,900-sf building. The proposed uses include office and public assembly for various uses (spectator sports, arts, and nighttime entertainment). Although the Planning Department is requesting further details of the existing and proposed uses as part of the Environmental Evaluation Application, based on the information already provided, the proposed project would likely not exceed the Bay Area Air Quality Management District's (BAAQMD) construction or operational screening level for criteria air pollutants.⁹ Therefore, an analysis of the project's criteria air pollutant emissions is not likely to be required for the proposed project.

A formal determination as to whether an analysis of the project's criteria air pollutant emissions is required will be made after submittal of the Environmental Evaluation Application. Details of each of

⁹ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3.

the existing and proposed uses (e.g., the hours of such uses, the number of employees and participants expected, and how often each of these uses occurs) shall be provided along with the Environmental Evaluation Application.

Local Health Risks and Hazards

In addition, San Francisco has partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the "Air Pollutant Exposure Zone," were identified. Land use projects within the Air Pollutant Exposure Zone require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations. Although the proposed project is not within an Air Pollutant Exposure Zone, improvement measures may be recommended for consideration by City decision makers such as exhaust measures during construction.

If the project would generate new sources of toxic air contaminants including, but not limited to: diesel generators or boilers, or any other stationary sources, the project would result in toxic air contaminants that may affect both on-site and off-site sensitive receptors. If the proposed project generates new sources of toxic air contaminants, additional measures will likely be necessary to reduce its emissions. Detailed information related to any proposed stationary sources shall be provided with the Environmental Evaluation Application.

7. **Greenhouse Gases.** Potential environmental effects related to greenhouse gas (GHG) emissions from the proposed project need to be addressed in a project's environmental evaluation. The Project Sponsor would be required to submit a completed GHG Compliance Checklist Table 1 for Private Development Projects¹⁰ demonstrating that the project is in 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.¹¹ Projects that do not comply with a GHG-related regulation may be determined to be inconsistent with San Francisco's Greenhouse Gas Reduction Strategy.
8. **Hazardous Materials.** The Project Sponsor has indicated that the proposed project would not involve excavation or soil disturbing activity.¹²

Eastern Neighborhoods FEIR 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 PCBs or DEPH, such as fluorescent light ballasts, and

¹⁰ San Francisco Planning Department. *Consultant Resources. Greenhouse Gas Compliance Checklist for Private Development Projects.* Available online at: <http://www.sf-planning.org/index.aspx?page=1886>

¹¹ City and County of San Francisco. *Strategies to Address Greenhouse Gas Emissions.* Available online at: http://sfmea.sfplanning.org/GHG_Reduction_Strategy.pdf

¹² Nina Otis, Project Sponsor. *Email to Kei Zushi, San Francisco Planning Department, 1800 Mission Street, February 20, 2014.* This email is available for review as part of Case File No. 2014.0154U at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

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, shall be abated according to applicable federal, state, and local laws.

Because the existing building on the project site was constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the building. BAAQMD is responsible for regulating airborne pollutants including asbestos. Please contact BAAQMD for the requirements related to internal remodel of buildings that may contain asbestos-containing materials. In addition, because of their age, lead paint may be found in the existing building. Please contact DBI for requirements related to internal remodel of buildings that may contain lead paint.

9. **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. Please be prepared to provide these mailing labels upon request during the environmental review process.

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 **Certificate of Appropriateness** from the Historic Preservation Commission (HPC) is required per Planning Code Section 1006. Since the subject property is designated as Landmark No. 108, the HPC will review and approve the exterior preservation and repair work.
2. **Review and Comment** from the Historic Preservation Commission is required per Planning Code Section 803.9(c). To allow for office use on all floors, the HPC would review the proposed project and forward their determination to the Zoning Administrator, who would determine if allowing office use would enhance the feasibility of preserving the building.
3. An **Office Allocation** from the Planning Commission is required per Planning Code Section 321, since the project would seek a change of use to office that is more than 25,000 gross square feet.
4. A **Building Permit Application** is required for the proposed alterations to the exterior and interior of the subject property.

All applications are available in the Planning Department Reception at 1650 Mission Street Suite 400, at the Planning Information Center (PIC) at 1660 Mission Street, or online at www.sfplanning.org. Building Permit Applications are available at the Department of Building Inspection at 1660 Mission Street.

NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

Project Sponsors are encouraged 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 Meeting 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.

PRELIMINARY PROJECT COMMENTS:

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

1. **Land Use-Eastern Neighborhoods, Mission Area Plan.** The Mission Area Plan of the Eastern Neighborhood Plan promotes a wide range of uses to create a livable and vibrant neighborhood. The project site is located in the UMU district, which is designed to promote a vibrant mix of uses while maintaining the characteristics of this formerly industrially-zoned area. It is also intended to serve as a buffer between residential districts and PDR districts in the Eastern Neighborhoods. The project meets the following objectives of the Mission Area Plan: Objective 1.1, Objective 4.3, and Objective 7.3. Further information about the Mission Area Plan can be found here:

<http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=2321>

The project proposes more office than UMU zoning permits. The applicant has proposed this office space under the provision of Code Section 809.3, which provides an avenue for certain historic buildings to be converted to any use provided that such use is necessary to provide for feasible upkeep of the building. Given the need for additional space in the City for PDR uses, the particular layout of this building, and the fact that the current use has done a commendable job in maintaining the existing property, the Planning Department recommends modifying the proposal to reduce the extent of the proposed office conversion by keeping the basement (67,000 sq. ft.) in PDR use. The lack of exposure to light and air in the basement makes it less than ideal for office use. The project is also not proposing any additional parking and recognizes the surrounding transit-rich neighborhood and unique resource in the Mission District. The project sponsor may also want to consider reserving some of the office space for local non-profit organizations given then shortage of affordable office space in the City.

1. **Gross Floor Area:** Planning Code Section 102.9 provides a definition of gross floor area. Please ensure that the proposed area calculations for the proposed project meet the Planning Code definition for gross floor area. Please provide a floor plan diagram demonstrating the areas included and excluded with the gross floor area.
2. **Floor Area Ratio:** Planning Code Section 124 outlines the requirements for floor area ratio (FAR). The project site would be subject to a FAR of 5.0 to 1 for the portion of the site located within the 68-X

Height and Bulk District, and a FAR of 3.0 to 1 for the portion of the site located within the 45-X Height and Bulk District. The proposed project appears to meet this requirement with the proposed envelope, which measures approximately 179,000 sq ft.

- Open Space:** Planning Code Section 135.3 outlines an open space requirement for non-residential uses within Eastern Neighborhoods Mixed Use Zoning Districts. For office use, 1 sq ft of usable open space is required for 50 sq ft of occupied floor area of new, converted or added square footage. Therefore, 2,878 sq ft of non-residential open space is required for the office use. For entertainment use, 1 sq ft of useable open space is required for 250 sq ft of occupied floor area of new, converted or added square footage. Therefore, 140 sq ft of non-residential open space is required for the entertainment use.

Please specify how the project will meet this requirement. Otherwise, the project may elect to satisfy the open space requirement through the payment of an in-lieu fee, pursuant to Planning Code Section 426. Per Planning Code Section 307(h), the determination for payment on an in-lieu fee may be administratively executed by the Zoning Administrator.

- Bettors Streets Plan-Streetscape Plan and Improvements.** Planning Code Section 138.1(2)(i) outlines the requirements for streetscape and pedestrian improvement for projects located on a lot that is greater than ½-acre in total area and encompasses new construction. The proposed project would be required to include streetscape and pedestrian improvements that are in keeping with the Better Streets Plan. Although street trees are not required, the Department may require landscaping and street trees as part of the streetscape plan. The Project Sponsor will be required to submit a Streetscape Plan illustrating the location and design of streetscape improvements appropriate to the street type, including site furnishings, landscaping, corner curb extensions, and sidewalk widening as appropriate. Please coordinate with the Department's Citywide Division and Urban Design Team to develop the streetscape and pedestrian improvements. The Planning Department may require these elements as part of conditions of approval.

Street improvements may include upgrading the building's street frontages up to the City's standards. If street improvements are being considered, Project Sponsors should contact DPW as early as possible to understand the process and requirements for permitting street improvements. For more information on process, guidelines, and requirements for street improvements, refer to www.sfbetterstreets.org.

Required streetscape and pedestrian improvements are not eligible for in-kind fee credit.

- Street Frontage:** Planning Code Section 145.1 outlines requirements for street frontages to ensure that they are pedestrian-oriented, fine-grained, and are appropriate and compatible with the surrounding buildings. Please ensure that the ground floor street frontage meets these requirements as related to use, height, transparency, fenestration, gates, railings and grillwork. Per Planning Code Section 145.1, the Planning Commission, under advisement from the Historic Preservation Commission, may modify or waive these requirements for designated landmarks.

6. **Parking/Off-Street Freight Loading:** Per Planning Code Section 161(k), designated landmarks do not have any required off-street parking or loading requirements.
7. **Bicycle Parking:** Planning Code Section 155.2 outlines requirements for bicycle parking for non-residential developments. For 143,960 gsf of office use, the proposed project is required to provide (28) Class 1 bicycle parking spaces and (3) Class 2 bicycle parking spaces. For entertainment use, (5) Class 1 bicycle parking spaces are required for facilities with a capacity of less than 500 guests; or, (10) Class 1 bicycle parking spaces are required for facilities with a capacity of greater than 500 guests. In addition, for the entertainment use, (1) Class 2 bicycle parking would be required for every 500 seats or every portion of each 50 person capacity. Project is also subject to the shower and locker room facilities requirement in Planning Code Section 155.4.

Please specify how the project will meet this requirement. To ensure the correct land use category for the bicycle parking requirement, please specify whether the new entertainment use would have a capacity greater than 2,000 people.

8. **Transportation Management Program.** Pursuant to Planning Code Section 163, an agreement will be required to be executed with the Planning Department to ensure that transportation brokerage services are provided for the life of the project, since the project proposes office use within an Eastern Neighborhoods Mixed Use District over 100,000 sq ft.
9. **Diaper-Changing Stations:** Planning Code Section 168 outlines the requirement for diaper-changing stations for projects proposing more than 5,000 sq ft of retail or entertainment use. Please ensure that the project meets this requirement.
10. **Public Assembly in UMU:** Planning Code Section 843 defines assembly use within the UMU Zoning District. For the Drill Court, the project proposes an assembly use consisting of spectator sports, arts activities (Planning Code Section 843.55) or nighttime entertainment (Planning Code Section 843.56). The proposed uses appear to be principally permitted; however, additional information will be required for the spectator sport use. Please provide more information on the proposed use and also provide the number of total seats for the proposed public assembly use.
11. **Office Use in UMU and City Landmarks:** Per Planning Code Section 803.9(h) and the vertical controls for office use within the UMU Zoning District, only one story of office use is principally permitted for a four-story building. However, per Planning Code Section 803.9(c), office use may be permitted as of right for designated City Landmarks and buildings listed in the California Register of Historical Resources (California Register). The Mission Armory at 1800 Mission Street is designated as Landmark No. 108 and is also listed in the California Register; therefore, the subject property would be eligible for use of Planning Code Section 803.9(c). Typically, projects are required to prepare a Historic Building Maintenance Plan (HBMP) to demonstrate that a proposed use would enhance the feasibility of preserving a landmark. Please contact Department Preservation staff for additional information on the implementation of Planning Code Section 803.9(c).

12. **Office Development Authorization:** Per Planning Code Section 321, the proposed project requires an Office Development Authorization from the Planning Commission for new office development over 25,000 gsf. Applications are available for download from the Department's website.
13. **Certificate of Appropriateness:** Since the subject property is designated as Landmark No. 108, the proposed exterior repair work would be subject to a Certificate of Appropriateness, as outlined in Planning Code Section 1006. Please identify the exterior repair work on an elevation, and also specify the repair methods for removal of the efflorescence and strengthen of the parapet. Applications are available for download from the Department's website.
14. **Eastern Neighborhoods Impact Fees.** Planning Code Section 423 outlines the requirements for development impact fees for projects located within the Eastern Neighborhoods (EN) Area Plan. The Eastern Neighborhoods Public Benefits Fund is implemented in part through district-specific Eastern Neighborhoods Impact Fee which applies to the Project Area. The proposed project is subject to Tier 2 EN Impact Fees. The proposed project includes a change of use from PDR to Non-Residential use. Please refer to the Citywide Development Fee Register for information on the most current fees. This register may be accessed on the Department of Building Inspection (DBI) website at:

<http://sfdbi.org/index.aspx?page=617>

These fee amounts are subject to annual review by the City Controller, and may be subject to change. Payment of these impact fees must be received prior to the issuance of the first site permit by DBI of the first site or building permit for a development project. Planning Code Section 423.3 also provides alternatives satisfying this requirement.

Fees shall be assessed per net new gross square footage on residential and non-residential uses within the Plan Area. Fees shall be assessed on mixed use projects according to the gross square feet of each use in the project.

15. **Jobs-Housing Linkage Program:** Pursuant to Planning Code Section 413 et seq., the Jobs-Housing Linkage Program fee will apply to this project.
16. **Transit Impact Development Fee:** Pursuant to Planning Code Section 411 et seq., the Transit Impact Development Fee will apply to this project. Please be aware that an ongoing process – the Transportation Sustainability Program – may eventually replace the Transit Impact Development Fee. Additional information on this program is available at:

<http://www.sf-planning.org/index.aspx?page=3035>
17. **Good Neighbor Policies:** Per Planning Code Section 803.5, the proposed project is subject to the Good Neighbor Policies in Mixed Use Districts. As stated in Planning Code Section 803.5(b):

(b) Good Neighbor Policies for Nighttime Entertainment Activities in Eastern Neighborhoods Mixed Use Districts, South of Market Mixed Use Districts and Downtown Residential Districts. Within

Eastern Neighborhoods Mixed Use Districts, South of Market Mixed Use Districts, and Downtown Residential Districts where nighttime entertainment activities, as defined by Section 102.17 of this Code, are permitted as a principal or conditional use shall not be allowed except on conditions which, in the judgment of the Zoning Administrator or City Planning Commission, as applicable, are reasonably calculated to insure that the quiet, safety and cleanliness of the premises and vicinity are maintained. Such conditions shall include, but not be limited to, the following:

- (1) Notices shall be well-lit and prominently displayed at all entrances to and exits from the establishment urging patrons to leave the establishment and neighborhood in a quiet, peaceful, and orderly fashion and to please not litter or block driveways in the neighborhood; and*
- (2) Employees of the establishment shall be posted at all the entrances and exits to the establishment during the period from 10:00 p.m. to such time past closing that all patrons have left the premises. These employees shall insure that patrons waiting to enter the establishment and those existing in the premises are urged to respect the quiet and cleanliness of the neighborhood as they walk to their parked vehicle or otherwise leave the area; and*
- (3) Employees of the establishment shall walk a 100-foot radius from the premises some time between 30 minutes after closing time and 8:00 a.m. the following morning, and shall pick up and dispose of any discarded beverage containers and other trash left by area nighttime entertainment patrons; and*
- (4) Sufficient toilet facilities shall be made accessible to patrons within the premises, and toilet facilities shall be made accessible to prospective patrons who may be lined up waiting to enter the establishment; and*
- (5) The establishment shall provide outside lighting in a manner than would illuminate outside street and sidewalk areas and adjacent parking, as appropriate; and*
- (6) The establishment shall provide adequate parking for patrons free of charge or at a rate or manner that would encourage use of parking by establishment patrons. Adequate signage shall be well-lit and prominently displayed to advertise the availability and location of such parking resources for establishment patrons; and*
- (7) The establishment shall provide adequate ventilation within the structures such that doors and/or windows are not left open for such purposes resulting in noise emission from the premises; and*
- (8) Any indoor and/or outdoor activity allowed as a principal or conditional use and located within 100 feet of a residential or live/work unit shall, during the period from 10:00 p.m. to 6:00 a.m., insure that sound levels emanating from such activities do not exceed the acceptable noise levels established for residential uses by the San Francisco Noise Ordinance; and*
- (9) The establishment shall implement other conditions and/or management practices, including the prohibition of dancing to recorded music (disco dancing), as determined by the Zoning Administrator, in consultation with Police Department and other appropriate public agencies, to be necessary to insure that management and/or patrons of the establishments maintain the quiet, safety, and cleanliness of the premises and the vicinity of the use, and do not block driveways of neighboring residents or businesses.*

PRELIMINARY DESIGN COMMENTS:

Since the project does not include any major exterior alterations or new construction, the Department does not have any design comments on the proposed project. As a City Landmark, any exterior work will be subject to review by the Historic Preservation Commission through the Certificate of Appropriateness process. Any exterior or interior work should be closely coordinated with Department Preservation staff to ensure that exterior and interior character-defining features are preserved and/or repaired.

PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Office Development Authorization, or Building Permit Application, as listed above, must be submitted no later than **September 26, 2015**. 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

cc: Peter Acworth, Property Owner
Richard Sucre, Current Planning
Kei Zushi, Environmental Planning
Menaka Mohan, Citywide Planning and Analysis
Jerry Robbins, MTA
Jerry Sanguinetti, DPW