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Mr. Anthony Chan, Managing Member  
Worldco Company, LLC  
1388 Sutter Street  
San Francisco, CA 94109

January 19, 2015

**Ref: 1288 Howard Street – Mixed-Use Development**

Dear Mr. Chan,

Thank you for bringing your proposal for 1288 Howard Street to the San Francisco Housing Action Coalition's (SFHAC) Project Review Committee on December 10, 2014. Upon review, we endorse this project, as we believe it has merit and will contribute to SFHAC's mission of increasing the supply of well-designed, well-located housing in San Francisco. Please review this letter, which explains how your project meets our guidelines as well as areas in which improvements are suggested. Also see our report card, which grades the proposed project according to each guideline. We have attached a copy of our project review guidelines for your reference.

**Project Description:** The project proposes merging five existing lots to create a two-building, mixed-use development (55-foot and 45-foot heights) comprised of 125 dwelling units, with 13,000 square feet of flex/office/retail ground-floor space and a 92-space subterranean parking garage.

**Land Use:** This is an outstanding site for new housing. It is located in the rapidly evolving SoMa area, close to jobs, transit and neighborhood amenities. A small strip mall, including a Shell gas station, Starbucks and Burger King, currently occupies the site. Housing and mixed-use development are a significantly better use. It should be noted that this project faces unique zoning circumstances, as it straddles three different zoning districts: Regional Commercial District (RCD), Western SoMa General Use District (WSGUD) and Residential Enclave Mixed-use District (RED Mix).

**Density:** The project appropriately maximizes the building envelope by providing 125 new homes, comprised of studio, one-bedroom and two-bedroom units.

**Affordability:** The SFHAC supports your team's proposal to include 15 below-market-rate Inclusionary units on site at the standard 12 percent rate.

**Parking and Alternative Transportation:** This site is within walking distance of the Civic Center BART Station, as well as several MUNI bus lines. The project will include 92 car parking spaces, 29 for the commercial spaces and 63 for the residential

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spaces. This equates to a ratio of 0.5 spaces per residential unit. We urge your team to resist some of your neighbor's insistence on increasing the amounts of car parking. This runs counter to the City's transit-first policies and ignores the realities of increasing traffic congestion in this area.

We applaud your team for taking part in the City's new transportation demand management (TDM) program. As a result, the project will offer several innovative measures to encourage multi-modal transportation. These include five car share spaces, 50 percent Muni transit subsidies for the first to year to residents not owning a car, and move-in information packets for all new residents.

We urge you to consider increasing the bike-parking ratio in this project. Currently, 110 spaces are proposed, whereas virtually all of the projects we review in the City's urban core provide at least a 1:1 bike space-to-housing-unit ratio.

**Preservation:** There are no structures of significant cultural or historic merit on or near the site that would be affected by the proposed project.

**Urban Design:** The SFHAC's members applauded how the project's design was adapted to the controlling heights of the two zoning districts. Open space would be provided in the form a mid-block pedestrian alleyway and in a central courtyard over the podium. Under the misguided rules of the Western SoMa Area Plan, rooftop open space cannot be counted towards the project's open space requirements. This is a significant loss, given the generous amount of sunny space with wonderful views this project could provide.

The SFHAC suggests further activation of the mid-block alleyway, which could come by adding lighting and street furniture. We encourage you to add more building entrances along Natoma Street to create increased pedestrian activity. In addition, the ground-floor commercial spaces would more successfully activate the street and the neighborhood if they were occupied by retail, as opposed to office. The SFHAC generally prefers office uses above ground floor.

**Environmental Features:** We support your complying with the City's Green Point rating. Some of the measures you proposed include incorporating high-efficiency plumbing storm water runoff from the roof. However, our members believe the lack of programming on the roof deck is a missed opportunity. We encourage you to explore how to utilize this space to improve the building's environmental efficiency. Finally, we recommend that you explore installation of individual water sub-metering. It is likely there will local or statewide legislation before long that mandates this water conservation measure for new multifamily construction.

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**Community Input:** The SFHAC commends your efforts to engage the surrounding community regarding your proposal. Your team held three meetings with neighborhood residents and was preparing for a fourth at the time of your presentation to us. We encourage you to continue reaching out to community and responding to any legitimate suggestions that can be readily accommodated.

Thank you for presenting your proposal for 1288 Howard Street to our Project Review Committee. We are pleased to endorse it with the reservations noted above. Please keep us abreast of any changes and let us know how we may be of assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tim Colen", is displayed on a light blue background.

Tim Colen, Executive Director

CC: City Planning Commission

## **SFHAC Project Review Guidelines**

**Land Use:** Housing should be an appropriate use of the site given the context of the adjacent properties and the surrounding neighborhood and should enhance neighborhood livability.

**Density:** The project should take full advantage of the maximum unit density and/or building envelope, allowable under the zoning rules.

**Affordability:** The need for affordable housing, including middle income (120-150 of Area Median Income) housing, is a critical problem and SFHAC gives special support to projects that propose creative ways to expand or improve unit affordability beyond the legally mandated requirements.

**Parking and Alternative Transportation:** SFHAC expects the projects it endorses to include creative strategies to reduce the need for parking, such as ample bicycle storage, provision of space for car-share vehicles on-site or nearby, un-bundling parking cost from residential unit cost, and measures to incentivize transit use. Proximity to transit should result in less need for parking.

In districts with an as-of-right maximum and discretionary approval up to an absolute maximum, SFHAC will support parking exceeding the as-of-right maximum only to the extent the Code criteria for doing so are clearly met. In districts where the minimum parking requirement is one parking space per residential unit (1:1), the SFHAC will not, except in extraordinary circumstances, support a project with parking in excess of that amount.

**Preservation:** If there are structures of significant historic or cultural merit on the site, their retention and/or incorporation into the project consistent with historic preservation standards is encouraged. If such structures are to be demolished, there should be compelling reasons for doing so.

**Urban Design:** The project should promote principles of good urban design: Where appropriate, contextual design that is compatible with the adjacent streetscape and existing neighborhood character while at the same time utilizing allowable unit density; pleasant and functional private and/or common open space; pedestrian, bicycle and transit friendly site planning; and design treatments that protect and enhance the pedestrian realm, with curb cuts minimized and active ground floor uses provided.

Projects with a substantial number of multiple bedroom units should consider including features that will make the project friendly to families with children.

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**Environmental Features:** SFHAC is particularly supportive of projects that employ substantial and/or innovative measures that will enhance their sustainability and reduce their carbon footprint.

**Community Input:** Projects for which the developer has made a good faith effort to communicate to the community and to address legitimate neighborhood concerns, without sacrificing SFHAC's objectives, will receive more SFHAC support.