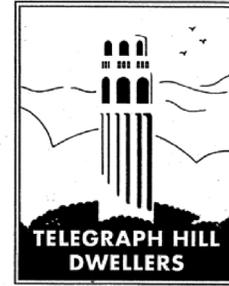


August 26, 2021

Colum Regan
Aralon Properties, Inc.
482 Bryant Street
San Francisco, CA 94107
(Via email: colum@aralonproperties.com)



RE: 955 Sansome Street (2021-0009035PPA)

Dear Mr. Regan,

As you may recall, the Telegraph Hill Dwellers' Planning and Zoning Committee invited you to participate in our discussion of your proposed project at 955 Sansome Street. Because you declined our invitation, we have reviewed the plans and massing study that you submitted to the Planning Department with your Preliminary Project Assessment (PPA) Application.

From this material, we understand that your proposed project would demolish the existing 3-story parking garage and construct a new 8-story, 84-foot high (as measured at the building's half-way point up Vallejo Street) mixed-use structure containing three stories of office and garage space and 24 dwelling units in the four upper stories and mezzanine.

Our review of your plans and subsequent discussion identified a number of concerns that we have with your proposed project, including the following.

Building Not Compatible With Historic District

We are concerned that the building as described in your plans and massing study is not compatible with the historic district in which it is located. The site of the proposed building is in the Northeast Waterfront Historic District (see Figure 1). As such, a Certificate of Appropriateness (COA) is required under Planning Code Sec. 1006(1), without which, under the conformity and permit provisions of Sec. 1005, no City permits can be issued. To approve a COA, the Historic Preservation Commission (HPC) must make certain findings under Sec. 1006.6, including the following:

*“(d) For applications pertaining to property in historic districts, other than on a designated landmark site, **any new construction, addition or exterior change shall be compatible with the character of the historic district...** for any exterior change where the subject property is not already compatible with the character of the historic district, **reasonable efforts shall be made to produce compatibility, and in no event shall there be a greater deviation from compatibility...**” [bolding added]*

We recognize that, at least at the time of our P&Z Committee meeting, you had not yet retained an architect. Nonetheless, we strongly believe from your PPA plans and massing study (see the rendering in Figure 2) that the HPC will be unable to make the above required COA finding. As proposed, your building would be substantially higher and more massive than adjoining structures, it would not conform to the prevailing character of the Northeast Waterfront Historic District, and it would constitute a materially greater deviation from compatibility than the existing structure.

According to your PPA plans, your proposed building would be built to the maximum zoning height limit of 84 feet, which you measured at the building's half-way point up Vallejo Street. Also according to your plans, the height of the building as measured along the Sansome Street frontage would be 98 feet above Sansome Street at its intersection with Vallejo Street.

Figure 3 shows that, at 98 feet above Sansome Street, your proposed building would significantly exceed the Sansome Street frontage height of other buildings in the historic district. The average Sansome Street frontage height of the buildings shown in the figure is 43 feet. Built in 1914 for the National Ice and Cold Storage Company, only the historic Ice House building at the extreme northwest corner of the historic district at Union and Sansome streets and abutting Levi Plaza rises to a height of 84 feet above Sansome Street (perhaps explaining the 84-foot zoning height limit). Your proposed building would exceed the 84-foot height above Sansome by two stories and be more than triple the 30-foot height of the existing garage at your site.

RECOMMENDATION: We urge you to materially reduce the size of your proposed building and design it to be compatible with the historic district.

Building Height And Mass Excessive

We are concerned that your building, as proposed at 8 stories, is excessively high and massive. The three lower stories are proposed for office and garage use. Given the dire effects of the pandemic on office space vacancy, it is unclear to us whether your proposal for office space is justified by its stand-alone economic value or, instead, is more a means to push your residential units upward physically, increasing their sales or rental prices. Office space could be eliminated, as could garage space, given San Francisco's Transit First policy.

Moreover, the residential unit size is large, resulting in a more massive building than necessary. The average size of your proposed residential units is about 2,200 square-feet. This is nearly three times larger than the square footage of nearby homes (a survey conducted by THD of more than four hundred residential units near the top of Telegraph Hill found that the average unit size was about 830 square feet). Also, the top three units (#22, #23, and #24) are two-story units (Level 7 and Mezzanine), unnecessarily adding an extra story to the building.

RECOMMENDATION: We urge you to reduce the residential unit size, eliminate the second story of the two-story units, and reduce or eliminate office and garage space.

Casts Shadow On Elementary School And Playground

We are concerned about the shadow that would be cast by your proposed building on the John Yehall Chin Elementary School, including its playground. A preliminary shadow fan analysis was prepared by planning staff and included in their PPA letter. Planning staff concluded that "the new building would cast shadow" on the school property. This shadowing would occur on approximately half of the school and playground site.

RECOMMENDATION: We urge you to conduct a more detailed shadow analysis and modify your project to eliminate the shadowing of school property.

Cannot Qualify For Required Rear-Yard Variance

We are concerned that your project is so large that it requires a rear-yard variance. According to your PPA plans, the proposed building would be built immediately up to the adjacent property line on the south side of Vallejo Street, completely blocking windows of adjacent homes to the west. Figure 4 shows those homes and the more than 70 other affected homes. By blocking or interfering with the sunlight and air to those homes, it will not be possible for the Planning Commission to make the findings necessary for granting your required variance, particularly the finding of non-detriment to the neighborhood.

RECOMMENDATION: We urge you to redesign and downscale your building to retain adequate access to sunlight and air for affected homes.

No On-Site Affordable Housing

We are concerned that your project provides no on-site affordable housing. Instead, we understand that you intend to pay in-lieu fees under the San Francisco's Inclusionary Housing Program. Such on-site housing is badly needed in this area, and should be added to this project. The absence of on-site affordable housing compounds the affordability problems with your project. Your proposed market-rate units are nearly three times larger than other units on Telegraph Hill (see earlier comment), allowing you to charge a higher (and less affordable) premium price.

RECOMMENDATION: We urge you to make at least some of the residential units in your project on-site affordable units.

* * *

We look forward to the further and substantive modification of this project to address the concerns outlined above.

Sincerely,



Stan Hayes
Co-Chair, Planning & Zoning Committee
Telegraph Hill Dwellers

cc: Samantha Updegrave, Planning Department samantha.updegrave@sfgov.org
Claudine Asbagh, Supervisor, Planning Department claudine.asbagh@sfgov.org
Supervisor Aaron Peskin, District 3 aaron.peskin@sfgov.org



Figure 1 – 955 Sansome is located in the Northeast Waterfront Historic District.

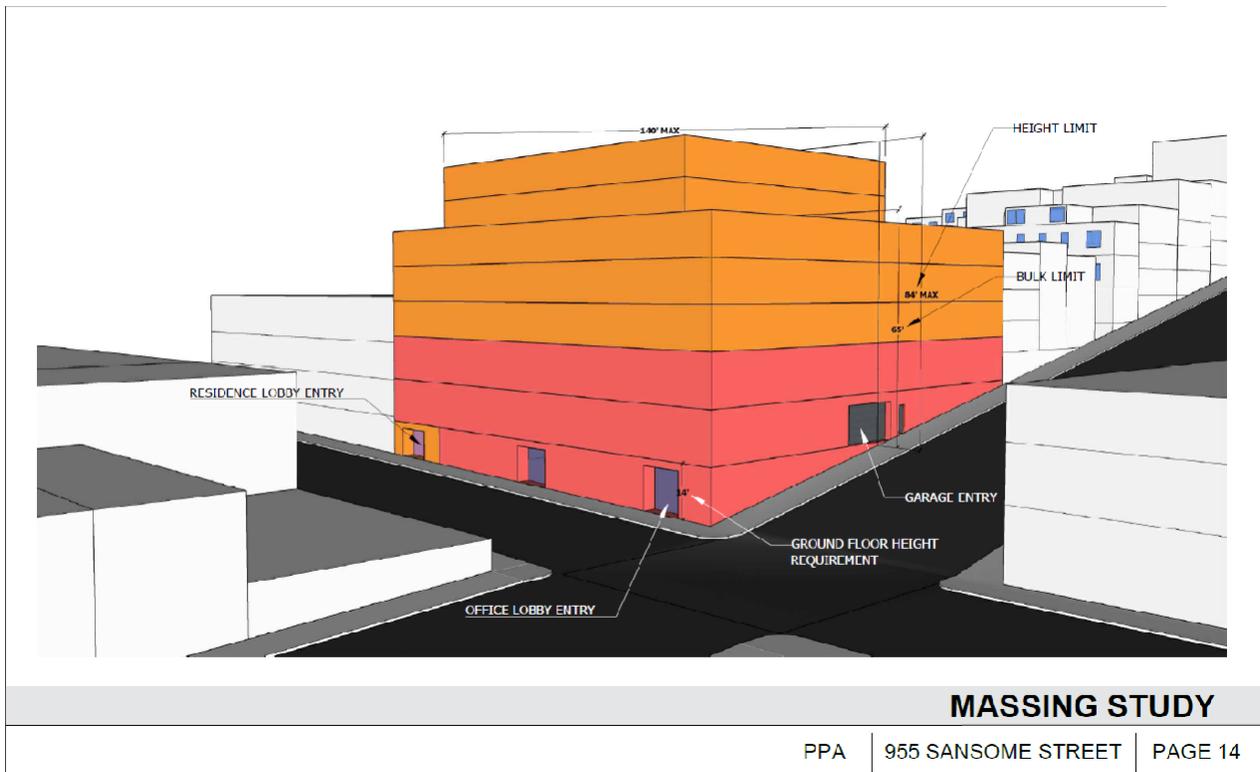


Figure 2 – 955 Sansome would be significantly taller and more massive than adjoining buildings.

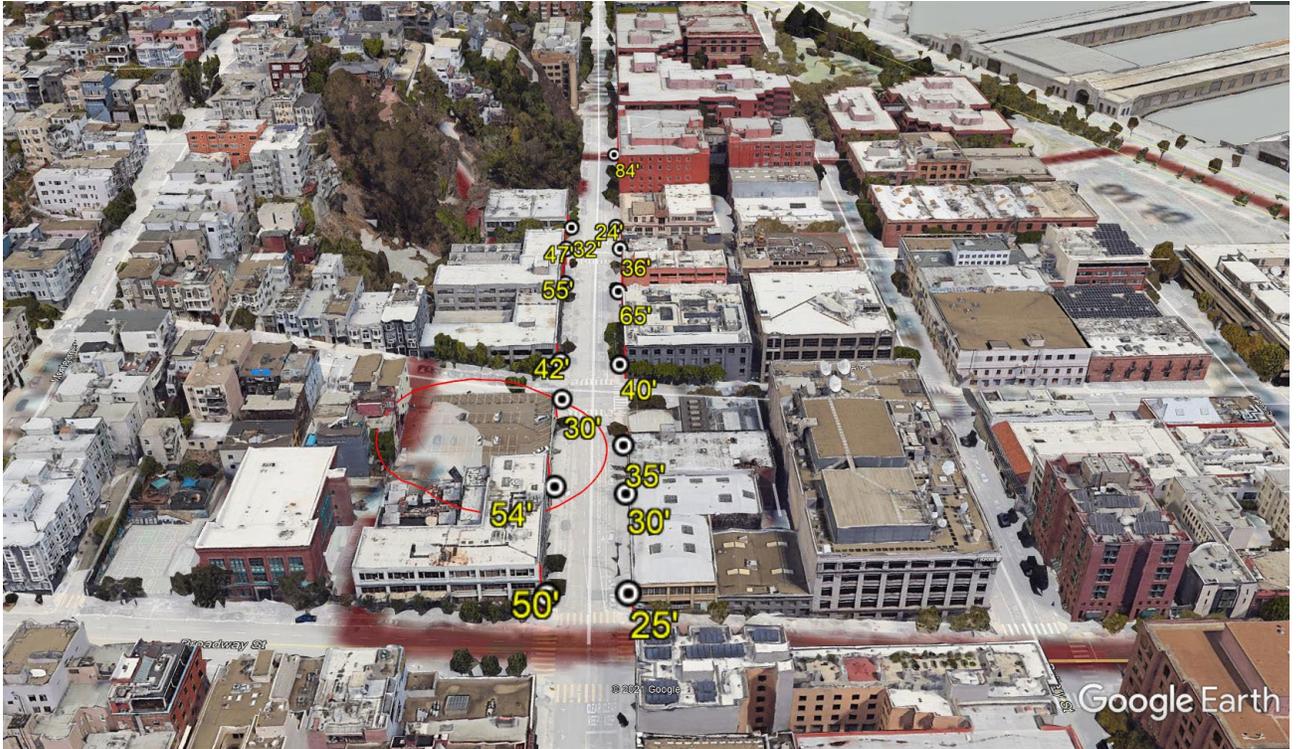


Figure 3 – 955 Sansome, at 98 feet above Sansome, would be incompatible with the height and scale of adjoining buildings along Sansome (note: brown line shows boundary of historic district).



Figure 4 – View toward adjoining homes whose light and air would be blocked.