



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: November 27, 2018
TO: San Francisco Recreation and Parks Commission
CC: Stacy Radine Bradley, AICP
Yael Golan
FROM: Christopher Espiritu, Environmental Planning
RE: 1052-1060 Folsom Street and 190-194 Russ Street Project Shadow Study (Planning Department Case No. 2016-004905ENV)

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

This memo is to confirm that the Planning Department's shadow analysis for the 1052-1060 Folsom Street and 190-194 Russ Street project has been completed. The shadow analysis will be included in the forthcoming Community Plan Evaluation to be published on December 4, 2018. The following includes our findings:

Shadow

Planning Code Section 295 generally prohibits new structures above 40 feet in height that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space. Under the Eastern Neighborhoods Rezoning and Area Plans, sites surrounding parks could be redeveloped with taller buildings without triggering Section 295 of the Planning Code because certain parks are not subject to Section 295 of the Planning Code (i.e., under jurisdiction of departments other than the Recreation and Parks Department or privately owned). The Eastern Neighborhoods PEIR could not conclude if the rezoning and community plans would result in less-than-significant shadow impacts because the feasibility of complete mitigation for potential new shadow impacts of unknown proposals could not be determined at that time. Therefore, the PEIR determined shadow impacts to be significant and unavoidable. No mitigation measures were identified in the PEIR.

The proposed project would construct a 65-foot-tall building (with an additional 15 feet for rooftop mechanical equipment and an elevator/stair penthouse); therefore, the Planning Department prepared a preliminary shadow fan analysis to determine whether the project would have the potential to cast new shadow on nearby parks. The shadow fan indicated that the proposed project would potentially cast new shadows on Victoria Manalo Draves Park and on the playground at Bessie

Carmichael Elementary School.¹ Victoria Manalo Draves Park is under the jurisdiction of the Recreation and Park Commission. Thus, project-generated shadow on the park is subject to Section 295 of the Planning Code.

Based on the results of the preliminary shadow fan analysis, a detailed shadow study was prepared for the proposed project pursuant to Planning Department guidance.² The shadow study consists of quantitative and qualitative analysis of the potential shadow impacts to Victoria Manalo Draves Park, including analysis of existing surrounding buildings and cumulative projects (i.e. reasonably foreseeable development projects with the potential to shadow Victoria Manalo Draves Park). The shadow analysis was conducted for representative times of the day for three representative days of the year. The representative days are the summer solstice (June 21), when the midday sun is at its highest and shadows are shortest; the autumnal/vernal equinoxes (September 20/March 22), when shadows are midway through a period of lengthening; and the winter solstice (December 20), when the midday sun is at its lowest and shadows are longest.

The Proposition K memorandum, dated February 3, 1989, was developed by the Recreation and Park Department and the Planning Department³ to established tolerance levels for new shading for specific parks and established criteria for parks not named in the memorandum but still subject to Section 295 of the Planning Code. The tolerance limits are based on the new shadow-foot-hours that would potentially be added to a park as a percentage of the theoretical total square-foot-hours (sfh)⁴ of sunlight for that property over a period of one year. The Proposition K memorandum established generic criteria for determining a potentially permissible quantitative limit for additional shadows, known as the absolute cumulative limit, for parks not named in the memorandum. Victoria Manalo Draves Park was not named in the Proposition K memorandum and, at 2.53 acres (109,997 sq. ft.), it is considered a large park which is shadowed less than 20 percent of the time during the year. As such, it is recommended that additional shadow of up to one percent could be potentially permitted if the shadow meets the qualitative criteria of the park. The qualitative criteria includes existing shadow

¹ Schoolyards that are enrolled in the Shared Schoolyard Project are considered to be publicly accessible and should be included as public open spaces within the shadow analysis for CEQA review. Bessie Carmichael Elementary School is not currently enrolled as a participating school within the San Francisco Shared Schoolyard Project (<http://www.sfsharedschoolyard.org/>). Therefore, project-generated shadow on Bessie Carmichael Elementary School is not discussed in this checklist.

² Prevision Design, Shadow Analysis Report for the Proposed 1052 Folsom Street per SF Planning Section 295 Standards, October 20, 2018.

³ San Francisco Planning Department, Proposition K – The Sunlight Ordinance Memorandum, February 3, 1989.

⁴ The amount of sun the park would receive throughout the year if there was no shadow on the park at any time.

profiles, important times of day and seasons in the year associated with the park's use, the size and duration of new shadows, and the public good served by the buildings casting new shadow. Approval of new shadow on Victoria Manalo Draves Park would require hearings at the Recreation and Park Commission and the Planning Commission.

Victoria Manalo Draves Park

Victoria Manalo Draves Park is a public park located on Lot 16 of Assessor's Block 3754 and encompasses the entire block bounded by Folsom Street to the northwest, Harrison Street to the southwest, Columbia Square to the northeast and Sherman Street to the southwest. The park contains a baseball field, a batting cage along Columbia Square, fixed picnic tables, playground areas with playground equipment, restrooms, landscaped areas, and walkways. The park is enclosed by a 5-foot-tall fence and locked at night. It is open from sunrise to sunset, 365 days per year.

The analysis determined that the proposed project would cast new shadow on Victoria Manalo Draves Park throughout the year. New shadows from the proposed project would occur between approximately February 23rd and October 17th annually and would enter the park in the late afternoon between approximately 5:15 and 6pm and be present through the remainder of the afternoon and evening. New shadows would occur in the northeastern quarter of the park and at various times would cast new shadows on the park entry, the basketball court, the northern children's play area, lawn areas, and seven fixed benches. The days of maximum shading on the park due to the proposed project would occur on June 21, when the proposed project would shade the northeastern quarter of the park starting between 5:46pm and 6pm and be present for between 96-110 minutes within Section 295 times. Maximum shading would occur at a time (7:36pm) when both existing and project shadows would be lengthening at an accelerated rate as compared to other times of day. The largest new shadow would cover 20,064 sf, equal to 18.24% of the total park area (existing shading at that time covers 30% of the park area). The proposed project would not cast new shadows on the Gene Friend Recreation Center nor any other public parks, privately owned public open spaces, nor the outdoor play area of the Bessie Carmichael Elementary School.

In order to assess park usage, a qualitative analysis was conducted for the project. The analysis included six 30-minute observation periods conducted during the morning, mid-afternoon, and late afternoon/early evening times between May 18 and May 20, 2018. Based on these observations, the number of users in the park ranged from 4 to 68, with uses that varied at different times of day and days of the week. Observed park uses included children playing in the playground areas, eating lunch and resting on benches, walking dogs, playing basketball or soccer,

barbecuing, working in the community garden and for a small portion of observed users, passing through the park. Overall, observed usage of the park was higher during the weekday midday and afternoon observation periods as well as during the weekend morning and midday observation periods. The areas with the highest use at these times were children using the playground areas, with fewer users occupying the other park features. On both morning observations and the weekday afternoon visit, one user was observed working in the community garden area. The observed intensity of use varied between the various observation times but could be characterized as low to moderate given the park's size. Observed peak use on May 21 corresponded to a ratio of approximately 1,615 square feet of park area per user.

As previously described, new shadow due to the proposed project would occur in the northeastern quarter of the park and would occur during the late afternoon between approximately 5:15 and 6pm. New shadows cast by the project on the park entry, the basketball court, the northern children's play area, lawn areas, and seven fixed benches would be present through the remainder of the afternoon and evening. In addition, less sensitive areas such as the park entry, grassy areas, edges of the ball field and walkways, would also receive new shadow. However, the new shadow would occur in the late afternoon when lower levels of weekday and weekend use were observed (relative to the peak usage time around noon). Additionally, shading from the proposed project would be cast over the top of intervening buildings, which already cast shadows on the park. Although shadows would increase in the late afternoon, no single location within the park would be in continuous new shadow for longer than 15 minutes. Based on the above, the new shadow resulting from the proposed project would not be expected to substantially affect the use and enjoyment of the park as the shadow would occur during lower levels of weekday and weekend use and would be of short duration in any given area. Therefore, the proposed project would result in less-than-significant shadow impacts on Victoria Manolo Draves Park.

The proposed project would also shade portions of nearby streets and sidewalks and private property at times within the project vicinity. Shadows upon streets and sidewalks would not exceed levels commonly expected in urban areas and would be considered a less-than-significant effect under CEQA. Although occupants of nearby property may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA.

For the above reasons, the proposed project would not result in significant impacts related to shadow that were not identified in the Eastern Neighborhoods PEIR.

November 27, 2018

1052-1060 Folsom Street and 190-194 Russ Street Project Shadow Study

Page 5

Should you have questions or need additional information from the Planning Department or the project sponsor, please contact me at 415-575-9022 (Christopher.Espiritu@sfgov.org).