MEMO

HEARING DATE: OCTOBER 13, 2011 DIRECTOR'S REPORT

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

DATE: October 6, 2011

Reception: 415.558.6378

TO: Planning Commission

Fax: 415.558.6409

FROM: Planning Department PPA Team

RE: Preliminary Project Assessment (PPA) – 6 Month Analysis

Planning Information: 415.558.6377

The Preliminary Project Assessment (PPA) program was officially initiated on February 1, 2011. The Planning Department committed to evaluating the PPA process after six months to help determine if the core components of the program were appropriate, and to track its impact on staff time and resources. The results of this analysis are provided below.

BACKGROUND

PPA is designed to coordinate internal review and provide preliminary feedback to project sponsors early in the development process for moderate and large projects. This helps ensure that applicants understand the approval process and are aware of any potential issues that may need to be addressed before development applications are filed. PPAs are required for any project proposing to add six or more dwelling units or construct more than 10,000 square feet of non-residential space. No other development applications for these projects may be submitted until the required PPA is issued.

The PPA is the first step of an integrated revision to the Department's development review process. The revised process also includes a new "Project Description" phase in which all sections will acknowledge and approve the project description being studied under CEQA; and a new "Entitlement" phase, which will be triggered during a specific phase of environmental review and follow similar procedures as entitlements reviewed currently.

While the PPA process shifts some costs forward for Project Sponsors, it is designed to make the overall development review process more efficient. It is also designed to be fee-neutral by crediting the PPA fee toward the eventual Environmental Evaluation application fee for the associated project. Additionally, each PPA is posted on the Department website under the "Resource Center/Department Publications A-Z" once it is issued for public viewing.

ANALYSIS

A quantitative analysis of the PPA process produced the following results:

Volume: A total of 20 PPA applications were filed during the first 7 months, resulting in an
average of nearly 3 PPA applications per month. This is a manageable number of applications
for the Department to process within its existing workload.

- **Processing:** The goal is to issue each PPA letter within 60 days of receiving the application. Out of the 12 PPAs issued in the first 7 months, 11 were issued within 60 days. The average time for PPA issuance was 55 days. The lone outlier was issued in 63 days.
- **Staff Time:** Excluding one major outlier project, which was not representative of the typical range of PPA projects, the average PPA used a total of 46 hours of staff time.
- <u>Fee</u>: The current PPA fee is \$4,519. Excluding the major outlier project mentioned above, the average PPA used \$4,461 of staff time.

FEEDBACK

Planners on the PPA Development Team solicited feedback regarding the PPA program from Department staff and Project Sponsors. The feedback from staff was generally positive, although there are several adjustments that are needed to the Department's internal procedures to ensure the highest levels of efficiency, cooperation, and quality. Additionally, some Department managers noted that the PPA letters were helpful in assessing the amount of staff time and experience levels needed for planners subsequently assigned to review the environmental and entitlement applications.

Staff sought project sponsor feedback through an on-line survey and through direct solicitation of comments. While project sponsor feedback was limited, staff was able to discern some initial views. Some project sponsors were appreciative that timelines for review were adhered to and the thoroughness and completeness of comments. Others thought an additional 60-days (the PPA review period) added undue delay to being able to apply for environmental review. Still others, while expressing skepticism of the necessity of the process, noted that its effectiveness will not be fully known until the entire review process (including environmental and entitlement) was complete.

CONCLUSIONS

These results show that the core components of the PPA program (i.e. 60-day processing goal, application fee, etc.) are appropriate. As such, the Department intends to continue the program in its current format while also continuing to gather feedback from staff, project sponsors, and the public. The Department will use this feedback to continue to make the internal PPA procedures more efficient and effective.