



SAN FRANCISCO FIRE DEPARTMENT
CITY AND COUNTY OF SAN FRANCISCO

April 27, 2023

Hon. London N. Breed
Mayor, City & County of San Francisco
City Hall
#1 Dr. Carlton B. Goodlett Place
Room 200
San Francisco, CA 94102

SUBJECT: Executive Directive 23-01 Housing for All, Performance & Improvement Plan

Dear Mayor Breed,

Please find attached the San Francisco Fire Department's Housing Delivery Performance Assessment and Implementation Plan.

If you have any questions or concerns, please do not hesitate to contact me.

Regards,

A handwritten signature in black ink, appearing to read "J. Nicholson".

Jeanine R. Nicholson

Chief of Department
Attachment



SAN FRANCISCO FIRE DEPARTMENT

MEMORANDUM

TO: Interagency Implementation Team

FROM: Fire Marshal Ken Cofflin

SUBJECT: Executive Directive 23-01 Housing for All, Performance Assessment & Improvement Plan

DATE: 04/27/23

On February 7, 2023, Mayor London N. Breed issued Executive Directive 23-01. The Directive focuses on changing how housing is approved and built. It sets forth specific policies and actions that the City and various City Agencies must fulfill over the next eight years; including the goal of building 10,000 affordable housing units per year. This new housing goal is an increase of 100% from the previous Executive Directive 17-02.

In response to the Directive, the San Francisco Fire Department - Bureau of Fire Prevention has developed the following Performance Assessment & Implementation Plan outlining specific measures to achieve the Housing Element goals.

1) SFFD's Role in Housing Production:

San Francisco Fire Department's role in housing production varies according to project size and scope. The number of buildings, their height and area, street widths, and construction type all play a role in the requirements of the Fire Code and what FIRE actually reviews. Large-scale development projects containing multiple blocks and lots include, but are not limited to, FIRE's review of the following:

- Horizontal Infrastructure
 - Site plans
 - Subdivision Maps
 - Street Improvement Plans (SIP)
 - SFFD apparatus & firefighter building access
 - Waterflow analysis and locations for AWSS and low-pressure hydrants
- Vertical Design
 - Architectural

- Steel stairs
- Curtain walls
- Elevators (FSAE & OEE)
- Life Safety
 - Sprinkler System (including standpipes & underground piping)
 - Fire Alarm and/or Smoke Detection System
 - Emergency generator/fuel-oil piping
 - Emergency Responder Radio Coverage System (ERRCS)
 - Dedicated Function Fire Alarm System (e.g., Elevator Recall, Sprinkler Monitoring)
 - Smoke Control Systems
 - Air Replenishment Systems
 - Emergency Evacuation Signage
- Exhibit A - SFFD Community Development Housing Production Flowchart

While a small-scale housing project of a single (non-high-rise) building may be limited to FIRE reviewing only the following:

- Vertical Design
 - Architectural
 - Egress
 - Firefighter access
- Life Safety
 - Sprinkler System
 - Fire Alarm System
 - Emergency Evacuation Signage

The Bureau of Fire Prevention maintains staff with expertise in reviewing fire code requirements and the various life-safety systems listed above. To assist with the expedited review and approval of housing, the SFFD maintains two groups of plan reviewers. The Housing & Community Development (HCD) plan review team, who is tasked with solely working on largescale developments at a focused and increased pace, while our normal Plan Check team reviews smaller single building projects at a non-expedited pace.

- Exhibit B – BFP Organization Chart

2) Performance Assessment:

The SFFD Housing & Community Development (HCD) team continues to be proactive in making projects under ED 17-02 a priority. Members of this team were selected for their outstanding dedication in giving every job special attention, efficiently allocating their working hours, and independently managing their work

schedules. As a result, they continually exceed deadlines outlined in Memoranda of Understanding and Interagency Cooperation Agreements. SFFD-HCD's goal is to complete initial review and issue comments within two to three weeks of receiving plans and to complete a secondary review within one to two weeks after receiving responses to comments from the designer/applicant, as reflected on Exhibit E.

- Exhibit D – Average timeframes for SFFD's review and approval, including time SFFD's comments are with the applicant, and overall time from application to final approval.

3) SFFD Housing Coordinator:

In 2018, per ED 17-02, Section 3, Chief of Department Jeanine Nicholson, designated a senior manager, Captain Mike Patt, to be responsible for coordinating and streamlining the Department's effort to approve and permit new housing developments. Under ED 17-02, the senior manager is responsible for ensuring that the housing approval team is adequately staffed. The senior manager was also directed to take full advantage of developer reimbursement opportunities to add staff where needed for expediting housing approvals.

The SFFD Housing & Community Development team, supervised since July 2020 by senior manager, Chief Lourdes Russell, has been very successful in continuing to fulfill the goals as set forth in ED 17-02 and in subsequent implementation efforts.

Chief Russell has effectively served as the liaison between City agencies and remained the single point of contact for all Large Community Development projects reviewed by the SFFD. Chief Russell has been responsible for managing each project from horizontal approvals through vertical development. She continues to practice coordination, collaboration, cooperation, while facilitating communication, and exercising conflict resolution to move projects along in an expeditious manner.

Having the needed resources to adequately staff the team proved to be a challenge as projects progressed from horizontal to vertical plan review, which required multiple reviews. SFFD HCD staff focusing solely on housing was doubled in response to the additional reviews and the need to meet the productivity goal of 5,000 units per year. Chief Russell continues to monitor staff workloads to ensure the same level of expedited review is maintained as the City works to permit 82,000 units over the next 8 years.

4) Process Improvements:

Past improvements completed in accordance with Executive Directive 18-01 and 17-02, which remain in effect to date:

The goal of ED 18-01 was to accelerate the approval of Accessory Dwelling Units (ADUs) and clear the application backlog. The Bureau of Fire Prevention designated a team of two members whose focus was to work on clearing the plan review backlog and approve future incoming ADU plans. A weekly ADU Roundtable Meeting consisting of Planning, DBI, and FIRE was created resolve issues and answer questions collectively. The ADU team's plan review backlog was successfully cleared within four (4) months. To date, FIRE continues to have a dedicated team for ADU plan review. SFFD's average review time, from when an ADU plan is assigned to an ADU Fire plan reviewer and comments are given to the applicant, is two (2) days. Currently, no backlog for ADUs exists.

In response to ED 17-02, the SFFD Housing & Community Development (HCD) team was created. The HCD team initially consisted of one Bureau of Fire Prevention Captain and one Fire Protection Engineer (FPE). The two members were responsible for the end-to-end process of horizontal through vertical development of all projects under this directive and successfully contributed to accelerating construction and delivery of housing by expediting plan review.

- Exhibit C – Executive 17-02 SFFD Action Plan & Agreement Memo Prioritizing Review

To keep up with the pace of housing production, maintain a high level of accelerated plan review, and make schedule-impacting decisions faster, the HCD team was expanded in 2020 to now be comprised of an Assistant Fire Marshal (AFM), one lieutenant, one full time FPE, and one part time FPE. In an effort to keep up with fluctuating plan review demand, the HCD team also conducts as needed after hours expedited plan review to maintain consistent positive turnaround time frames.

Electronic Plan Review (EPR) has proven to be an effective and faster way for plan review and comment submissions for the SFFD Housing & Community Development team (Exhibit E). A majority of applicants have transitioned from paper plans to EPR submissions, which has helped the HCD team save time as it eliminates the need for the physical transportation of plan documents between the offices of DBI located at 49 So. Van Ness and SFFD HCD located at 698 2nd St. The EPR digital platform allows for easy tracking and sharing of documents electronically, which is ideal when reviewing and comparing multiple revisions. EPR has allowed FIRE plan reviewers the ability to mark up and annotate plans electronically in real time, which can be viewed instantly by all parties involved. EPR streamlines the review process, making it more efficient and allowing for parallel review by all City agencies, if desired. As a result of unforeseen factors or practical limitations, the data in Exhibit E indicates that in some processes it may not work out as expected. Further review of the EPR inter-agency review process, use of EPR by the applicants, and City agencies review procedures should be performed to obtain even more favorable results using EPR.

While SFFD's HCD team consistently keeps housing projects flowing expeditiously, there are still interdepartmental processes needing improvement that negatively

affect the pace of plan approvals. These improvements include working with other City agencies on the following:

Department of Building Inspection

- 1) Identification of ED 17-02 permit applications at time of DBI intake.
- 2) Routing of plans, or emails with EPR links, from DBI permit processing directly to SFFD-HCD.
- 3) Requests for pre-application meetings specifying their project is an “100% Affordable Housing” project.

Housing Delivery Agency Project Managers

- 4) Provide SFFD-HCD with a list of housing project addresses.

Affordable Housing applications are often routed to the incorrect FIRE plan review team, which in turn causes delays in review times. During the intake process, consistent use of DBI-MIS division’s “flagging features” in the Permit Tracking System (PTS), would remedy this confusion. Applicants should be instructed to verify that flagging of their project’s plans is being performed when submitting their applications at DBI. This simple improvement could be implemented with additional training of intake attendants at DBI and reminders to the applicant.

SFFD’s HCD plan review team is officed at SFFD Headquarters (HQ), located at 698 2nd Street. Unfortunately, even with knowledge that FIRE’s HCD plan review team dedicated to affordable housing projects is located offsite at SFFD Headquarters, paper plans and EPR emails are still routed via normal DBI procedures to FIRE’s plan check team located at DBI (49 SVN). Additional time could be saved by eliminating the extra step it takes for housing plans to be discovered and rerouted by AFM Harold’s plan review team at 49 SVN to AMF Russell’s Housing team at 698 2nd St. A possible solution could be that EPR emails with project information would be sent directly to AFM Russell and paper plans could be directly deposited into a separate “HCD bin”, waiting for HCD’s retrieval after receiving a notification email. These are simple procedural changes that could be implemented with personnel notification and coordination with DBI staff.

When requesting a pre-application meeting for projects under an Executive Directive, the requesting party should always specify on their application that the project is a “100% Affordable Housing” project, or an “ADU” project. Because these are ED projects applicants should always ask upfront that their pre-app meeting request be forwarded to the SFFD Housing & Community Development team. Failure of the applicant to specify at time of request that the meeting is for an Executive Directive project currently causes the pre-application request to be routed via normal channels to AFM Harold’s plan review team at DBI first. Once the error is discovered, the reassignment of the meeting request causes further delays as it will then be re-routed to the HCD team to handle. Correcting this issue is simply another administrative fix that should take no longer than DBI issuing an internal informational memorandum

and reminding administrative staff to question the applicant if the pre-app meeting is for either an affordable housing project or an ADU. See DBI coordination proposals below.

Many housing projects are referenced by name and not the physical address of the project. Providing a list of incoming project addresses to the SFFD HCD coordinator from the housing delivery agency's project manager (PM), in addition to the project names, would serve as a way for FIRE to verify if a project was erroneously not flagged during DBI intake and should be routed to a different review team. Maintaining an updated project address list would assist in reducing delays in the routing of project plans to the appropriate plan review team. For optimum success the addresses should be provided to FIRE before the plans are submitted to DBI. See Housing Coordination Team coordination proposal below.

Through communication and cooperation with DBI and housing delivery agency project managers, all four of the above process improvements could be easily achieved by June 30, 2023.

5) Cooperation Proposals

In order to decrease our permit review times per ED 23-01, we propose to cooperate with the Department of Building Inspection (DBI) in order to create more formal efficiencies between our two departments. Cooperation requests will include the following:

- Immediate internal distribution of a DBI reminder memorandum for plan intake attendants on the importance of “flagging” Affordable Housing projects correctly, along with the need for them to remind applicants to request appropriate project documentation.
- All EPR emails with housing/ADU project information shall be sent directly to AFM Russell and ED paper plans received be deposited into a separate “FIRE HCD HOLD” bin while waiting for the HCD team's retrieval of the paper plans after receiving email notification.
- Immediate issuance of an internal DBI informational memorandum reminding DBI staff to always question if the pre-app meeting is for either “Affordable Housing” or “ADUs”.

Additionally, in order to decrease our permit review times per ED 23-01, we propose to cooperate with the Housing Coordination Team project managers in order to create more formal efficiencies between our departments. The cooperation request will be for the creation and maintenance of a shared spreadsheet that includes the physical street addresses for all Housing projects, in addition to their project names, to be available for all agencies.

6) Capacity Assessment and Plan:

The existing departmental capacity of the SFFD Housing & Community Development team dedicated to ED 17-02 is comprised of one Assistant Fire Marshal, one Lieutenant, one full-time Fire Protection Engineer, and one part time Fire Protection Engineer. While FIRE's primary plan review team at 49 SVN consists of approximately 17 members, including: inspectors, FPE's, and officers.

At present, the SFFD Housing & Community Development Team has been successful and efficient in meeting the housing productivity goal of 5,000 units per year with the current HCD team.

As housing production and the volume of housing permits routed to FIRE for plan review increase, the Fire Marshal shall add staff capacity as necessary to continue processing plans in a timely manner. A plan reviewer from a different FIRE plan review group may be temporarily reassigned to assist the HCD review team and, if necessary, after-hours plan review shall also an option on an as-needed basis.

While the current HCD staffing level is sufficient for Executive Directives 17-02 and 18-01, additional HCD team staffing will be needed to maintain the high-quality level of service and constant attention to the new ED 23-01 program. Hiring a new or reassigning a current Bureau of Fire Prevention Captain, a Fire Protection Engineer, and a fire plan reviewer would take approximately four weeks to complete. While an additional 2-3 weeks would be needed to train the new staff on procedures, duties, and quality of work expectations for the needed level of service.

In support of the 2023 Housing Element goals, improvements to the SFFD HCD team should be focused on expanding the team. Additional capacity will definitely be needed to meet the ambitious goal of 10,000 affordable housing units per year. We should always keep in mind that all future capacity needs to be flexible as the volume and types of housing permits will continuously fluctuate over time.

Exhibit A

SFFD Community Development Housing Production Flowchart

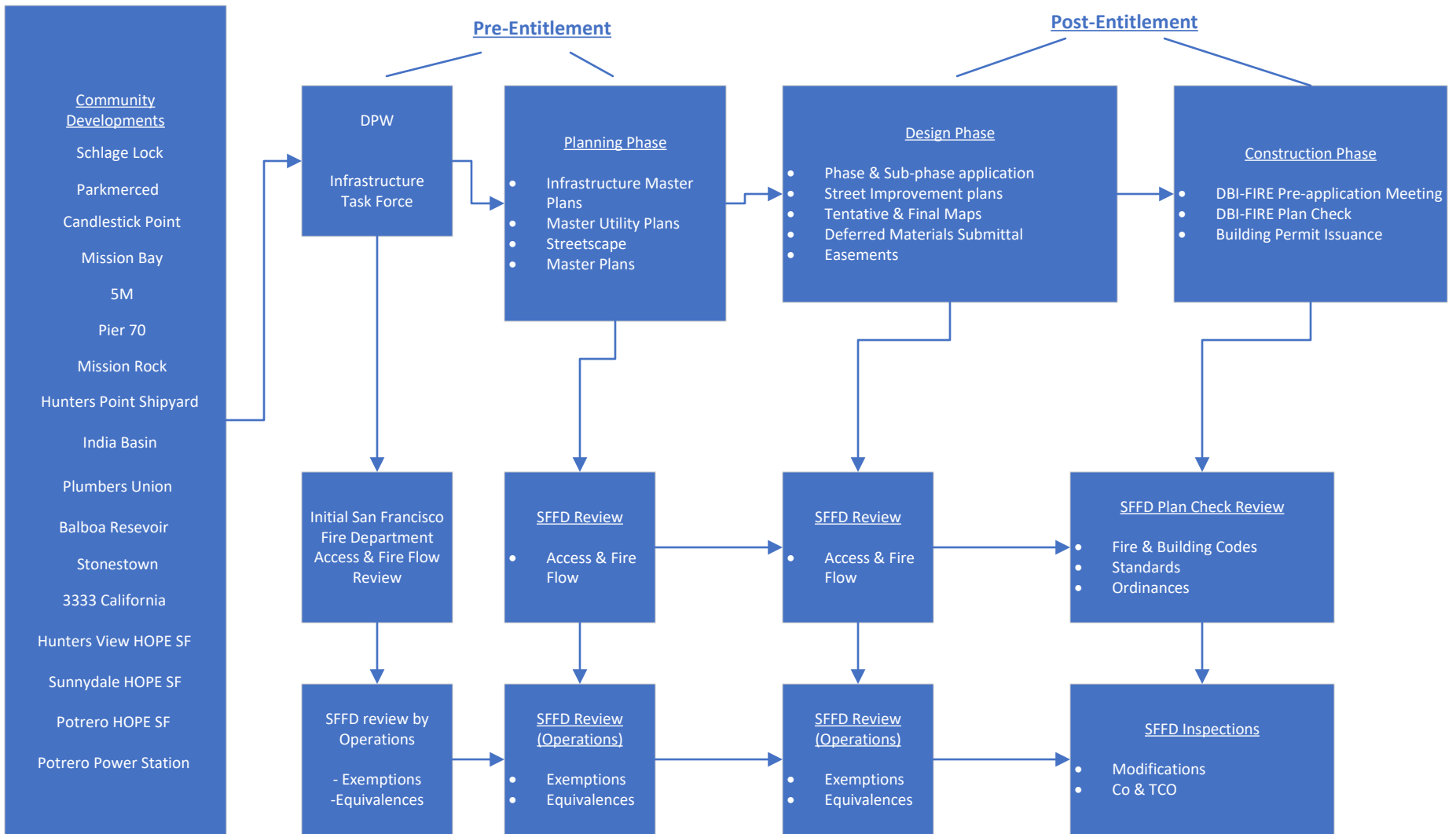
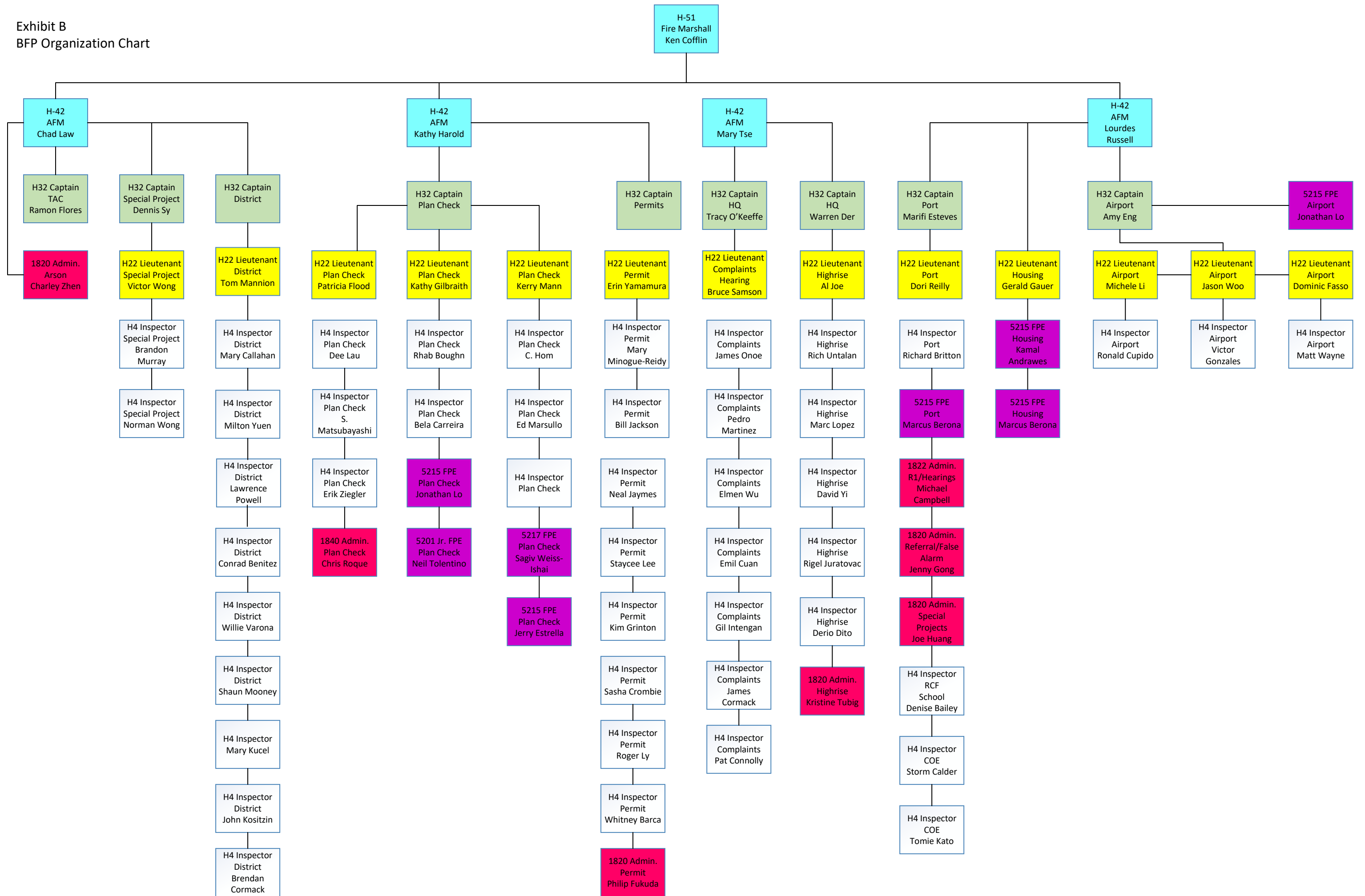


Exhibit B
BFP Organization Chart





**San Francisco Fire Department
Division of Fire Prevention & Investigation**

Daniel de Cossio, Fire Marshal

MEMORANDUM

TO: Executive Directive Housing Coordinator

FROM: Fire Marshal de Cossio

DATE: April 12, 2018

SUBJECT: Executive 17-02: Action Plan and Agreement

REFERENCE: Executive Directive 17-02

ENCLOSURES: None

The SFFD team tasked with design review of Large Community Development (LCD) projects will consist of two dedicated positions, a Captain and Fire Protection Engineer.

CAPTAIN

The captain will serve as the liaison between sister City agencies and will be the single point of contact for all LCD projects. The captain will be responsible for the end to end process, managing each project, horizontal through vertical development. The captain will be responsible for navigating each project, internally, through SFFD's Bureau of Fire Prevention, Support Services to Field Operations and will be responsible for monitoring progress of each design review and requesting additional resources as needed. In monitoring the progress of projects, the Captain will be responsible for conflict resolution, for both intra and inter departmental design conflicts, and when necessary, escalate unresolved issues to the Fire Marshal. The Captain will be supported by and supervise a dedicated Fire Protection Engineer.

FIRE PROTECTION ENGINEER

The Fire Protection Engineer (FPE) will be responsible for both horizontal and vertical design plan review. The horizontal design review will include review of street maps and site plans for Fire Department vehicle access (to project site), access to water supplies (both AWSS and LPWSS), and building access. The FPE will be the lead plan reviewer for the vertical design. He/she will be responsible for Architectural Review and will seek additional resources, through the Captain, as needed for review of all life-safety and fire protection design disciplines. All review comments will be routed through the lead FPE and forwarded to the Captain.

Exhibit D – Average Timeframes for Plan Review and Approval

Name (Reviewer): Average times for FPE Andrawes, FPE Berona, Lt. Gauer, and Lt. Woo

	<u>Average Completed SFFD Review Time (days)</u>	<u>Average Time from SFFD Comments to Designer Response (Days)</u>	<u>Average Time from Designer Response to 2nd SFFD Response (Days)</u>	<u>*Average Time from First Designer Response to SFFD Approval (Days)</u>	<u>Average Total Days from Plans Received to SFFD Final Approval</u>
Site (Horizontal Design Review)					
Paper	28	105	9	60	193
EPR	20	59	5	152	231
Architectural/MEP					
Paper	26	50	10	60	136
EPR	21	64	6	216	301
Fire Alarm					
Paper	25	33	9	30	88
EPR	13	58	7	68	71
Fire Sprinkler					
Paper	15	48	10	123	186
EPR	12	67	6	106	185

Solar

Paper	14	15	7	86	115
EPR	11	0	5	184	195

	<u>Average Completed SFFD Review Time (days)</u>	<u>Average Time from SFFD Comments to Designer Response (Days)</u>	<u>Average Time from Designer Response to 2nd SFFD Response (Days)</u>	<u>*Average Time from First Designer Response to SFFD Approval (Days)</u>	<u>Average Total Days from Plans Received to SFFD Final Approval</u>
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ERRCS

Paper	12	5	9	16	33
EPR	6	30	6	25	60

ADUs

Paper	2	87	5	1	90
EPR	2	157	3	51	208

Steel Stairs

Paper	10	0	0	0	10
EPR	5	0	0	150	155

Signage

Paper	7	3	3	68	77
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Emergency Generator/Fuel piping

EPR	8	160	7	61	229
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Exterior Building Maintenance Systems

Paper	2	63	0	303	368
EPR	2	31	0	7	40

	<u>Average Completed SFFD Review Time (days)</u>	<u>Average Time from SFFD Comments to Designer Response (Days)</u>	<u>Average Time from Designer Response to 2nd SFFD Response (Days)</u>	<u>*Average Time from First Designer Response to SFFD Approval (Days)</u>	<u>Average Total Days from Plans Received to SFFD Final Approval</u>
Underground					
Paper	7	0	0	0	7
EPR	4	0	0	1	5

***Average includes numerous reviews between designer and FIRE to approval.**