

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Cc:** [Calvillo, Angela \(BOS\)](#); [Mchugh, Eileen \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [Ng, Wilson \(BOS\)](#); [Laxamana, Junko \(BOS\)](#); [Major, Erica \(BOS\)](#)  
**Subject:** FW: Record No. 2021-001791PCA, File No. 210116: Legislative Section 319 Review of Large Residence Developments  
**Date:** Thursday, July 8, 2021 9:22:20 AM

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**From:** Howard Blecher <howard@bbudesign.com>  
**Sent:** Wednesday, July 7, 2021 9:06 AM  
**To:** Merlone, Audrey (CPC) <audrey.merlone@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Subject:** Record No. 2021-001791PCA, File No. 210116: Legislative Section 319 Review of Large Residence Developments

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In response to 'large developments' Supervisor Mandelman has developed a new **Legislative Section 319 Large Residence Developments** that states, "The purpose of this Section 319 is to protect and enhance existing neighborhood character, encourage new infill housing at compatible densities and scale, and provide for thorough assessment of proposed large single-family residences that could adversely impact neighborhood character and affordable housing opportunities."

It will require all RH properties to get a Conditional Use Authorization for any unit with a gross sf over 2,500sf, and for any expansion 10% of the gross sf of all development done in the last 10 years.

I am not supporting this legislation based on the negative impact it will have

1. It adversely changes the intent of zoning laws that typically use form-based regulations, i.e yards, setbacks, and height limitations to determine what can be developed allowing for the variety of lot conditions and sizes to create a rich diverse urban fabric.
2. It will add time and expense.
3. It will add workload for Planning Staff and Commissioners to a system overburdened with Conditional Use Authorizations.
4. It will not encourage density or create affordable housing.
5. It will not discourage large construction.

I propose these alternative suggestions to address Mandelman's concerns

1. Change the definition of area used in calculations to exclude the square footage of unoccupied ground floor and attic spaces, exterior walls, parking, and mechanical rooms.
2. Allow units to expand without CUA on a sliding scale proportional to their current size:

- · Eliminate expansion limits resulting in units equal to or less than 3,000 sf .
- · Allow 50% expansion of units between 3,001 – 3,500 sf
- · Allow 25% expansion between 3,501 – 4,000 sf
- · Allow 15% expansion between 4,001 – 4,500 sf
- · Allow 10% between 4,501 sf and over

3. Do not include in the calculation of allowable % increases “all development performed on the lot within the last 10 years” before these restrictions even existed.

4. Do not include in the regulations and criteria for Findings for a CUA criteria that are already regulated by Planning in existing regulations and processes

5. Grandfathering: Change the applicability of the ordinance to instances where a complete Development Application is submitted after *the effective date of the legislation* rather than the date legislation was introduced (February 2, 2021).

**I support efforts to:**

1. Allow housing to adapt to accommodate the diverse community that occupies the Bay Area
2. Provide life and health safety measure and seismic upgrades
3. Adapt Sustainability and Energy Conservation methods
4. Encourage up-zoning to allow for density

Best regards,  
Howard Blecher

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Howard Blecher, Architect, NCARB, M.C.P., Certified GreenPoint Rater, LEED AP  
Blecher Building + Urban Design  
3343 22nd Street  
San Francisco, CA 94110  
M 415-364-8478  
M 917-613-5816  
[howard@bbudesign.com](mailto:howard@bbudesign.com)  
[www.bbudesign.com](http://www.bbudesign.com)



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