File No. 250966 **Committee Item No.** 5
Board Item No. 11

COMMITTEE/BOARD OF SUPERVISORS

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Committee: Land Use and Transportation **Date:** Dec. 1, 2025
Board of Supervisors Meeting: **Date:** Dec. 9, 2025

Cmte Board

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Prepared by: John Carroll **Date:** Nov. 26, 2025
Prepared by: Erica Major **Date:** Dec. 2, 2025
Prepared by: John Carroll **Date:** Dec. 5, 2025

[General Plan Amendments - Family Zoning Plan]

Ordinance amending the General Plan to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; amending the City's Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 340.

NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.
Additions to Codes are in *single-underline italics Times New Roman font*.
Deletions to Codes are in ~~*strikethrough italics Times New Roman font*~~.
Board amendment additions are in double-underlined Arial font.
Board amendment deletions are in ~~strikethrough Arial font~~.
Asterisks (* * * *) indicate the omission of unchanged Code subsections or parts of tables.

Be it ordained by the People of the City and County of San Francisco:

Section 1. Environmental and Land Use Findings.

(a) On November 17, 2022, the Planning Commission, in Motion M-21206 certified the Final Environmental Impact Report (EIR) for the Housing Element 2022 Update (2022 Housing Element) of the San Francisco General Plan (Housing Element EIR), as in compliance with the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.), the CEQA Guidelines (14 Cal. Code Regs. Section 15000 et seq.), and Chapter 31 of the San Francisco Administrative Code. Copies of the Planning Commission Motion No. M-21206 and Housing Element EIR are on file with the Clerk of the Board of Supervisors in File No. 230001.

(b) On December 15, 2022, at a duly noticed public hearing, the Planning Commission adopted findings under CEQA regarding the 2022 Housing Element's environmental impacts, mitigation measures, and project alternatives, as well as a statement of overriding considerations (CEQA Findings), and adopted a mitigation monitoring and reporting program (MMRP), by Resolution No. 21220.

(c) The Planning Commission then adopted the proposed 2022 Housing Element in Resolution No. 21221, finding in accordance with Planning Code Section 340 that the public necessity, convenience, and general welfare required the proposed amendments to the General Plan.

(d) On January 31, 2023, in Ordinance 010-23, the Board of Supervisors adopted the 2022 Housing Element. That ordinance confirmed the certification of the Housing Element EIR and made certain environmental findings, including adoption of the MMRP and a Statement of Overriding Considerations.

(e) On September 3, 2025, the Planning Department published an addendum to the Housing Element EIR, which concluded that no supplemental or subsequent environmental review is required for the Family Housing Rezoning Program, which includes Planning Code and Zoning Map amendments, as well as these General Plan Amendments, because the

environmental impacts of these amendments were adequately identified and analyzed under CEQA in the Housing Element EIR, and the proposed amendments would not result in any new or more severe environmental impacts than were identified previously. The Addendum is on file with the Clerk of the Board of Supervisors in File No. 250966.

(f) The Board of Supervisors has reviewed and considered the Housing Element EIR and the Addendum, and concurs with the Planning Department's analysis and conclusions, finding that the addendum adequately identified and analyzed the environmental impacts of the Family Housing Rezoning Program, and that no additional environmental review is required under CEQA Section 21166 and CEQA Guideline Sections 15162-15164 for the following reasons:

(1) the Family Housing Rezoning Program would not involve new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Housing Element EIR;

(2) no substantial changes have occurred that would require major revisions to the Final EIR due to the involvement of new environmental effects or a substantial increase in the severity of effects identified in the Housing Element EIR; and

(3) no new information of substantial importance has become available which would indicate that (i) the Family Housing Rezoning Program will have significant effects not discussed in the Final EIR; (ii) significant environmental effects will be substantially more severe; (iii) mitigation measure or alternatives found not feasible that would reduce one or more significant effects have become feasible, or (iv) mitigation measures or alternatives that are considerably different from those in the Housing Element EIR would substantially reduce one or more significant effects on the environment.

(g) The Planning Department has determined that the amendments to the Local Coastal Program are exempt from CEQA review under Public Resources Code Sections

21080.5 and 21080.9, and CEQA Guidelines Section 15265. Said determination is on file with the Clerk of the Board of Supervisors in File No. _____. The Board affirms this determination and incorporates the determination by reference.

(h) Under Charter Section 4.105 and Planning Code Section 340, any amendments to the General Plan shall first be considered by the Planning Commission and thereafter recommended for approval or rejection by the Board of Supervisors.

(i) After a duly noticed public hearing on July 17, 2025, in Resolution No. 21784, the Planning Commission initiated amendments to the General Plan. A copy of Planning Commission Resolution No. 21784 is on file with the Clerk of the Board of Supervisors in File No. 250966 and is incorporated herein by reference.

(j) On September 11, 2025, the Planning Commission conducted a duly noticed public hearing on the General Plan Amendments pursuant to Planning Code Section 340, and, by Resolution No. 21808, found both that the actions contemplated in this ordinance are consistent, on balance, with the City's General Plan and the eight priority policies of Planning Code Section 101.1, and that the public necessity, convenience, and general welfare require the proposed General Plan Amendments. The Planning Commission adopted the General Plan Amendments and recommended them for approval to the Board of Supervisors. The Board adopts the findings in Planning Commission Resolution No. 21808 as its own. A copy of Planning Commission Resolution No. 21808 is on file with the Clerk of the Board of Supervisors in File No. 250966 and is incorporated herein by reference.

(k) The Board of Supervisors finds that the General Plan amendments in this ordinance (specifically, the amendments to the Western Shoreline Area Plan) constitute amendments to the certified Land Use Plan of the City's Local Coastal Program (LCP). The Board of Supervisors finds that the LCP amendments meet the requirements of, and are in conformity with, the policies of Chapter 3 of the Coastal Act (California Public Resources

Code Section 30200 et seq.). The Board further finds that the LCP amendments will be implemented in full conformance with the Coastal Act's provisions, and acknowledges that the amendments to the Western Shoreline Area Plan are consistent with San Francisco's Housing Element's housing goals.

(l) The Board of Supervisors finds that promoting higher-density housing opportunities in the Coastal Zone is consistent with the Coastal Act's goal of providing "new affordable housing opportunities for persons of low and moderate income in the coastal zone." (Cal. Pub. Resources Code Section 30604(g).) Further, providing these opportunities in the Coastal Zone is consistent with the Housing Element's goal of creating new housing in well-resourced neighborhoods.

Section 2. Additional Findings.

(a) Under State law, every city and county must have a general plan, and each general plan must include a housing element. State law requires that a housing element identify and analyze the jurisdiction's existing and projected housing needs, include a statement of goals, policies and objectives for the preservation, improvement, and development of housing, and identify adequate sites for housing for all economic segments of the community. (California Government Code Section 65583.) The City adopted the 2022 Housing Element on January 31, 2023.

(b) A jurisdiction's existing and projected housing needs is known as its Regional Housing Needs Allocation (RHNA). If a jurisdiction does not have sufficient sites to accommodate its RHNA, it must adopt zoning changes, generally within three years of housing element adoption. San Francisco's RHNA is approximately 82,000 units, and because the City does not have sufficient capacity to accommodate its RHNA, it must rezone sufficient sites to allow for additional units by January 31, 2026. State Housing Element law

also mandates that jurisdictions affirmatively further fair housing, in part by providing housing opportunities in "well-resourced areas," a state law designation that takes into consideration access to amenities such as good schools, jobs, transportation, and open space, and lower rates of poverty.

(c) This ordinance amends various elements and area plans in the San Francisco General Plan, consistent with the 2022 Housing Element. This ordinance is part of a package of ordinances that will implement the Family Zoning Plan. The Family Zoning Plan includes this ordinance amending the General Plan, as well as a Planning Code and Business and Tax Regulations Code amendment (found in Board File 250701) and a Zoning Map amendment (found in Board File 250700). Together, the three ordinances implement goals found in the 2022 Housing Element to accommodate the City's RHNA. The ordinances satisfy the City's obligation to rezone and address the RHNA shortfall of 36,200 housing units.

(d) Among other aspects, the ordinances: (1) create the Housing Choice-San Francisco program, which includes a local residential bonus program and a Housing Sustainability District; (2) amends to San Francisco's height and bulk requirements in well-resourced areas, primarily by increasing heights along certain corridors to allow for mid-rise development (65 feet, or six to eight stories); (3) removes density limits and institutes form-based density in residential areas surrounding major transit and commercial streets; and (4) makes various other changes to the Planning Code to concentrate new housing on major transit routes, commercial streets, and other hubs of activity in the City's well-resourced neighborhoods.

Section 3. The General Plan is hereby amended by revising the Urban Design Element, to read as follows:

(a) Map 4, “Urban Design Guidelines for Height of Buildings” is hereby removed and replaced with the map entitled “Urban Design Guidelines for Height of Buildings” on file with the Clerk of the Board in File No. 250966.

(b) Map 5, “Urban Design Guidelines for Bulk of Buildings” is hereby removed from the Urban Design Element.

(c) The Urban Design Element is further revised, to read as follows:

Urban Design Element

* * * *

City Pattern

* * * *

OBJECTIVE 1

EMPHASIS OF THE CHARACTERISTIC PATTERN WHICH GIVES TO THE CITY AND ITS NEIGHBORHOODS AN IMAGE, A SENSE OF PURPOSE, AND A MEANS OF ORIENTATION.

* * * *

Principles for City Pattern

These fundamental principles and their illustrations reflect the needs and characteristics with which this plan is concerned, and describe measurable and critical urban design relationships in the city pattern.

* * * *		
2.	Street layouts and building forms which do not emphasize topography reduce the clarity of the city form and image.	* * * *

	A: Tall, slender buildings at the tops of hills and low*er* buildings on the slopes and in valleys accentuate the form of the hills. B: Contour streets on hills align buildings to create a pattern of strong horizontal bands that conflict with the hill form.	
* * * *		

Image and Character

POLICY 1.1

Recognize and protect major views in the city, with particular attention to those of open space and water.

Views contribute immeasurably to the quality of the city and to the lives of its residents. ~~*Protection*~~ *Special consideration* should be given to major views whenever it is feasible, with special attention to the characteristic views of open space and water that reflect the natural setting of the city and give a colorful and refreshing contrast to man's development.

Overlooks and other viewpoints for appreciation of the city and its environs should be protected and supplemented, by limitation of buildings and other obstructions where necessary and by establishment of new viewpoints at key locations.

Visibility of open spaces, especially those on hilltops, should be maintained and improved, in order to enhance the overall form of the city, contribute to the distinctiveness of districts and permit easy identification of recreational resources. The landscaping at such locations also provides a pleasant focus for views along streets.

* * * *

Conservation

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OBJECTIVE 2

CONSERVATION OF RESOURCES WHICH PROVIDE A SENSE OF NATURE, CONTINUITY WITH THE PAST, AND FREEDOM FROM OVERCROWDING.

If San Francisco is to retain its charm and human proportion, certain irreplaceable resources must not be lost or diminished. Natural areas must be kept undeveloped for the enjoyment of future generations. ~~*Past development, as represented both by distinctive buildings and by areas of established character, must be preserved.*~~ *Special care should be taken to recognize, express and, in some cases, maintain, the distinctive character of individual neighborhoods, as well as notable buildings, recognizing that accommodating new buildings that are taller or denser than adjacent existing buildings is necessary to meet the evolving needs of the city and its population.* Street space must be retained as valuable public open space in the tight-knit fabric of the city.

* * * *

Richness of Past Development

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POLICY 2.7

Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character.

* * * *

These areas do not have buildings of uniform age and distinction, or individual features that can be readily singled out for preservation. It is the combination and eloquent interplay of buildings, landscaping, topography and other attributes that makes them outstanding. ~~*For that reason, special review of building proposals may be required to assure consistency with the basic character and scale of the area.*~~ Furthermore, the participation of neighborhood associations in these areas in a cooperative effort to maintain the established character, beyond the scope of public regulation, is essential to the long-term image of the areas and the city.

* * * *

Major New Development

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OBJECTIVE 3

MODERATION OF MAJOR NEW DEVELOPMENT TO COMPLEMENT THE CITY PATTERN, THE RESOURCES TO BE CONSERVED, AND THE NEIGHBORHOOD ENVIRONMENT.

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Visual Harmony

POLICY 3.1

Promote harmony in the visual relationships and transitions between new and older buildings.

New buildings should be made sympathetic to the scale, form and proportion of older development. This can often be done by repeating existing building lines and surface treatment. Where new buildings reach exceptional height and bulk, large surfaces should be articulated and textured to reduce their apparent size and to reflect the pattern of older buildings.

Although contrasts and juxtapositions at the edges of districts of different scale are sometimes pleasing, the transitions between such districts should generally be gradual in order to make the city's larger pattern visible and avoid overwhelming of the district of smaller scale. In transitions between districts and between properties, especially in areas of high intensity, the lower portions of buildings should be designed to promote easy circulation, good access to transit, good relationships among open spaces and maximum penetration of sunlight to the ground level.

In new, high-density residential areas ~~*near*~~*outside of the* downtown *core* where towers are being contemplated as part of comprehensive neighborhood planning efforts, ~~*such as Transbay and Rincon Hill,*~~ such towers should be slender and widely spaced among buildings of lesser height to allow ample sunlight, sky exposure and views to streets and public spaces. It is thus to be expected that some tall buildings will be located adjacent to buildings of significantly lower height. This, does not in itself, create disharmony or poor transitions, but is in fact necessary in order to achieve important neighborhood-wide livability goals. Because these areas are ~~*on the edges*~~ *outside* of the downtown *core*, stricter standards than exist in the downtown core for tower bulk and spacing should be established to minimize the bulk of towers and set minimum tower spacing. It is especially important that towers have active ground floors and that lower stories are highly articulated *at and below the podium height* and engage the pedestrian realm, with multiple building entrances, townhouses, retail, and neighborhood services. (See Map 4.)

* * * *

Height and Bulk

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POLICY 3.5

Relate the height of buildings to important attributes of the city pattern and to the height and expression of existing development.

The height of new buildings should take into account the guidelines expressed in this Plan. These guidelines are intended to promote the objectives, principles and policies of the Plan, and especially to complement the established city pattern. They weigh and apply many factors affecting building height, recognizing the special nature of each topographic and development situation.

MAP 4 - Urban Design Guidelines for Height of Buildings

Tall, slender buildings should occur on many of the city's hilltops to emphasize the hill form and safeguard views, while buildings of smaller scale should occur at the base of hills and in the valleys between hills. In other cases, especially where the hills are capped by open spaces and where existing hilltop development is low and small-scaled, new buildings should remain low in order to conserve the natural shape of the hill and maintain views to and from the open space. Views along streets and from major roadways should be protected. The heights of buildings should taper down to the shoreline of the Bay and Ocean, following the characteristic pattern and preserving topography and views.

Tall buildings should be clustered downtown and at other centers of activity to promote the efficiency of commerce, to mark important transit facilities and access points and to avoid unnecessary encroachment upon other areas of the city. Such buildings should also occur at points of high accessibility, such as rapid transit stations in larger commercial areas and in areas that are within walking distance of the downtown's major centers of employment. In these areas, building height should taper down toward the edges to provide gradual transitions to other areas.

In areas of growth where tall buildings are considered through comprehensive planning efforts, such tall buildings should be grouped and sculpted to form discrete skyline forms that do not muddle the clarity and identity of the city's characteristic hills and skyline. Where multiple tall buildings are contemplated in areas of flat topography near other strong skyline forms, such as on the southern edge of the downtown "mound," they should be adequately spaced and slender to ensure that they are set apart from the overall physical form of the downtown and allow some views of the city, hills, the Bay Bridge, and other elements to permeate through the district.

The city's downtown skyline should be crafted to resemble a distinct and elegant hill form with the tallest and most prominent building rising as it's "crown." As the geographic

epicenter of downtown, as well as the front door of the Transbay Transit Center, the "Transit Tower" should be the tallest building in the city's skyline. The Transit Tower represents the City's commitment to focusing growth around a sustainable transportation hub, as well as the apex of the downtown skyline. The Transit Center District Sub-Area Plan contains specific details related to urban form and design for this area.

The prevailing height limits for the "fabric" of most residential neighborhoods in the City should generally range from four to six stories dependent on location. Parcels lining commercial and transit corridors and in denser mixed-use areas should generally be permitted at a minimum of six to eight stories. Parcels with certain conditions may warrant buildings at the higher ends of these ranges, such as wider streets, proximity to more significant transit infrastructure, being located on a corner, being larger than standard sized parcels, or other conditions. Buildings taller than eight stories should be considered ~~*In residential and smaller commercial areas, tall buildings should occur*~~ along *segments of certain major* transit corridors*, the intersection of major corridors,* and closest to major centers of employment and community services which themselves produce significant building height, and at locations where more height will encourage social and commercial activity and achieve visual interest consistent with other neighborhood considerations. At outlying and other prominent locations, the point tower form (slender in shape with a high ratio of height to width) should be used in order to avoid interruption of views, casting of extensive shadows or other negative effects. In all cases, the height and expression of existing development should be considered.

The guidelines in this Plan express ranges of height that are to be used as an urban design evaluation for the future establishment of specific height limits affecting both public and private buildings. For any given location, urban design considerations indicate the appropriateness of a height coming within the range indicated. The guidelines are not height limits, and do not have the direct effect of regulating construction in the city.

POLICY 3.6

Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.

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~~***MAP 5 - Urban Design Guidelines for Bulk of Buildings***~~

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Section 4. The General Plan is hereby amended by revising the Commerce and Industry Element, to read as follows:

* * * *

Neighborhood Commerce

OBJECTIVE 6

MAINTAIN AND STRENGTHEN VIABLE NEIGHBORHOOD COMMERCIAL AREAS EASILY ACCESSIBLE TO CITY RESIDENTS.

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POLICY 6.7

Promote high quality urban design on commercial streets.

Most of San Francisco's neighborhood commercial districts were developed concurrently with residential development and have physical forms which relate to the needs and tastes prevalent during the first half of this century. During this period, commercial units were built along streetcar lines and at major street intersections, often with residential flats on the upper floors, thus creating the familiar "linear" or "strip" commercial districts.

The small lot pattern prevalent at that time also encouraged the development of small buildings and stores. The resulting scale has come to characterize San Francisco's attractive

and active neighborhood commercial districts. The ~~*small-scale*~~ *intricate* character should be maintained through the regulation of the size of new buildings and commercial uses.

Continuous commercial frontage at the street level is especially important in all but the lowest intensity commercial districts with limited market areas. It prevents the fragmentation and isolation of fringe areas, improves pedestrian accessibility, and enhances the physical and aesthetic cohesiveness of the district. The design of new buildings should harmonize with the scale and orientation of existing buildings. Additionally, a correspondence of building setbacks, proportions, and texture helps establish visual coherence between new development and existing structures on a commercial street.

The appeal and vitality of a neighborhood commercial district depends largely on the character, amenities, and visual quality of its streets. The main function of neighborhood commercial streets is to provide retail goods and services in a safe, comfortable, and attractive pedestrian environment.

* * * *

Urban Design Guidelines

* * * *

Scale, Height and Bulk

- In most cases, small lots with narrow building fronts should be maintained in districts with this traditional pattern.
- When new buildings are constructed on large lots, the facades should be designed in a series of elements which are compatible with the existing scale of the district.
- The height of a proposed development should ~~*relate*~~ *be considered relative* to the ~~*individual neighborhood character and the height and*~~ scale of ~~*adjacent buildings*~~ *the neighborhood. Design strategies should be employed to break down*

the scale of new larger structures, including building massing and articulation strategies, to avoid an overwhelming or dominating appearance of new structures. ~~*On a street of varied building heights, transitions between high and low buildings should be provided. While three-and four-story buildings are appropriate in many locations, two-story buildings are more appropriate in some areas with lower-scale development.*~~

- The height and bulk of new development should be designed to maximize sun access to nearby residential open space, parks, plazas, and major pedestrian corridors.

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Section 5. The General Plan is hereby amended by revising the Transportation Element, to read as follows:

Transportation Element

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OBJECTIVES & POLICIES

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Citywide Parking

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OBJECTIVE 36

RELATE THE AMOUNT OF PARKING IN RESIDENTIAL AREAS AND NEIGHBORHOOD COMMERCIAL DISTRICTS TO THE CAPACITY OF THE CITY'S STREET SYSTEM AND LAND USE PATTERNS.

* * * *

POLICY 36.3

~~***Permit minimal or reduced off-street parking supply for new buildings in residential and commercial areas adjacent to transit centers and along transit preferential streets.***~~

~~*Where there is a high concentration of transit service, as in the northeastern portions of the city, census tract figures indicate that residents are less likely to own automobiles and more likely to use public transit. High-density housing and housing for the elderly are already eligible for reductions in the standard provisions for off-street parking, enabling the building sponsors to build more economically. These buildings should be encouraged where transit service is plentiful and comprehensive.*~~

Set maximum parking limits for off-street parking in new buildings commensurate with the level of public transit access and in consideration of the land use density and mix of uses.

In order to facilitate an appropriate density of housing, commercial activity, and other uses, to encourage travel by modes other than single-occupant automobiles, and to reduce the cost of building new housing and other uses, San Francisco does not have minimum off-street automobile parking requirements for any uses citywide, and sets maximum limits for new development, generally expressed as a maximum ratio of parking spaces per unit or square footage of non-residential use. Lower maximum limits should be set for areas in close proximity to high frequency and high capacity transit, such as local (e.g. Muni Metro) and regional (e.g. BART, Caltrain) rail stations and high quality rapid bus services, such as bus rapid transit. Higher density and mixed use areas with better transit service, such as areas crossed by multiple bus lines, should also be considered for lower parking limits. Maintaining these parking maximums is critical to reducing the cost of housing, controlling traffic congestion, limiting environmental impacts of vehicular travel (e.g. greenhouse gas emissions), and improving street safety for pedestrians and other vulnerable road users, and maximizing efficient use of major public investment in transit infrastructure and services by encouraging transit ridership.

* * * *

Section 6. The General Plan is hereby amended by revising the Balboa Park Station Area Plan, to read as follows:

(a) The map, "Height Districts" is hereby removed from the Balboa Park Station Area Plan.

(b) The Balboa Park Station Area Plan is further revised, to read as follows:

Balboa Park Station Area Plan

* * * *

4. HOUSING

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OBJECTIVE 4.2

STRENGTHEN THE OCEAN AVENUE NEIGHBORHOOD COMMERCIAL DISTRICT BY PROVIDING AN APPROPRIATE MIX OF HOUSING.

* * * *

POLICY 4.2.1

Encourage mixed-use commercial and residential infill within the commercial district while maintaining the district's existing fine-grained character.

Over time there will be opportunities to replace some existing structures in the commercial district. Infill on these parcels with mixed-use developments ~~*containing up to three floors of housing,*~~ and retail space on the ground floor should be encouraged. ~~*To retain the district's fine-grained character, consolidation or mergers of more than one parcel should be prohibited. An exception to this rule should be made for mergers where a corner parcel would be consolidated with one adjacent parcel. These mergers would allow slightly larger structures to be developed on corners, which would allow more housing units to be developed with access to parking from the side street.*~~ *The size, scale, and design of new developments should consider and incorporate the district's fine-grained character.*

* * * *

6. BUILT FORM

* * * *

Balboa Park Station Area Plan

Urban Design Principles

* * * *

(1) **Massing and Articulation**

* * * *

- ~~*Significant parcel consolidation is prohibited on Ocean Avenue to preserve the fine-grained scale of the neighborhood. No parcel consolidation will be permitted that increases the frontage width on Ocean Avenue between Manor and Delano. The neighborhood is built on a traditional fabric of lots that are narrow and deep, which provides for an enriching block face, diversity of buildings, and stimulating pedestrian experience. Exceptions may be allowed where such merger would create corner parcels, such that off street parking can be accessed from a side street.*~~
- ~~*All buildings of 85 feet in height or lower must have a maximum horizontal plan dimension of 110 feet, with a maximum diagonal of 125 feet.*~~ The form of new buildings must consider the proportions and massing of other residential and street-front commercial buildings found throughout San Francisco, which are typically based on 25-foot wide building increments for row houses and neighborhood retail frontages, and that generally do not exceed 75 feet in width for larger apartment or office buildings. Efforts should be made to integrate the building into the overall scale of the streetwall. Many of the development parcels in the plan area are wider than the traditional 25-foot lot pattern, and care must be taken to create a fine-grained human scale. Individual buildings should maintain an expression of

architectural unity, even for larger buildings~~, *within the 110 foot maximum dimension*~~.

There must be a qualitatively different expression of buildings between adjacent structures.

These modulation and articulation increments are based on the walking speed of the average person and the need to experience diversity in the street front every ten to twenty paces.

* * * *

~~***MAP - Height Districts***~~

* * * *

Section 7. The General Plan is hereby amended by revising the Glen Park Community Plan, to read as follows:

(a) Map 3, "Existing and Proposed Heights" is hereby removed from the Glen Park Community Plan.

(b) The Glen Park Community Plan is further revised, to read as follows:

Glen Park Community Plan

* * * *

Land Use & Urban Design

* * * *

OBJECTIVE 1

PROTECT AND STRENGTHEN THE QUALITIES THAT MAKE DOWNTOWN GLEN PARK SPECIAL

* * * *

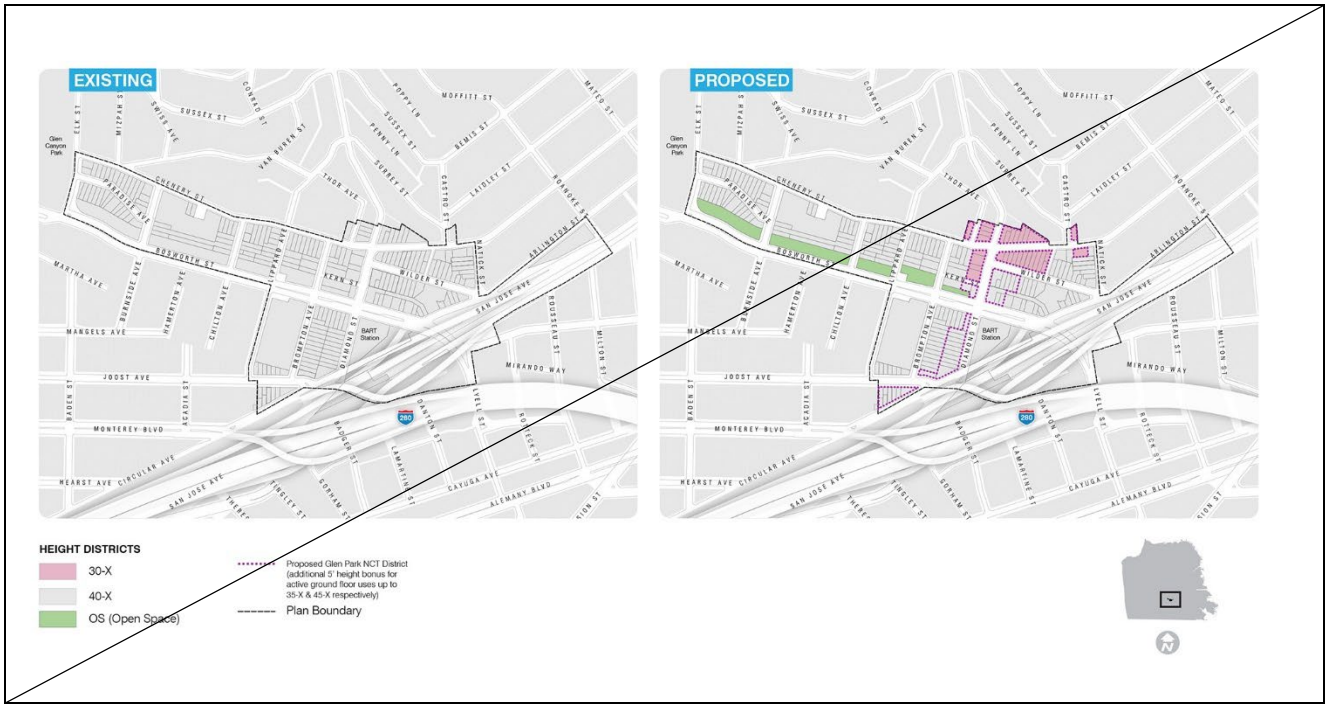
POLICY 1.5

In the *~~more sensitive~~* interior of Glen Park village, building*s* *~~heights~~* should *~~be reduced to respond to the prevailing pattern found there~~* *reinforce the existing character of the neighborhood*.

The interior of Glen Park village is characterized by *~~two and three-story~~* *smaller* buildings. This fine-grained pattern helps create an intimacy and a comfortable pedestrian environment. *~~A revision to the area's height district that reduces the maximum height of new construction on certain blocks should be carried out to reflect the established pattern.~~*

* * * *

Heights



~~MAP 3 - Existing and Proposed Heights~~

~~EXISTING HEIGHTS~~

~~Currently, all of Glen Park and its surrounding area are located within a 40' height district. This typically allows up to four stories of development.~~

~~PROPOSED HEIGHTS~~

~~*The fine-grained interior of Glen Park village is characterized by two and three-story buildings. These help create a comfortable pedestrian environment and define the street.*~~

~~*The Plan proposes reducing the maximum height of new development within the interior of the "village" from 40' to 30' in acknowledgement of the existing pattern.*~~

~~*Taller storefronts are also encouraged. A five foot height bonus is allowed for active ground floor uses within the Glen Park NCT District. This would permit maximum building heights of 35' and 45' depending on location (see Map above).*~~

OBJECTIVE 2

ENSURE THE COMPATIBILITY OF NEW DEVELOPMENT WITH THE FORM AND CHARACTER OF GLEN PARK

* * * *

POLICY 2.4

Design of new buildings should be consistent with the neighborhood's existing pattern.

New buildings or major renovations should reinforce the character of Glen Park by creating attractive, pedestrian-friendly places to live, visit and shop. Infill development should follow existing design guidelines and be consistent with the intent and policies of the Plan particularly in relation to scale, height, bulk, materials and details.

~~*The height of p*~~P<u></u>roposed development should relate to neighborhood character. Setbacks of facades may be appropriate to avoid an overwhelming appearance of new structures. Human-scaled buildings should be designed to be built close to the sidewalk, have active ground floors, use high-quality materials, and contain interesting features. Long blank monotonous walls or highly visible parking entrances should be avoided.

* * * *

Implementation Program

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Project	Action	Key Agency	Timeframe	Potential Funding Source
LAND USE & URBAN DESIGN				
Revised Neighborhood Commercial Zoning	Update Planning Code to reflect zoning change of existing neighborhood commercial district (NC-2) to Glen Park Neighborhood Commercial Transit (NCT) district	Planning	Upon Plan adoption	Planning Department
~~*Height District Revisions*~~	~~*Reduce maximum building heights for new construction on portions of Diamond, Wilder and Chenery Streets from 40-X to 35-X. Allow additional 5' height (45-X) on portions of Bosworth, Diamond, Joost Ave and Monterey Blvd for taller ground floor storefronts*~~	~~*Planning*~~	~~*Upon Plan adoption*~~	~~*Planning Department*~~
Streetscape Improvements	Develop streetscape strategy for core village area to include some or all of the following benches, new bus shelters, newsrack consolidation, bulbouts, possible sidewalk widening, utility undergrounding and street tree planting.	Planning, BART, SFMTA, DPW	Ongoing	Grants
* * * *				

* * * *

Section 8. The General Plan is hereby amended by revising the NorthEastern Waterfront Area Plan, to read as follows:

(a) Map 2, "Height and Bulk Plan" is hereby removed from the Northeast Waterfront Area Plan.

(b) The NorthEastern Waterfront Area Plan is further revised, to read as follows:

NorthEastern Waterfront Area Plan

* * * *

Urban Design

OBJECTIVE 10

TO DEVELOP THE FULL POTENTIAL OF THE NORTHEASTERN WATERFRONT IN ACCORD WITH THE UNIQUE OPPORTUNITIES PRESENTED BY ITS RELATION TO THE BAY, TO THE OPERATING PORT, FISHING INDUSTRY, AND DOWNTOWN; AND TO ENHANCE ITS UNIQUE AESTHETIC QUALITIES OFFERED BY WATER, TOPOGRAPHY, VIEWS OF THE CITY AND BAY, AND ITS HISTORIC MARITIME CHARACTER.

~~***MAP 2 - Height and Bulk Plan***~~

POLICY 10.1

Preserve the physical form of the waterfront and reinforce San Francisco's distinctive hill form by maintaining low*er* **structures near the water, with an increase in vertical development near hills or the downtown core area. Promote preservation and historic rehabilitation of finger piers, bulkhead buildings, and structures in the Embarcadero National Register Historic District. Larger buildings and structures with civic importance may be appropriate at important locations.**

* * * *

Specific Policies for Buildings

POLICY 10.25

~~***Restrict development south of Broadway to the Height and Bulk Districts shown on Map 2.***~~*[Reserved]*

* * * *

Ferry Building Subarea

* * * *

OBJECTIVE 26

TO FURTHER DEVELOP THE FERRY BUILDING AND DOWNTOWN FERRY TERMINAL AREA AS A MAJOR TRANSIT CENTER, IMPROVING AND EXPANDING TRANSIT ACCESS BY, AND TRANSFERS AMONG, LANDSIDE AND WATERSIDE TRANSIT SYSTEMS.

* * * *

POLICY 26.23

~~***Change the Height and Bulk District on Block 3743 from 84-E to 40-X. Change the Height and Bulk District on the rest of the Rincon Park Site to open space.***~~ *[Reserved]*

* * * *

Section 9. The General Plan is hereby amended by revising the Van Ness Avenue Area Plan, to read as follows:

(a) For Map 1, "Generalized Land Use and Density Plan":

(1) At the bottom of Map 1 under the map title, revise the language in parentheses, to read as follows: "(FAR applies to ~~*residential and*~~ nonresidential uses)";

(2) For the area north of Broadway and South of Bay Street in Map 1, revise the language below "Residential Ground Floor Retail", to read as follows: "1 Non Residential FAR ~~*1 Unit/400 Sq. Ft.*~~";

(3) For the area south of Broadway and north of California Street in Map 1, revise the language below "Mixed Use", to read as follows: "~~*Residential,*~~ Nonresidential 4.5:1 FAR"; and

(4) For the area south of California Street and north of Redwood Street in Map 1, revise the language below "Mixed Use", to read as follows: "~~*Residential,*~~ Nonresidential 7.1:1 FAR".

(b) Map 2, “Height and Bulk Districts” is hereby removed from the Van Ness Avenue Area Plan.

(c) The Van Ness Avenue Area Plan is further revised, to read as follows:

Van Ness Avenue Area Plan

* * * *

Land Use

* * * *

OBJECTIVE 1

~~*CONTINUE EXISTING OF THE AVENUE AND*~~ **ADD A SIGNIFICANT INCREMENT OF NEW HOUSING.**

~~*Although there are 18 buildings containing 980 dwelling units in this subarea most of the buildings are in non-residential use.*~~

This section of Van Ness Avenue is one of the few areas in the city where new housing can be accommodated with minimal impacts on existing residential neighborhoods and public services.

Some of the features that make the area attractive for medium density mixed use development with high density housing are as follows:

This 16 block strip along Van Ness Avenue maintains a "central place" location and identity. The area is close to the city’s major employment center, is well-served by transit, has well developed infrastructure (roadway, water, sewer and other public services), wide roadway (93+ feet) and sidewalks (16+ feet), has continuous commercial frontage and numerous attractive, architecturally outstanding buildings.

There are a number of large parcels which are substantially under-developed.

~~*A height limitation of between 80 and 130 ft. would allow sufficient development to make feasible over time the construction of housing on under used parcels.*~~

The minor streets which bisect most of the blocks within this subarea facilitate access to and from new developments with minimal ~~*affects*~~ *effects* on major east-west thoroughfares or on Van Ness Avenue.

Development of a number of medium density, mixed-use projects with continued non-residential use of non-residential buildings would facilitate the transformation of Van Ness Avenue into an attractive mixed use boulevard.

A high-density medical center at the transit nexus of Van Ness Avenue and Geary would support Van Ness Avenue's redevelopment as a mixed use boulevard as set forth in Policy 1.6 below.

* * * *

POLICY 1.4

Maximize the number of housing units.

An overall mix of unit sizes on Van Ness Avenue is desirable to encourage a diverse and mixed range of occupants. ~~*However, the emphasis should be on a larger number of medium sized units (1 and 2 bedroom) rather than a smaller number of large size units because Van Ness Avenue is not anticipated to be a preferred area for family housing.*~~ It is ~~*therefore*~~ more desirable to achieve greater affordability for ~~*the*~~ smaller units by building at a high density. Construction of rental housing is encouraged.

* * * *

Urban Design

OBJECTIVE 5

ENCOURAGE DEVELOPMENT WHICH REINFORCES TOPOGRAPHY AND URBAN PATTERN, AND DEFINES AND GIVES VARIETY TO THE AVENUE.

* * * *

POLICY 5.1

Establish height controls to: emphasize topography *and key transit nodes,* ~~*and*~~ adequately frame the great width of the Avenue, and support the redevelopment of the Avenue as a diverse, mixed use boulevard and transit corridor.

~~*Existing height limits on the Avenue generally range from 40 feet at the northern end to 130 feet in the central portion. This h*~~H*eight* differentiation responds to topographic conditions as well as land use *and transportation* patterns, maintaining distinctions between areas of different character. For example, height districts are gradually tapered from ~~*130 feet*~~ *the tallest allowable height* around ~~*the hilltop at Washington Street*~~*Geary Boulevard* to ~~*80 feet at Pacific Avenue and further to 65 and 40 feet*~~ *the lowest allowable height* towards the Bay shoreline.

~~*Although the majority of existing height controls are adequate to define both the overall topography as well as the great width of the Avenue, the height limit between California and Pacific Streets should be lowered from the existing 130/105-ft. level to 80 ft. in order to facilitate the transition between the greater building heights along the southern part of the Avenue and the mostly low-rise residential development north of Broadway.*~~ Development to maximum height should be closely monitored to avoid blocking views between the high slopes on both sides of the Avenue. Good proportion between the size of a street and that of its buildings is important for streets to be interesting and pleasant places. ~~*The proposed height limits, combined with the Van Ness Plan's proposed bulk controls, encourage definition of the 93-foot wide Avenue.*~~

~~*The height limit for the block bounded by Geary Boulevard, Franklin Street, Post Street and Van Ness Avenue is established at 230 feet as indicated on Map 2 to accommodate development of a medical center that will maximize use of the major transit nexus at this location and give variety to the avenue by diversifying the mix of non-residential uses and enhancing the streetscape.*~~

POLICY 5.2

Encourage a regular street wall and harmonious building forms along the Avenue.

New development should create a coherent street wall along the Avenue through property line development at approximately the same height. Since block face widths are constant, a regularized street wall encourages buildings of similar scale and massing. Nevertheless, some variety of height is inevitable and desirable due to the need to highlight buildings of historical and architectural significance and meet other Objectives of the Plan.

~~*The following controls are proposed for the various bulk districts as shown on the accompanying map:*~~

~~***MAP 2 - Height and Bulk Districts***~~

~~***Setbacks***~~***Streetwall***

POLICY 5.3

Continue the street wall heights as defined by existing significant buildings and promote an adequate enclosure of the Avenue.

New construction on Van Ness Avenue can occur in two basic situations. In some cases, the development will take place between or adjacent to architecturally significant buildings. In this instance, ~~*continuity of design and scale between the old and the new*~~ *respect for the existing context* is of major importance. In other cases, new development will take place in a more isolated design context; for example, between two existing two-story, non-descript commercial structures. In this instance, the overall continuity of scale along the Avenue is of greater importance than the design character of adjacent buildings. ~~*Setbacks of up to 20 feet in depth should be considered for all new development above 40 feet in height and should be required whenever necessary to continue existing significant street wall heights and to define an adequate enclosure of the Avenue. Setbacks can also serve to buffer the upper-level residential units from street-level noise.*~~

POLICY 5.4

~~***Preserve existing view corridors.***~~

~~*In addition to the setback along the Van Ness Avenue frontage, a setback approximately fifteen feet deep should be provided at an appropriate height along California, Pine, Sacramento, Clay and Washington Streets when necessary to preserve view corridors. The recommended setbacks on the east-west streets could be varied on a case-by-case basis, through the Conditional Use review process, as individual buildings undertake massing studies to determine an appropriate building form and setback which would preserve these significant view corridors.* *[Reserved]*

* * * *

Section 10. The General Plan is hereby amended by revising the Market and Octavia Area Plan, to read as follows:

(a) Map 3, "Generalized Height Districts" is hereby removed from the Market and Octavia Area Plan.

(b) The Market and Octavia Area Plan is further revised, to read as follows:

Market and Octavia Area Plan

* * * *

1. Land Use and Urban Form

* * * *

OBJECTIVE 1.1

CREATE A LAND USE PLAN THAT EMBRACES THE MARKET AND OCTAVIA NEIGHBORHOOD'S POTENTIAL AS A SUSTAINABLE MIXED-USE URBAN NEIGHBORHOOD.

The new land use and special use districts, along with revisions to several existing districts, implement this concept. These land use districts provide a flexible framework that encourages new housing and neighborhood services that build on and enhance the area's

urban character. Several planning controls are introduced, including carefully prescribed building envelopes and the elimination of housing density limits, as well as the replacement of parking requirements with parking maximums, based on accessibility to transit.

- *The Van Ness and Market Residential Special Use District* (VNMR-SUD) will encourage the development of a walkable, transit-oriented, high-density, mixed-use neighborhood around the intersection of Van Ness Avenue and Market Street, adjacent to downtown. This district will still have the area's most intensive residential uses, some office uses and neighborhood serving retail. Residential towers will be permitted along the Market / Mission Street corridor, provided they meet urban design standards. Residential towers, if built, would be clustered around the intersection of Market Street and Van Ness Avenue~~, *with heights ranging from 140 – 650 feet*~~.
- ~~*A*~~ *Transit-Oriented Neighborhood Commercial District*s (NCT) will encourage transit-oriented, mixed-use development of a moderate scale ~~*to a height of 85 feet*~~ concentrated near transit services in the Hub, areas immediately adjacent to the downtown and along the Market Street corridor. Retail use is actively encouraged on the ground floor with housing above to enliven commercial streets. Along Market Street and in the Hub, a limited amount of office will be permitted. Complimenting a rich mix of neighborhood-serving retail and services with a dense residential populations in these districts, walking and transit will be the primary means of transportation and car-free housing will be common and encouraged.

  In named NCT and NC*T*-1 ~~*(T)*~~ districts, revised parking requirements and housing density controls will encourage housing above ground-floor retail uses. These districts otherwise remain unchanged. They include current

Neighborhood Commercial Districts (Hayes-Gough, portions of the Upper Market, Valencia) and several parcels ~~currently~~*previously* zoned NC-1.

- ~~A~~ *Residential Transit-Oriented* ~~Residential~~ *District*s (RTO) will encourage moderate-density, multi-family, residential infill, in scale with existing development. The high availability of transit service, proximity of retail and services within walking distance, and limitation on permitted parking will encourage construction of housing without accessory parking. Small-scale retail activities serving the immediate area will be permitted at intersections *in RTO-1 districts and on all lots in RTO-C districts*.

* * * *

OBJECTIVE 1.2

ENCOURAGE URBAN FORM THAT REINFORCES THE PLAN AREA'S UNIQUE PLACE IN THE CITY'S LARGER URBAN FORM AND STRENGTHENS ITS PHYSICAL FABRIC AND CHARACTER.

The plan's urban form ~~*and height proposal*~~ is based on enhancing the existing variety of scale and character throughout the plan area. The plan ~~*adjusts heights in various locations*~~ *aims* to achieve urban design goals and to maximize efficient building forms for housing, given building code, fire, and other safety requirements. The ~~*heights*~~ *plan* ensure*s* that new development contributes positively to the urban form of the neighborhood and allows flexibility in the overall design and architecture of individual buildings.

~~*The height map on the following page implements the following policies:*~~

~~***MAP 3 - Generalized Height Districts***~~

POLICY 1.2.1

Relate the prevailing height of buildings to street widths throughout the plan area.

It is the height and mass of individual buildings that define the public space of streets. Building heights have historically been strongly related to the width of streets in the Market and Octavia neighborhood and elsewhere in the city. Where building heights are related to the width of the facing streets, they enclose the street and define it as a comfortable, human-scaled space with ample light and air.

The permitted heights should strengthen the relationship between the height of buildings and the width of streets~~, as shown in Map 3 Height Districts~~.

POLICY 1.2.2

Maximize housing opportunities and encourage high-quality commercial spaces on the ground floor.

~~*Proposed heights*~~ *Height limits* in neighborhood commercial districts ~~*are adjusted*~~ *should be set* to maximize housing potential within specific construction types. Where ground floor commercial is most desirable, ~~*existing 40- and 50-foot height districts*~~ *building height limits* ~~*are adjusted to*~~ *should* permit ~~*an additional five feet of height provided that it is used to create more*~~ generous ceiling heights on the ground floor *of up to 15 feet*.

It is also common in the Market and Octavia neighborhood, as with the rest of San Francisco, to provide housing above ground floor commercial spaces along neighborhood commercial streets. This not only provides much-needed housing close to services and, in most cases, transit, but also provides a residential presence to these streets, increasing their vitality and the sense of safety for all users.

POLICY 1.2.3

~~***Limit***~~ ***Appropriately sculpt building*** **heights along the alleys in order to provide ample sunlight and air in accordance with the plan principles that relate building heights to street widths.**

- ~~*In order to maximize light in alleys given their narrow scale, heights in alleys are generally limited to 40 feet, however:*~~
- ~~*Heights in alleys are lowered on the southern side of east/west residential alleys to preserve a 50 degree sun angle from the north sidewalk to the building corner in order to provide adequate sunlight to the public right-of-way. For a 35-foot wide alley, this gives a maximum streetwall height of 35-feet.*~~

Given their narrow scale, building heights along alleys should be sculpted to maximize light and create a positive pedestrian experience.

* * * *

POLICY 1.2.6

Mark the block of Market Street from Buchanan Street to Church Street as a gateway to the Castro.

The block of Market Street from Buchanan Street to Church Street marks the entrance to the Castro. At Buchanan Street, heights and form respond to Mint Hill and preserve views to the Mint from Dolores Street. At Church Street, building forms should accent this point, with architectural treatments that express the significance of the intersection. ~~*The height map allows for buildings up to 85-feet in height at the intersection of Church and Market Streets.*~~ Special architectural features should be used at the corners of new buildings to express the visual importance of this intersection.

POLICY 1.2.7

Encourage new mixed-use infill on Market Street with a scale and stature appropriate for the varying conditions along its length.

Market Street is a uniquely monumental street, with buildings along its length that have a distinctive scale and stature, especially east of its intersection with Van Ness Avenue. West of Van Ness Avenue, new buildings should have a height and scale that strengthens the

street's role as a monumental public space. ~~*A podium height limit of 120-feet along Market Street is established east of Van Ness Avenue, consistent with its width. Buildings heights step down to 85-65-feet along Market Street west of Van Ness Avenue, providing a transition to surrounding areas.*~~

* * * *

POLICY 1.2.10

Preserve midblock open spaces in residential districts.

Residential districts in the plan area have a well-established pattern of interior-block open spaces that contribute to the livability of the neighborhood. ~~*Along some of the area's primary streets, 65-feet and higher height districts directly abut smaller scale residential districts of 40-feet or lower height districts.*~~ Care must be taken to sculpt new development so that light and air are preserved to midblock spaces. Upper Market NCT lots that abut residential midblock open spaces will be required to provide rear-yards at all levels.

* * * *

2. Housing

* * * *

The fundamental principles are:

- *Provide ample and diverse housing opportunities to add to the vitality of the place.* Maximize the amount and types of housing in the neighborhood to serve a wide variety of people, including a range of incomes, ages, and household and family compositions. The Plan does so by looking to the prevailing built form of the area and carefully prescribing controls for building envelopes to emulate that form. Controls that limit building area by restricting housing are ~~*eliminated*~~ *reduced* in favor of well-defined height and bulk controls and urban design guidelines, encouraging building types more in keeping with the area's established development pattern, and allowing greater flexibility in the type and

configuration of new housing. In addition, residential buildings are also encouraged to include a mix of amenities that support the needs of families with children and sustainable transportation choices, such as social and play spaces and easily accessible storage for strollers, car seats, grocery carts, and bicycles.

* * * *

OBJECTIVE 2.2

ENCOURAGE CONSTRUCTION OF RESIDENTIAL INFILL THROUGHOUT THE PLAN AREA.

* * * *

POLICY 2.2.2

Ensure a mix of unit sizes is built in new development and is maintained in existing housing stock.

Greater unit density does not necessarily correlate to housing for more people. For new construction, the new policies are meant to allow flexibility to accommodate a variety of housing and household types, such as student, extended family, or artist housing, as well as development on small and irregular lots. For instance, the Octavia Boulevard parcels are narrow and irregular, and economically and architecturally reasonable projects will likely require more units and flexibility than earlier zoning would allow. Therefore, these controls balance the need for a flexible process that allows innovative and dense designs on irregular parcels, while also providing sufficient control so that existing housing stock and family-sized units are preserved. One goal of The Plan is to ensure the market does not produce only projects with small units. A unit mix requirement will apply to ~~*any project larger than 4 units*~~*larger projects*. Subdivisions will be permitted only when the resulting units retain some larger units.

* * * *

OBJECTIVE 2.3

PRESERVE THE AFFORDABILITY OF EXISTING HOUSING STOCK AND STRENGTHEN TENANT PROTECTION PROGRAMS.

* * * *

POLICY 2.3.2

Prohibit residential demolitions unless they would result in sufficient replacement of existing housing units. Even when replacement housing is provided, demolitions should further be restricted to ensure affordable housing and historic resources are maintained.

The City's General Plan discourages residential demolitions, except where it would result in replacement housing equal to or exceeding that which is to be demolished. This policy will be applied in the Market & Octavia area in such a way that new housing would at least offset the loss of existing units, and the City's affordable housing, and historic resources would be protected. The plan maintains a strong prejudice against the demolition of sound housing, particularly affordable housing.

Even when replacement housing is provided, demolitions would be permitted only through conditional use in the event the project serves the public interest by giving consideration to each of the following: (1) affordability, (2) soundness, (3) maintenance history, (4) historic resource assessment, (5) number of units, (6) superb architectural and urban design, (7) rental housing opportunities, (8) number of family-sized units, (9) supportive housing or serves a special or underserved population, and (10) a public interest or public use that cannot be met without the proposed demolition. *Certain local and state laws may offer or require an additional layer of approvals criteria, processes, and requirements, including the requirement in certain circumstances for replacement units, rent-restrictions and other provisions to limit or mitigate displacement of existing tenants.*

* * * *

3. Building With a Sense of Place and Sustainability

* * * *

OBJECTIVE 3.1

ENCOURAGE NEW BUILDINGS THAT CONTRIBUTE TO THE BEAUTY OF THE BUILT ENVIRONMENT AND THE QUALITY OF STREETS AS PUBLIC SPACE.

*** * * ***

Policy 3.1.1

Ensure that new development adheres to principles of good urban design.

New development will take place over time. Modest structures will fill in small gaps in the urban fabric, some owners will upgrade building facades, and large underutilized land areas, such as the former Central Freeway parcels, will see dramatic revitalization in the years ahead.

The following Fundamental Design Principles apply to all new development in the Market and Octavia area. They are intended to supplement existing design guidelines, Fundamental Principles in the Urban Design Element of the General Plan and the Planning Department's Residential Design Guidelines, which apply to residential districts, and the Urban Design Guidelines, which apply to commercial, downtown, and mixed-use districts. They address the following areas: (1) Building Massing and Articulation; (2) Tower Design Elements; (3) Ground Floor Treatment, further distinguished by street typology, including (a) Neighborhood Commercial Streets, (b) Special Streets - Market Street, and (c) Alleys, and (4) Open Space. *Projects shall also conform to Citywide Design Standards and other adopted objective standards.*

* * * *

Fundamental Design Principles for Building Massing and Articulation

The way we experience a building is determined largely by its massing and articulation. Buildings in most San Francisco neighborhoods are no more than five stories tall, built on narrow lots, and have bay windows or other kinds of projections. This gives them a distinct rhythm and verticality, and breaks down the scale to that of the human activity taking place inside and around them. This further relates buildings to the human activities in the street. *Projects shall also conform to Citywide Design Standards and other adopted objective standards.*

* * * *

Fundamental Design Principles for Towers

Towers may be permitted above a base height of 85 - ~~*120*~~*140*-feet in selected locations in the *general vicinity of the intersections of Market and Van Ness and Mission and South* Van Ness*.* ~~*and Market Downtown Residential Special Use District (VNMDR-SUD).*~~ Special urban design considerations are required for towers because of their potential visual impacts on the city skyline and on the quality and comfort of the street. *Projects shall also conform to Citywide Design Standards and other adopted objective standards.*

* * * *

Fundamental Design Principles The Ground Floor

The design and use of a building's ground floor has a direct influence on the pedestrian experience. Ground floor uses in the area are devoted to retail, service, and public uses in mixed-use buildings and to residential units and lobbies in apartment buildings. These uses provide an active and visually interesting edge to the public life of the street, which is especially important on neighborhood commercial streets. Parking, which has become a common street-facing use in more recent buildings, dilutes the visual interest and vitality of the street. This plan maintains a strong presumption against permitting surface-level parking as a street-facing use; rather, it encourages retail, residential, and other active uses facing the

street. *Projects shall also conform to Citywide Design Standards and other adopted objective standards.*

* * * *

Fundamental Design Principles for Streets

NEIGHBORHOOD COMMERCIAL STREETS

Like most parts of San Francisco, neighborhood commercial streets in the Market and Octavia neighborhood provide a center for the life of the area. These streets are typically lined with individual retail storefronts that provide visual interest and have a scale that feels especially lively and organic. While not all new development on these streets need be mixed-use in character, it should contain active ground-floor uses and provide a façade that adds visual interest and a human scale to the street. *Projects shall also conform to Citywide Design Standards and other adopted objective standards.*

* * * *

Section 11. The General Plan is hereby amended by revising the Western SoMa (South of Market) Area Plan, to read as follows:

Western SoMa (South of Market) Area Plan

* * * *

Housing

* * * *

OBJECTIVE 3.2

ENCOURAGE NEW NEIGHBORHOOD RESIDENTIAL USES IN LOCATIONS THAT PROVIDE THE GREATEST OPPORTUNITIES TO BUILD ON THE EXISTING NEIGHBORHOOD PATTERNS

* * * *

POLICY 3.2.2

Encourage in-fill housing production that *utilizes design strategies that consider* *~~continues~~* the existing built housing qualities in terms of heights, prevailing density, yards and unit sizes.

* * * *

Urban Design and Built Form

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OBJECTIVE 5.4

ENCOURAGE APPROPRIATE NEW DEVELOPMENT THAT IS RESPONSIVE TO THE EXISTING AND BUILT ENVIRONMENT.

POLICY 5.4.1

~~Increase prevailing 50-foot heights in the Western SoMa SUD to 55 feet~~ ***Establish height limits and design standards that*** *~~to~~* **encourage gracious floor to ceiling heights for ground floor uses.**

POLICY 5.4.2

~~Reduce~~ ***Establish building massing and design standards that respect the lower scale of Residential Enclaves along alleys.*** *~~heights to 40 feet.~~*

Section 12. The General Plan is hereby amended by revising the Western Shoreline Area Plan, to read as follows:

Western Shoreline Area Plan

* * * *

Richmond and Sunset Residential Neighborhoods

OBJECTIVE 11

~~***PRESERVE THE SCALE OF RESIDENTIAL AND COMMERCIAL DEVELOPMENT ALONG THE COASTAL ZONE AREA.***~~ ***ENSURE DEVELOPMENT IN THE COASTAL ZONE ADVANCES HOUSING AND COMMUNITY DEVELOPMENT GOALS APPROPRIATE FOR THE LOCATION OF EACH PARCEL.***

POLICY 11.1

~~***Preserve the scale and character of existing residential neighborhoods by setting allowable densities at the density generally prevailing in the area and regulating new development so its appearance is compatible with adjacent buildings.***~~ ***Consider the location of each parcel relative to both the city context, including major commercial and transit corridors, as well as the coast, when establishing standards for the form, design, and use of new development.***

* * * *

Section 13. The General Plan is hereby amended by revising Map 5, "Proposed Height and Bulk Districts," of the Downtown Area Plan, to read as follows:

Add to the map notes: "The buildings on parcels between 11th Street and 12th Street, and Van Ness Avenue and Franklin Street that are north of Mission Street and south of Fell Street may be considered for additional height above that indicated on this map to emphasize the skyline node at the intersection of Market Street and Van Ness Avenue in keeping with the principles of the Urban Design Element and this Plan."

Section 14. The Land Use Index shall be updated as necessary to reflect the amendments set forth above in Sections 3, 6, 7, 8, 9, 10, and 13.

Section 15. Local Coastal Program. The Local Coastal Program is hereby amended to revise the Land Use Plan (the Western Shoreline Area Plan) of the Local Coastal Program, as described in Section 12 of this ordinance.

Section 16. Effective and Operative Dates Outside the Coastal Zone.

(a) In the portions of the City that are not located in the Coastal Zone Permit Area, as that permit area is designated on Section Maps CZ4, CZ5, and CZ13 of the Zoning Map, this ordinance shall become effective 30 days after enactment. Enactment occurs when the Mayor signs the ordinance, the Mayor returns the ordinance unsigned or does not sign the ordinance within 10 days of receiving it, or the Board of Supervisors overrides the Mayor's veto of the ordinance.

(b) In the portions of the City that are not located in the Coastal Zone Permit Area, this ordinance shall become operative upon its effective date.

Section 17. Effective and Operative Dates in the Coastal Zone.

(a) In the portions of the City that are located in the Coastal Zone Permit Area, this ordinance shall become effective 30 days after enactment. Enactment occurs when the Mayor signs the ordinance, the Mayor returns the ordinance unsigned or does not sign the ordinance within 10 days of receiving it, or the Board of Supervisors overrides the Mayor's veto of the ordinance.

(b) Upon enactment, the Director of the Planning Department shall submit this ordinance to the California Coastal Commission for certification as a Local Coastal Program Amendment. This ordinance shall become operative in the Coastal Zone Permit Area upon final certification by the California Coastal Commission. If the California Coastal Commission

certifies this ordinance subject to modifications, this ordinance, as so modified, shall become operative in the Coastal Zone Permit Area 30 days after enactment of the modifications.

Section 18. Transmittal of Ordinance. Upon certification by the California Coastal Commission, the Director of the Planning Department shall transmit a copy of the certified Local Coastal Program Amendment to the Clerk of the Board for inclusion in File No. 250966. The Planning Department shall also retain a copy of the certified Local Coastal Program Amendment in its Local Coastal Program files.

APPROVED AS TO FORM:
DAVID CHIU, City Attorney

By: /s/
GIULIA GUALCO-NELSON
Deputy City Attorney

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FILE NO. 250966

LEGISLATIVE DIGEST

[General Plan Amendments - Family Zoning Plan]

Ordinance amending the General Plan to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; amending the City's Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 340.

Existing Law

Under Charter Section 4.105 and Planning Code Section 340, any amendments to the General Plan shall first be considered by the Planning Commission and recommended for approval or rejection by the Board of Supervisors.

Under California Housing Element law, San Francisco must identify sites to accommodate its Regional Housing Needs Allocation (RHNA) goal of 82,069 new units in the next eight years. Because San Francisco does not currently have sufficient capacity to accommodate the RHNA goals, it must rezone sites to meet these goals, and must do so by January 31, 2026. Additional capacity will be created through amendments to the Planning Code and Zoning Maps, as set forth in the ordinances in Board Files 250700 and 250701, as introduced on June 24, 2025.

Amendments to Current Law

This ordinance would amend the General Plan to facilitate the Housing Element rezoning (the "Family Zoning Plan") in Board Files 250700 and 250701. This ordinance amends the General Plan as follows:

Urban Design Element

- delete Map 5, “Urban Design Guidelines for Bulk of Buildings”
- revise policies concerning neighborhood character and new development height and bulk

Commerce and Industry Element
- revise policies regarding scale, height, and bulk of new development

Transportation Element
- revise off-street parking policies

Balboa Park Station Area Plan
- delete “Height Districts” map
- revise policies concerning size, scale, design, massing, and articulation of new development

Glen Park Community Plan
- delete Map 3, “Existing and Proposed Heights”
- revise policies concerning neighborhood character and building height

Market and Octavia Area Plan
- delete Map 3, “Generalized Height Districts”
- revise policies concerning new development height and bulk, building sculpting along alleys, unit mix, residential demolition, and design principles
- revise policy to include reference to newly created Residential Transit Oriented-Commercial (RTO-C) district

Northeastern Waterfront Plan
- delete Map 2, “Height and Bulk Plan”
- delete policy restricting new development in certain areas of the Plan
- revise policies concerning height and bulk of new development

Van Ness Avenue Area Plan
- revise Map 1, “Generalized Land Use and Density Plan” to remove residential FAR references
- revise policies concerning height of new development, size of new residential units, street walls, and view corridors

Western SoMa (South of Market) Area Plan
- revise policies concerning building heights, design principles, and heights along alleys

Western Shoreline Area Plan

- amend policies that comprise the Land Use Plan of the City's certified Local Coastal Program
- amend policies concerning neighborhood character and design compatibility with new development

Downtown Area Plan

- revise Map 5, "Proposed Height and Bulk Districts," to add additional height for parcels between 11th Street and 12th Street, and Van Ness Avenue and Franklin Street that are north of Mission Street and south of Fell Street

Land Use Index

- make conforming revisions to the Land Use Index

Background Information

On September 11, 2025 the Planning Commission considered the proposed amendments to the General Plan and recommended initiation in Planning Commission Resolution 21808.

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LAND USE AND TRANSPORTATION COMMITTEE
CITY AND COUNTY OF SAN FRANCISCO

MEETING MINUTES - DRAFT

Monday, October 20, 2025 - 1:30 PM

City Hall, Legislative Chamber, Room 250

Regular Meeting

Members: Myrna Melgar, Chyanne Chen, Bilal Mahmood

Clerk: John Carroll

(415) 554-4445 ~ john.carroll@sfgov.org

Angela Calvillo, Clerk of the Board

BOARD COMMITTEES

Committee Membership	Meeting Days
Budget and Appropriations Committee Supervisors Chan, Dorsey, Walton, Mandelman	Wednesday 1:30 PM
Budget and Finance Committee Supervisors Chan, Dorsey	Wednesday 10:00 AM
Government Audit and Oversight Committee Supervisors Fielder, Sauter, Sherrill	1st and 3rd Thursday 10:00 AM
Land Use and Transportation Committee Supervisors Melgar, Chen, Mahmood	Monday 1:30 PM
Public Safety and Neighborhood Services Committee Supervisors Dorsey, Mahmood, Sauter	2nd and 4th Thursday 10:00 AM
Rules Committee Supervisors Walton, Sherrill, Mandelman	Monday 10:00 AM

First-named Supervisor is Chair, Second-named Supervisor is Vice-Chair of the Committee.

Members Present: Myrna Melgar, Chyanne Chen, and Bilal Mahmood

The Land Use and Transportation Committee met in regular session on Monday, October 20, 2025, with Chair Myrna Melgar presiding. Chair Melgar called the meeting to order at 1:33 p.m.

ROLL CALL AND ANNOUNCEMENTS

On the call of the roll, Chair Melgar, Vice Chair Chen, and Member Mahmood were noted present. A quorum was present.

COMMUNICATIONS

John Carroll, Land Use and Transportation Committee Clerk, instructed members of the public that public comment is taken on each item on the agenda. Alternatively, written comments may be submitted through email (john.carroll@sfgov.org) or the U.S. Postal Service at City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102.

AGENDA CHANGES

There were no agenda changes.

REGULAR AGENDA

SPECIAL MEETING OF THE BOARD OF SUPERVISORS

Supervisors Chan, Sauter, and Fielder were noted present at 1:33 p.m., thereby constituting a quorum of the Board of Supervisors. A special meeting of the Board of Supervisors was convened at 1:33 p.m., although the meeting was conducted in all respects as a committee meeting for items on the agenda and any substantive decisions constitute a recommendation of the committee and not action taken by the board.

Present: Supervisors Melgar, Chen, Mahmood, Chan, Sauter, and Fielder.

Supervisors Mandelman, Walton, and Sherrill were noted present at 1:42 p.m.

Supervisor Walton was noted not present at 2:05 p.m.

Supervisor Mandelman was noted not present at 2:51 p.m.

Supervisor Sherrill was noted not present at 3:01 p.m.

ADJOURNMENT OF THE BOARD OF SUPERVISORS

At the hour of 3:48 p.m., Supervisor Fielder was noted not present, thereby adjouring the Special Meeting of the Board of Supervisors.

Chair Melgar requested that File Nos. 250966, 250700, 250701, and 250985 be heard together.

Chair Melgar recessed the meeting at 8:33 p.m., and reconvened at 8:35 p.m.

250966 **[General Plan Amendments - Family Zoning Plan]**

Ordinance amending the General Plan to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; amending the City's Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 340. (Planning Commission)
(Pursuant to Charter, Section 4.105, the Planning Commission recommends General Plan amendments to the Board of Supervisors for approval or rejection. If the Board fails to act within 90 days of receipt, the proposed General Plan amendment shall be deemed approved. Transmittal Date: September 22, 2025)

Heard in Committee. Speakers: Brad Russi (Office of the City Attorney); Rachel Tanner, Lisa Chen, James Pappas, Josh Switzky, Lisa Gibson (Planning Department); Supervisors Rafael Mandelman, Jackie Fielder, Stephen Sherrill, Danny Sauter, and Connie Chan (Board of Supervisors); presented information and answered questions raised throughout the discussion. George Wooding; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Kent; Georgia Schuttish; Lisa Lugi; Gary; Jennifer Belson; Christopher Peterson; Speaker; Alex Landsberg; Julie Fischer; Speaker; Speaker; Sam; Speaker; Carmen Lee; Rosa Shields: Alexandra Zang; Katherine Howard; Speaker; Tyson; Bernie Green; David Woo; Richard Frankel; Sam Hayes; Eileen Purcell; Leslie Simon; Paul; Jessica; Speaker; Justin; Quentin Mecke (Council of Community Housing Organizations); Rahama; John Espinoza; Steven Torres; Carolyn; Dan Rosenfeld; Eileen Hearst; Catherine; Madison; Gwen McLaughlin; Speaker; Sarah Cruz; Romalyn Schmaltz; Apollo; Aldo Weisman; Lori Leiderman; Lance; Speaker; Steph; Jess; Emily Mock; Michelle; Speaker; Jeff; Joanna; Wes; Jacinda; Jacob Talbot; Asia Duncan; Speaker; Christian Tersios; Speaker; Peggy; Patrick; Christin Evans; Speaker; Ellen; Jordan; Mikah; Speaker; Speaker; Speaker; Eileen Boken; Speaker; Jason Wright; Richard; Speaker; Theresa; Miranda Erlicht; Nina Block; Phillip; Speaker; Tadd Buckner; Katt Well; Charlie; Speaker; Speaker; Speaker; Kate; Speaker; Speaker; Patrice; Mike Casey; Speaker; Will Jackson; Speaker; Speaker; Sarah Rogers; Speaker; Bobak Esfandiari; Bernie Powell; Taylor; Juliana; Mark; Nicholas; Mike; Lucas Wang; John Crabtree; Lisa Arges; Tyler; Frank; Leanne; Speaker; Speaker; Speaker; Peter; David Kim; Thomas Rogers; Monica Morse; Speaker; Mikela; Speaker; Paula Katz (See addendum on page 12); Honest Charlie Bodkin; Brianna Morales (Housing Action Coalition); Alec Bash; Jane Natoli; Edward; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be CONTINUED to the Land Use and Transportation Committee meeting of November 3, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250700 **[Zoning Map - Family Zoning Plan]**

Sponsors: Mayor; Sauter, Mahmood and Dorsey

Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.
(Economic Impact; No Economic Impact Analysis Report)

Heard in Committee. Speakers: Brad Russi (Office of the City Attorney); Rachel Tanner, Lisa Chen, James Pappas, Josh Switzky, Lisa Gibson (Planning Department); Supervisors Rafael Mandelman, Jackie Fielder, Stephen Sherrill, Danny Sauter, and Connie Chan (Board of Supervisors); presented information and answered questions raised throughout the discussion. George Wooding; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Kent; Georgia Schuttish; Lisa Lugi; Gary; Jennifer Belson; Christopher Peterson; Speaker; Alex Landsberg; Julie Fischer; Speaker; Speaker; Sam; Speaker; Carmen Lee; Rosa Shields: Alexandra Zang; Katherine Howard; Speaker; Tyson; Bernie Green; David Woo; Richard Frankel; Sam Hayes; Eileen Purcell; Leslie Simon; Paul; Jessica; Speaker; Justin; Quentin Mecke (Council of Community Housing Organizations); Rahama; John Espinoza; Steven Torres; Carolyn; Dan Rosenfeld; Eileen Hearst; Catherine; Madison; Gwen McLaughlin; Speaker; Sarah Cruz; Romalyn Schmaltz; Apollo; Aldo Weisman; Lori Leiderman; Lance; Speaker; Steph; Jess; Emily Mock; Michelle; Speaker; Jeff; Joanna; Wes; Jacinda; Jacob Talbot; Asia Duncan; Speaker; Christian Tersios; Speaker; Peggy; Patrick; Christin Evans; Speaker; Ellen; Jordan; Mikah; Speaker; Speaker; Speaker; Eileen Boken; Speaker; Jason Wright; Richard; Speaker; Theresa; Miranda Erlicht; Nina Block; Phillip; Speaker; Tadd Buckner; Katt Well; Charlie; Speaker; Speaker; Speaker; Kate; Speaker; Speaker; Patrice; Mike Casey; Speaker; Will Jackson; Speaker; Speaker; Sarah Rogers; Speaker; Bobak Esfandiari; Bernie Powell; Taylor; Juliana; Mark; Nicholas; Mike; Lucas Wang; John Crabtree; Lisa Arges; Tyler; Frank; Leanne; Speaker; Speaker; Speaker; Peter; David Kim; Thomas Rogers; Monica Morse; Speaker; Mikela; Speaker; Paula Katz (See addendum on page 12); Honest Charlie Bodkin; Brianna Morales (Housing Action Coalition); Alec Bash; Jane Natoli; Edward; shared various concerns regarding the ordinance matter.

Chair Melgar requested that this Ordinance be DUPLICATED

See duplicate File No. 251071.

Chair Melgar moved that this Ordinance be CONTINUED to the Land Use and Transportation Committee meeting of November 3, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

251071 **[Zoning Map - Family Zoning Plan]**

Sponsors: Mayor; Sauter, Mahmood and Dorsey

Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.
(Economic Impact; No Economic Impact Analysis Report)

Duplicated from File No. 250700.

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING NEW TITLE, to remove the base zoning and height and bulk changes to parcels in the Priority Equity Geographies Special Use District ("PEG SUD", Planning Code, Section 249.97), except that any parcels with RTO zoning in the PEG shall be reclassified to RTO-1; remove the base zoning and height and bulk changes to parcels located in the Coastal Zone north of Fulton Street; remove two parcels in the Coastal Zone from the SFMTA SUD; to adjust the base height for the R-4 Height and Bulk Districts for the following areas and street segments: Inner Clement NCD: 40//40-R-4, Outer Clement NCD: 40//40-R-4, Outer Balboa NCD: 40//40-R-4, Geary Boulevard between 32nd and 43rd Avenue: 50//65-R-4, Portions of Block 1070 on Geary Boulevard: 50//85-R-4, Block 0446 on Marina Boulevard: 40//40-R-4, Block 0452 on North Point Street: 40//40-R-4, Portions of Block 0025 along Hyde, Beach, and North Point Streets: 40//40-R-4; eliminate the proposed change from RH-2 to Geary Boulevard NCD for Assessor's Parcel Block No. 1070/002; and made conforming amendments throughout the ordinance text. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented – Commercial (RTO-C), except for properties located in the Priority Equity Geographies Special Use District ("PEG SUD"); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented – 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1, except for properties located in the PEG SUD; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2) , except for properties located in the PEG SUD; and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts, except for properties located in the PEG SUD; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District, except for properties located in the PEG SUD; 2) change the height limits on certain lots in the R-4 Height and Bulk District, except for properties located in the PEG SUD; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone south of Lincoln Way to R-4 Height and Bulk District; 2) reclassify certain properties south of Lincoln Way to RTO-C and Neighborhood Commercial District; and 3) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.
(Economic Impact; No Economic Impact Analysis Report)

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of November 3, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250701 **[Planning, Business and Tax Regulations Codes - Family Zoning Plan]**

Sponsor: Mayor

Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this Ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

(Economic Impact; No Economic Impact Analysis Report)

Heard in Committee. Speakers: Brad Russi (Office of the City Attorney); Rachel Tanner, Lisa Chen, James Pappas, Josh Switzky, Lisa Gibson (Planning Department); Supervisors Rafael Mandelman, Jackie Fielder, Stephen Sherrill, Danny Sauter, and Connie Chan (Board of Supervisors); presented information and answered questions raised throughout the discussion. George Wooding; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Kent; Georgia Schuttish; Lisa Lugi; Gary; Jennifer Belson; Christopher Peterson; Speaker; Alex Landsberg; Julie Fischer; Speaker; Speaker; Sam; Speaker; Carmen Lee; Rosa Shields: Alexandra Zang; Katherine Howard; Speaker; Tyson; Bernie Green; David Woo; Richard Frankel; Sam Hayes; Eileen Purcell; Leslie Simon; Paul; Jessica; Speaker; Justin; Quentin Mecke (Council of Community Housing Organizations); Rahama; John Espinoza; Steven Torres; Carolyn; Dan Rosenfeld; Eileen Hearst; Catherine; Madison; Gwen McLaughlin; Speaker; Sarah Cruz; Romalyn Schmaltz; Apollo; Aldo Weisman; Lori Leiderman; Lance; Speaker; Steph; Jess; Emily Mock; Michelle; Speaker; Jeff; Joanna; Wes; Jacinda; Jacob Talbot; Asia Duncan; Speaker; Christian Tersios; Speaker; Peggy; Patrick; Christin Evans; Speaker; Ellen; Jordan; Mikah; Speaker; Speaker; Speaker; Eileen Boken; Speaker; Jason Wright; Richard; Speaker; Theresa; Miranda Erlicht; Nina Block; Phillip; Speaker; Tadd Buckner; Katt Well; Charlie; Speaker; Speaker; Speaker; Kate; Speaker; Speaker; Patrice; Mike Casey; Speaker; Will Jackson; Speaker; Speaker; Sarah Rogers; Speaker; Bobak Esfandiari; Bernie Powell; Taylor; Juliana; Mark; Nicholas; Mike; Lucas Wang; John Crabtree; Lisa Arges; Tyler; Frank; Leanne; Speaker; Speaker; Speaker; Peter; David Kim; Thomas Rogers; Monica Morse; Speaker; Mikela; Speaker; Paula Katz (See addendum on page 12); Honest Charlie Bodkin; Brianna Morales (Housing Action Coalition); Alec Bash; Jane Natoli; Edward; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME

TITLE, to prohibit projects using the Local Program if the project requires demolition of housing where there are 3 or more rent controlled units; amend the bonus for "warm shell" commercial spaces by limiting the proposed 3 square foot bonus to food service-ready "warm shells" and creating a 2.5 square foot bonus for "general warm shells"; amend the local program bonus to offer an additional bonus where the Local Program project replaces existing commercial space; and made conforming changes throughout the ordinance text. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

(Economic Impact; No Economic Impact Analysis Report)

Chair Melgar requested that this Ordinance be DUPLICATED AS AMENDED

See dulplicated File No. 251072.

Chair Melgar requested that this Ordinance be DUPLICATED AS AMENDED

See dulplicated File No. 251073.

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of November 3, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

251072 [Planning, Business and Tax Regulations Codes - Family Zoning Plan]

Sponsor: Mayor

Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this Ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

(Economic Impact; No Economic Impact Analysis Report)

Duplicated from File No. 250701.

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING NEW TITLE, to prohibit Lot Mergers on properties with certain types of historic resources; and making conforming amendments throughout the ordinance text. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, prohibit Lot mergers on Lots with Category A historic resources, subject to certain preservation obligations, and 13) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.
(Economic Impact; No Economic Impact Analysis Report)

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of December 1, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

251073 **[Planning, Business and Tax Regulations Codes - Family Zoning Plan]**

Sponsor: Mayor

Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this Ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

(Economic Impact; No Economic Impact Analysis Report)

Duplicated from File No. 250701.

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, to amend the Local Program to exclude projects that: demolish or substantially alter Category A historic resources, demolish, remove, or convert dwelling units or residential flats, or demolish or convert any portion of a Tourist Hotel; to amend the Local Program to state that other City's laws would apply to Local Program projects, such as Dwelling Unit Mix requirements in Section 207.7, Article 4 development impact fees and requirements, displaced business requirements in new Section 202.17, tenant protections in the Planning Code or SF Rent Ordinance, or other permitting or licensing requirements outside of the Planning Code; to require projects that comply with the Inclusionary ordinance through off-site units or land dedication to provide those units within 1/2 mile of the project; to amend the Local Program approvals to expire if the project sponsor fails to obtain a building permit within 30 days, subject to six-month extension; to amend the Local Program to provide additional bonus square footage of 250 additional square feet for every two-bedroom unit in excess of the dwelling unit requirements for the Local Program; to amend the Housing Sustainability District to prohibit any projects using the Housing Sustainability District streamlining from demolishing or substantially altering Category A historic resources, or demolishing or converting any portion of a Tourist Hotel; to amend the SFMTA SUD by adding findings regarding the purpose of the SUD, adding pre-application requirements, and excluding properties in the Coastal Zone; to remove the exception included in the ordinance in Board File No. 250701 that did not require a Conditional Use Authorization to merge, reconfigure or reduce a residential flats, if the project adds at least one unit; and making conforming changes throughout the ordinance text. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

(Economic Impact; No Economic Impact Analysis Report)

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of November 3, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250985 **[Local Coastal Program Amendment - Family Zoning Plan]**

Sponsor: Mayor

Resolution transmitting to the California Coastal Commission for review and certification an amendment to the Implementation Program and Land Use Plan of the City's certified Local Coastal Program to implement the Family Zoning Plan; and affirming the Planning Department's determination under the California Environmental Quality Act.

Heard in Committee. Speakers: Brad Russi (Office of the City Attorney); Rachel Tanner, Lisa Chen, James Pappas, Josh Switzky, Lisa Gibson (Planning Department); Supervisors Rafael Mandelman, Jackie Fielder, Stephen Sherrill, Danny Sauter, and Connie Chan (Board of Supervisors); presented information and answered questions raised throughout the discussion. George Wooding; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Speaker; Kent; Georgia Schuttish; Lisa Lugi; Gary; Jennifer Belson; Christopher Peterson; Speaker; Alex Landsberg; Julie Fischer; Speaker; Speaker; Sam; Speaker; Carmen Lee; Rosa Shields: Alexandra Zang; Katherine Howard; Speaker; Tyson; Bernie Green; David Woo; Richard Frankel; Sam Hayes; Eileen Purcell; Leslie Simon; Paul; Jessica; Speaker; Justin; Quentin Mecke (Council of Community Housing Organizations); Rahama; John Espinoza; Steven Torres; Carolyn; Dan Rosenfeld; Eileen Hearst; Catherine; Madison; Gwen McLaughlin; Speaker; Sarah Cruz; Romalyn Schmaltz; Apollo; Aldo Weisman; Lori Leiderman; Lance; Speaker; Steph; Jess; Emily Mock; Michelle; Speaker; Jeff; Joanna; Wes; Jacinda; Jacob Talbot; Asia Duncan; Speaker; Christian Tersios; Speaker; Peggy; Patrick; Christin Evans; Speaker; Ellen; Jordan; Mikah; Speaker; Speaker; Speaker; Eileen Boken; Speaker; Jason Wright; Richard; Speaker; Theresa; Miranda Erlicht; Nina Block; Phillip; Speaker; Tadd Buckner; Katt Well; Charlie; Speaker; Speaker; Speaker; Kate; Speaker; Speaker; Patrice; Mike Casey; Speaker; Will Jackson; Speaker; Speaker; Sarah Rogers; Speaker; Bobak Esfandiari; Bernie Powell; Taylor; Juliana; Mark; Nicholas; Mike; Lucas Wang; John Crabtree; Lisa Arges; Tyler; Frank; Leanne; Speaker; Speaker; Speaker; Peter; David Kim; Thomas Rogers; Monica Morse; Speaker; Mikela; Speaker; Paula Katz (See addendum on page 12); Honest Charlie Bodkin; Brianna Morales (Housing Action Coalition); Alec Bash; Jane Natoli; Edward; shared various concerns regarding the resolution matter.

Chair Melgar moved that this Resolution be CONTINUED to the Land Use and Transportation Committee meeting of November 3, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

ADJOURNMENT

There being no further business, the Land Use and Transportation Committee adjourned at the hour of 8:37 p.m.

N.B. The Minutes of this meeting set forth all actions taken by the Land Use and Transportation Committee on the matters stated, but not necessarily in the chronological sequence in which the matters were taken up.

ADDENDUM

Pursuant to Administrative Code, Section 67.16, the following statement was provided by a speaker during the public comment period who supplied a brief written summary of their comments, which shall be included in the meeting minutes and are incorporated by individual reference as fully set forth herein. The content is neither generated by, nor subject to approval or verification of accuracy by, the Clerk of the Board of Supervisors.

Paula Katz submitted the following statement during Public Comment, as follows: "I urge you not to accept the upzoning plan without significant amendments: 1. Require any plan to include 20-25% of on-site affordable housing, along with more two and three bedroom family units. And 100% affordable housing should be required on publicly owned lands. 2. All rent controlled buildings must be excluded from the plan. 3. Require sufficient parking for all upzoned buildings so their new residents will not have to compete with current residents already struggling to find limited street parking. 4. Remove overlapping base and density maps and excessive height bonuses that allow state density bonus incentives, including very high buildings. 5. Support small businesses affected by upzoning, and don't allow locations with legacy businesses to be upzoned."

LAND USE AND TRANSPORTATION COMMITTEE
CITY AND COUNTY OF SAN FRANCISCO

MEETING MINUTES - DRAFT

Monday, November 3, 2025 - 1:30 PM

City Hall, Legislative Chamber, Room 250

Regular Meeting

Members: Myrna Melgar, Chyanne Chen, Bilal Mahmood

Clerk: John Carroll

(415) 554-4445 ~ john.carroll@sfgov.org

Angela Calvillo, Clerk of the Board

BOARD COMMITTEES

Committee Membership	Meeting Days
Budget and Appropriations Committee Supervisors Chan, Dorsey, Walton, Mandelman	Wednesday 1:30 PM
Budget and Finance Committee Supervisors Chan, Dorsey	Wednesday 10:00 AM
Government Audit and Oversight Committee Supervisors Fielder, Sauter, Sherrill	1st and 3rd Thursday 10:00 AM
Land Use and Transportation Committee Supervisors Melgar, Chen, Mahmood	Monday 1:30 PM
Public Safety and Neighborhood Services Committee Supervisors Dorsey, Mahmood, Sauter	2nd and 4th Thursday 10:00 AM
Rules Committee Supervisors Walton, Sherrill, Mandelman	Monday 10:00 AM

First-named Supervisor is Chair, Second-named Supervisor is Vice-Chair of the Committee.

Members Present: Myrna Melgar, Chyanne Chen, and Bilal Mahmood

The Land Use and Transportation Committee met in regular session on Monday, November 3, 2025, with Chair Myrna Melgar presiding. Chair Melgar called the meeting to order at 1:32 p.m.

ROLL CALL AND ANNOUNCEMENTS

On the call of the roll, Chair Melgar, Vice Chair Chen, and Member Mahmood were noted present. A quorum was present.

COMMUNICATIONS

John Carroll, Land Use and Transportation Committee Clerk, instructed members of the public that public comment is taken on each item on the agenda. Alternatively, written comments may be submitted through email (john.carroll@sfgov.org) or the U.S. Postal Service at City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102.

AGENDA CHANGES

There were no agenda changes.

REGULAR AGENDA

Chair Melgar requested that File Nos. 250426 and 250427 be heard together.

250426 [Planning Code, Zoning Map - San Francisco Gateway Special Use District]

Sponsors: Walton; Fielder, Chen, Melgar and Dorsey

Ordinance amending the Planning Code and the Zoning Map to establish the San Francisco Gateway Special Use District generally bounded by Kirkwood Avenue to the northeast, Rankin Street to the southeast, McKinnon Avenue to the southwest, and Toland Street to the northwest; making findings under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings of public necessity, convenience, and welfare under Planning Code, Section 302.
(Economic Impact; No Economic Impact Analysis Report)

Heard in Committee. Speaker(s): Supervisor Shamann Walton (Board of Supervisors); Susan Ma (Office of Economic and Workforce Development); presented information and answered questions raised throughout the discussion. Rev. Dr. Carolyn Ransom-Scott; Lindsay Palmer; Michael; Speaker; Vanessa; Kristin Hardy; Dan Torres; Rudy Gonzalez (San Francisco Building & Construction Trades Council); Raymond Tan; spoke in support of the ordinance matter. Steve Zeltzer; spoke in opposition to the ordinance matter. Francisco Da Costa; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be RECOMMENDED. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250427 [Development Agreement - Prologis, L.P. - San Francisco Gateway Project - Toland Street at Kirkwood Avenue]

Sponsors: Walton; Fielder, Chen, Melgar and Dorsey

Ordinance approving a Development Agreement between the City and County of San Francisco and Prologis, L.P., a Delaware limited partnership, for the development of an approximately 17.1-acre site located at Toland Street at Kirkwood Avenue with two multi-story production, distribution, and repair buildings in a core industrial area, including 1,646,000 square feet of production, distribution, and repair, space for non-retail sales and service, automotive, and retail uses, a rooftop solar array, ground-floor maker space, and streets built to City standard; making findings under the California Environmental Quality Act; making findings of conformity with the General Plan, and with the eight priority policies of Planning Code, Section 101.1(b); making findings of public convenience, necessity, and welfare under Planning Code, Section 302; approving certain development impact fees for the Project and waiving certain Planning Code fees and requirements; confirming compliance with or waiving certain provisions of Labor and Employment Code, Articles 131, 132, 103, 104, and 106, and Administrative Code, Chapters 56, 14B, 82, 83, and 23; and ratifying certain actions taken in connection therewith, as defined herein.
(Economic Impact; No Economic Impact Analysis Report)

Heard in Committee. Speaker(s): Supervisor Shamann Walton (Board of Supervisors); Susan Ma (Office of Economic and Workforce Development); presented information and answered questions raised throughout the discussion. Rev. Dr. Carolyn Ransom-Scott; Lindsay Palmer; Michael; Speaker; Vanessa; Kristin Hardy; Dan Torres; Rudy Gonzalez (San Francisco Building & Construction Trades Council); Raymond Tan; spoke in support of the ordinance matter. Steve Zeltzer; spoke in opposition to the ordinance matter. Francisco Da Costa; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be RECOMMENDED. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250886 [Planning Code - Adaptive Reuse of Historic Buildings]

Sponsor: Mayor

Ordinance amending the Planning Code to allow additional uses as principally or conditionally permitted in Historic Buildings citywide, exempt Historic Buildings in certain Eastern Neighborhood Plan Areas from Conditional Use authorization otherwise required to remove Production, Distribution, and Repair (PDR), Institutional Community, and Arts Activities uses, and from providing replacement space for such uses, make conforming amendments to provisions affected by the foregoing, including zoning control tables; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1, and making findings of public necessity, convenience, and general welfare under Planning Code, Section 302.

Heard in Committee. Speaker(s): Lisa Gluckstein (Planning Department); presented information and answered questions raised throughout the discussion. Speaker; Speaker; Romalyn Schmaltz; Apollo; Pat Huey; Heather Davies; Raymond Tan; Speaker; Speaker; Speaker; Speaker; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be CONTINUED TO CALL OF THE CHAIR. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250888 [Planning Code - Planning Fees]

Sponsors: Mayor; Dorsey

Ordinance amending the Planning Code to require certain Planning Department fees to be paid to the Department at the time the Development Application is submitted, modify the environmental review fees for large projects, and remove the separate fee schedule for "Class 32" categorical exemptions under the California Environmental Quality Act; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings of public necessity, convenience, and welfare pursuant to Planning Code, Section 302.

Heard in Committee. Speaker(s): Veronica Flores (Planning Department); presented information and answered questions raised throughout the discussion. Speaker; Romalyn Schmaltz; Speaker; spoke in opposition to the ordinance matter. Raymond Tan; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be RECOMMENDED AS COMMITTEE REPORT. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

Supervisor Mandelman was noted present at 2:06 p.m.

Supervisor Sauter was noted present at 2:23 p.m.

SPECIAL MEETING OF THE BOARD OF SUPERVISORS

Supervisor Chan was noted present at 2:25 p.m., thereby constituting a quorum of the Board of Supervisors. A special meeting of the Board of Supervisors was convened at 2:25 p.m., and maintained sporadically throughout the meeting through 4:24 p.m., although the meeting was conducted in all respects as a committee meeting for items on the agenda and any substantive decisions constitute a recommendation of the committee and not action taken by the board.

Present: Supervisors Melgar, Chen, Mahmood, Mandelman, Sauter, and Chan.

Supervisor Dorsey was noted present at 2:50 p.m.

Supervisor Sherrill was noted present at 3:46 p.m.

250808 [Planning Code; Administrative Code - Legacy Businesses in Neighborhood Commercial Districts]

Sponsor: Chan

Ordinance amending the Planning Code to define Legacy Business and to require conditional use authorization prior to replacing a Legacy Business with a new non-residential use in certain Neighborhood Commercial, Named Neighborhood Commercial, and Neighborhood Commercial Transit Districts, and in the Chinatown Mixed Use Districts; amending the Administrative Code to allow a business that has been operating for 15 years to qualify as a Legacy Business; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 302.

(Supervisor Mahmood dissented in committee.)

Heard in Committee. Speaker(s): Supervisor Connie Chan (Board of Supervisors); Lisa Gluckstein (Planning Department); presented information and answered questions raised throughout the discussion. George Wooding; Marc Bruno; Romalyn Schmaltz; Speaker; Yolanda; Gwen McLaughlin (Small Business Forward); Justin; Pat Huey; Speaker; Steven Torres; Andy Katz; Katherine Howard; Raymond Tan; Bridget Maley; Howard Wong; Speaker; spoke in support of the ordinance matter.

Vice Chair Chen moved that this Ordinance be RECOMMENDED. The motion carried by the following vote:

Ayes: 2 - Melgar, Chen
Noes: 1 - Mahmood

Chair Melgar requested that File Nos. 250966, 250700, 251071, 250701, 251073, and 250985 be heard together.

ADJOURNMENT OF THE BOARD OF SUPERVISORS

At the hour of 4:25 p.m., Supervisors Mandelman, Sauter, Chan, Dorsey and Sherrill were noted not present, thereby adjouring the Special Meeting of the Board of Supervisors.

250966 [General Plan Amendments - Family Zoning Plan]

Ordinance amending the General Plan to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; amending the City's Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 340. (Planning Commission)
(Pursuant to Charter, Section 4.105, the Planning Commission recommends General Plan amendments to the Board of Supervisors for approval or rejection. If the Board fails to act within 90 days of receipt, the proposed General Plan amendment shall be deemed approved. Transmittal Date: September 22, 2025)

Heard in Committee. Speaker(s): Ted Egan (Office of the Controller); Supervisors Connie Chan, Danny Sauter, Rafael Mandelman, and Matt Dorsey (Board of Supervisors); Joshua Switzky, Lisa Chen (Planning Department); presented information and answered questions raised throughout the discussion. George Wooding; Herbert Mintz; Ray Borraca; Speaker; Naj Daniels; Kristen Hardy; Marc Bruno; Julie Fisher; Jessica Visness; Tony Hallier; Romalyn Schmaltz; Apollo; John Huliman; Mike Casey; Randy Tan; Alden Weissman; Pat Huey; Speaker; Andy Katz; Carol Brewer; Lori Brooke; Bridget Manley; Donna Hurliss; Katherine Howard; Nick Ferriss, President (Telegraph Hill Dwellers); Niels Pierson; Kathleen Courtney; Eileen Hirst; George; Fred; Lisa Arges; Lila Holtzman; Speaker; Theresa; Speaker; Dan Wollette; Speaker; Speaker; Howard Wong; Gwen McLaughlin (Small Business Forward); Paul Conwright; P. Segal; Ruth Fergusson; Charlie Natoli; Mo Zu; Speaker; Annie Fryman (SPUR); Deborah Solomon; Speaker; Marie Joyce; Speaker; Brianna Morales (Housing Action Coalition); Witt Turner; Speaker; Speaker; Stan Hayes (Telegraph Hill Dwellers); Honest Charley Bodkin; Mike Chan; Speaker; Jane Natoli (YIMBY Action); Monica Morse (West of Twin Peaks Neighborhood Council); Speaker; Eric Brooks; Greg Jacino; Eileen Boken; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be CONTINUED to the Land Use and Transportation Committee meeting of November 17, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250700 [Zoning Map - Family Zoning Plan]

Sponsors: Mayor; Sauter, Mahmood and Dorsey

Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.
(Economic Impact)

Heard in Committee. Speaker(s): Ted Egan (Office of the Controller); Supervisors Connie Chan, Danny Sauter, Rafael Mandelman, and Matt Dorsey (Board of Supervisors); Joshua Switzky, Lisa Chen (Planning Department); presented information and answered questions raised throughout the discussion. George Wooding; Herbert Mintz; Ray Borraca; Speaker; Naj Daniels; Kristen Hardy; Marc Bruno; Julie Fisher; Jessica Visness; Tony Hallier; Romalyn Schmaltz; Apollo; John Huliman; Mike Casey; Randy Tan; Alden Weissman; Pat Huey; Speaker; Andy Katz; Carol Brewer; Lori Brooke; Bridget Manley; Donna Hurliss; Katherine Howard; Nick Ferriss, President (Telegraph Hill Dwellers); Niels Pierson; Kathleen Courtney; Eileen Hirst; George; Fred; Lisa Arges; Lila Holtzman; Speaker; Theresa; Speaker; Dan Wollette; Speaker; Speaker; Howard Wong; Gwen McLaughlin (Small Business Forward); Paul Conwright; P. Segal; Ruth Fergusson; Charlie Natoli; Mo Zu; Speaker; Annie Fryman (SPUR); Deborah Solomon; Speaker; Marie Joyce; Speaker; Brianna Morales (Housing Action Coalition); Witt Turner; Speaker; Speaker; Stan Hayes (Telegraph Hill Dwellers); Honest Charley Bodkin; Mike Chan; Speaker; Jane Natoli (YIMBY Action); Monica Morse (West of Twin Peaks Neighborhood Council); Speaker; Eric Brooks; Greg Jacino; Eileen Boken; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be CONTINUED to the Land Use and Transportation Committee meeting of November 17, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

251071 [Zoning Map - Family Zoning Plan]

Sponsors: Mayor; Sauter, Mahmood and Dorsey

Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C), except for properties located in the Priority Equity Geographies Special Use District ("PEG SUD"); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1, except for properties located in the PEG SUD; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2) , except for properties located in the PEG SUD; and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts, except for properties located in the PEG SUD; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District, except for properties located in the PEG SUD; 2) change the height limits on certain lots in the R-4 Height and Bulk District, except for properties located in the PEG SUD; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone south of Lincoln Way to R-4 Height and Bulk District; 2) reclassify certain properties south of Lincoln Way to RTO-C and Neighborhood Commercial District; and 3) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.
(Economic Impact)

Heard in Committee. Speaker(s): Ted Egan (Office of the Controller); Supervisors Connie Chan, Danny Sauter, Rafael Mandelman, and Matt Dorsey (Board of Supervisors); Joshua Switzky, Lisa Chen (Planning Department); presented information and answered questions raised throughout the discussion. George Wooding; Herbert Mintz; Ray Borraca; Speaker; Naj Daniels; Kristen Hardy; Marc Bruno; Julie Fisher; Jessica Visness; Tony Hallier; Romalyn Schmaltz; Apollo; John Huliman; Mike Casey; Randy Tan; Alden Weissman; Pat Huey; Speaker; Andy Katz; Carol Brewer; Lori Brooke; Bridget Manley; Donna Hurliss; Katherine Howard; Nick Ferriss, President (Telegraph Hill Dwellers); Niels Pierson; Kathleen Courtney; Eileen Hirst; George; Fred; Lisa Arges; Lila Holtzman; Speaker; Theresa; Speaker; Dan Wollette; Speaker; Speaker; Howard Wong; Gwen McLaughlin (Small Business Forward); Paul Conwright; P. Segal; Ruth Fergusson; Charlie Natoli; Mo Zu; Speaker; Annie Fryman (SPUR); Deborah Solomon; Speaker; Marie Joyce; Speaker; Brianna Morales (Housing Action Coalition); Witt Turner; Speaker; Speaker; Stan Hayes (Telegraph Hill Dwellers); Honest Charley Bodkin; Mike Chan; Speaker; Jane Natoli (YIMBY Action); Monica Morse (West of Twin Peaks Neighborhood Council); Speaker; Eric Brooks; Greg Jacino; Eileen Boken; shared various concerns regarding the ordinance matter.

Vice Chair Chen moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Pages 13-16, to delete certain parcels along Ocean Avenue from the changes in the ordinance. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

(Economic Impact)

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of November 17, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250701 [Planning, Business and Tax Regulations Codes - Family Zoning Plan]

Sponsor: Mayor

Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this Ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

(Economic Impact)

Heard in Committee. Speaker(s): Ted Egan (Office of the Controller); Supervisors Connie Chan, Danny Sauter, Rafael Mandelman, and Matt Dorsey (Board of Supervisors); Joshua Switzky, Lisa Chen (Planning Department); presented information and answered questions raised throughout the discussion. George Wooding; Herbert Mintz; Ray Borraca; Speaker; Naj Daniels; Kristen Hardy; Marc Bruno; Julie Fisher; Jessica Visness; Tony Hallier; Romalyn Schmaltz; Apollo; John Huliman; Mike Casey; Randy Tan; Alden Weissman; Pat Huey; Speaker; Andy Katz; Carol Brewer; Lori Brooke; Bridget Manley; Donna Hurliss; Katherine Howard; Nick Ferriss, President (Telegraph Hill Dwellers); Niels Pierson; Kathleen Courtney; Eileen Hirst; George; Fred; Lisa Arges; Lila Holtzman; Speaker; Theresa; Speaker; Dan Wollette; Speaker; Speaker; Howard Wong; Gwen McLaughlin (Small Business Forward); Paul Conwright; P. Segal; Ruth Fergusson; Charlie Natoli; Mo Zu; Speaker; Annie Fryman (SPUR); Deborah Solomon; Speaker; Marie Joyce; Speaker; Brianna Morales (Housing Action Coalition); Witt Turner; Speaker; Speaker; Stan Hayes (Telegraph Hill Dwellers); Honest Charley Bodkin; Mike Chan; Speaker; Jane Natoli (YIMBY Action); Monica Morse (West of Twin Peaks Neighborhood Council); Speaker; Eric Brooks; Greg Jacino; Eileen Boken; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 11, Lines 23-24, by inserting 'Except as provided in this Section 206.10, all HC-SF projects shall comply with Article 4 of the Planning Code.' The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

(Economic Impact)

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 17, Lines 15-18, by inserting '(4) Exclusions. In no event shall this Section 206.10 be interpreted as relieving a HC-SF project from complying with: Article 4 of the Planning Code other than as specified in this subsection (d); Section 202.17; any tenant protections contained elsewhere in the Planning Code, including Section 317 et seq.; or Chapter 37 of the Administrative Code.' The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood
(Economic Impact)

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 21, Lines 5-8 to read '(4) Units With Two or More Bedrooms. Projects that contain units with two or more bedrooms shall be permitted to include additional square footage, as set forth below: (A) 250 square feet for every two-bedroom unit provided in excess of the number of two-bedroom units required by subsection (d)(1)(B);' and making a conforming change on Line 25. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood
(Economic Impact)

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 27, Lines 5-9, to read '(c) Administrative Review. The Planning Department shall administratively review an HC-SF Project, unless the Project seeks a Major Modification pursuant to subsection (d), or any HC-SF Project that is a 100% Affordable HC-SF Project. The Planning Department's determination regarding an HC-SF Project under this subsection (c) shall not be appealable. Nothing in this Section 334 abrogates permit, license, or other requirements codified outside the Planning Code.' The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood
(Economic Impact)

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 29, Line 23 through Page 30, Line 9, to read '(4) The project does not demolish or substantially alter a historic resource that is: designated as a landmark or listed as a contributor to or located within a historic district under Article 10; listed as a Significant or Contributory Building under Article 11; listed in the California Register of Historical Resources or the National Register of Historic Places; identified in an adopted survey or historic context statement as potentially eligible for individual listing in the California Register of Historical Resources or the National Register of Historic Places; or, located within an historic district that is listed in, or identified in an adopted survey or historic context statement as potentially eligible for listing in, the California Register of Historical Resources or the National Register of Historic Places.' The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood
(Economic Impact)

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 31, Line 4, by inserting '(13) The project does not demolish or convert any portion of a Hotel.' The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood
(Economic Impact)

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 189, Lines 22-25, by striking '(12) Residential Flats. Notwithstanding anything to the contrary in this Section 317, projects that propose the Merger, reconfiguration, or reduction in size of Residential Flats shall not require a Conditional Use authorization if the project would increase the number of Dwelling Units on the property.' The motion carried by the following vote:

Ayes: 2 - Melgar, Chen
Noes: 1 - Mahmood

(Economic Impact)

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 190, Lines 8-10, by striking 'and in the case of demolition of any Residential Flats whether the proposed project is maintaining or increasing the number of units on the lot that contain at least two or more bedrooms or that are at least equivalent in size to the Residential Flats being demolished'. The motion carried by the following vote:

Ayes: 2 - Melgar, Chen

Noes: 1 - Mahmood

(Economic Impact)

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of November 17, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

251073 [Planning, Business and Tax Regulations, Administrative Codes - Family Zoning Plan]

Sponsor: Mayor

Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this Ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.
(Economic Impact)

Heard in Committee. Speaker(s): Ted Egan (Office of the Controller); Supervisors Connie Chan, Danny Sauter, Rafael Mandelman, and Matt Dorsey (Board of Supervisors); Joshua Switzky, Lisa Chen (Planning Department); presented information and answered questions raised throughout the discussion. George Wooding; Herbert Mintz; Ray Borraca; Speaker; Naj Daniels; Kristen Hardy; Marc Bruno; Julie Fisher; Jessica Visness; Tony Hallier; Romalyn Schmaltz; Apollo; John Huliman; Mike Casey; Randy Tan; Alden Weissman; Pat Huey; Speaker; Andy Katz; Carol Brewer; Lori Brooke; Bridget Manley; Donna Hurliss; Katherine Howard; Nick Ferriss, President (Telegraph Hill Dwellers); Niels Pierson; Kathleen Courtney; Eileen Hirst; George; Fred; Lisa Arges; Lila Holtzman; Speaker; Theresa; Speaker; Dan Wollette; Speaker; Speaker; Howard Wong; Gwen McLaughlin (Small Business Forward); Paul Conwright; P. Segal; Ruth Fergusson; Charlie Natoli; Mo Zu; Speaker; Annie Fryman (SPUR); Deborah Solomon; Speaker; Marie Joyce; Speaker; Brianna Morales (Housing Action Coalition); Witt Turner; Speaker; Speaker; Stan Hayes (Telegraph Hill Dwellers); Honest Charley Bodkin; Mike Chan; Speaker; Jane Natoli (YIMBY Action); Monica Morse (West of Twin Peaks Neighborhood Council); Speaker; Eric Brooks; Greg Jacino; Eileen Boken; shared various concerns regarding the ordinance matter.

Vice Chair Chen moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 14, Line 21, through Page 15, Line 14, to read '(B) Dwelling Unit Mix. Section 207.6 and Section 207.7 shall apply, except that projects between four and nine units shall comply with the following: (i) a project with four dwelling units shall contain at least one unit with two or more bedrooms; and (ii) for projects between five and nine dwelling units, at least 25 percent of units shall contain two or more bedrooms, including at least one unit with three or more bedrooms, unless Section 207.6(c) requires a higher percentage of two- and three-bedroom units.' The motion carried by

the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

(Economic Impact)

Vice Chair Chen moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING NEW TITLE, on Page 2, Lines 1-2, by inserting 'amending the Administrative Code to set Board policy regarding the sale or lease of properties within the SFMTA SUD'; on Page 10, Lines 23-25, by inserting '(y) This ordinance, in Section 16 amends the Administrative Code to set Board of Supervisors policy regarding the approval of the sale or lease of properties within the Non-Contiguous San Francisco Municipal Transportation Agency Special Use District.'; and on Page 471-472, by inserting 'Section 16. Article I of Chapter 2 of the Administrative Code is hereby amended by adding Section 2.6-4 to read as follows: SEC. 2.6-4. POLICY FOR APPROVAL OF LEASES OR SALE OF PROPERTY WITHIN THE NON-CONTIGUOUS SAN FRANCISCO MUNICIPAL TRANSPORTATION AGENCY SITES SPECIAL USE DISTRICT. (a) Whenever, in accordance with the provisions of the Charter, the San Francisco Municipal Transportation Agency ("SFMTA") submits a Non-Transit Lease or Sale Agreement to the Board of Supervisors for its approval or disapproval, it shall be the policy of the Board of Supervisors to only approve the Non-Transit Lease or Sale Agreement if: (i) it is for the development and operation of a 100% Affordable Housing Project; (ii) the SFMTA has provided each then-existing Qualified Nonprofit with a right of first refusal to lease or buy, as applicable, the affected property on the same terms in the Non-Transit Lease or Sale Agreement (which may include, but is not limited to, a rent or purchase price based on the highest and best use of the property), except the permitted use shall be modified to only permit the development and operation of a 100% Affordable Housing Project, and either (A) the SFMTA does not receive a bona fide acceptance of that offer from a Qualified Nonprofit within 14 calendar days, or (B) the SFMTA receives a bona fide acceptance within 14 calendar days from a Qualified Nonprofit, but that Qualified Nonprofit fails to sign the Non-Transit Lease or Sale Agreement within 30 days of submitting the bona fide acceptance; or (iii) the SFMTA Board of Directors has determined the Non-Transit Lease or Sale Agreement is needed to further the SFMTA's transit purposes and the Board of Supervisors affirms such determination. (b) A "100% Affordable Housing Project" shall be a residential project where all Residential Uses, except a manager's unit, are comprised solely of Dwelling Units or Group Housing bedrooms that are restricted for the Life of the Project as Affordable Units and meets the requirements in Planning Code Section 406(b)(1)(A) and (C). For purposes of this subsection (b), the terms "Affordable Unit" and "Life of the Project" are as defined in Planning Code Section 401, and the terms Residential Use, Dwelling Unit, and Group Housing are as defined in Planning Code Section 102. (c) A "Non-Transit Lease or Sale Agreement" means an agreement to lease or buy property located within the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District, established in Planning Code Section 249.11, to develop and operate a residential or commercial project. (d) "Qualified Nonprofit" shall be a nonprofit organization that meets the requirements set forth in Administrative Code Section 41B.4 and is listed on the Mayor's Office of Housing and Economic Development's website pursuant to Section 41B.4.' The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD), 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; amending the Administrative Code to set Board policy regarding the sale or lease of properties within the SFMTA SUD; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.
(Economic Impact)

Vice Chair Chen moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Pages 170-171, by inserting '(d) Pre-Application Requirements. When a Development Application is submitted pursuant to this Section 249.11 for a site that meets the minimum specifications for 100% affordable housing sites as determined by the Mayor's Office of Housing and Community Development, the project sponsor, in conjunction with SFMTA, shall provide: (1) A feasibility study that models the development of the project site as 100% affordable housing, as that term is defined in Section 406(b)(1)(A) and (C); (2) Documentation that the project sponsor, in conjunction with SFMTA, has conducted at least one pre-application meeting. Mailed notice of the meeting shall be provided to the individuals and neighborhood organizations specified in Planning Code Section 333(e)(2)(A) and (C), as well as posted notice as set forth in Planning Code Section 333(e)(1). The Planning Department may establish procedures and requirements to administer this subsection; and (3) Documentation of how the project advances the City's goals for affordable housing on public lands, as identified in Housing Element Policy Actions 1.2.6 and 1.2.7.' The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood
(Economic Impact)

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of November 17, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250985 [Local Coastal Program Amendment - Family Zoning Plan]

Sponsor: Mayor

Resolution transmitting to the California Coastal Commission for review and certification an amendment to the Implementation Program and Land Use Plan of the City's certified Local Coastal Program to implement the Family Zoning Plan; and affirming the Planning Department's determination under the California Environmental Quality Act.

Heard in Committee. Speaker(s): Ted Egan (Office of the Controller); Supervisors Connie Chan, Danny Sauter, Rafael Mandelman, and Matt Dorsey (Board of Supervisors); Joshua Switzky, Lisa Chen (Planning Department); presented information and answered questions raised throughout the discussion. George Wooding; Herbert Mintz; Ray Borraca; Speaker; Naj Daniels; Kristen Hardy; Marc Bruno; Julie Fisher; Jessica Visness; Tony Hallier; Romalyn Schmaltz; Apollo; John Huliman; Mike Casey; Randy Tan; Alden Weissman; Pat Huey; Speaker; Andy Katz; Carol Brewer; Lori Brooke; Bridget Manley; Donna Hurliss; Katherine Howard; Nick Ferriss, President (Telegraph Hill Dwellers); Niels Pierson; Kathleen Courtney; Eileen Hirst; George; Fred; Lisa Arges; Lila Holtzman; Speaker; Theresa; Speaker; Dan Wollette; Speaker; Speaker; Howard Wong; Gwen McLaughlin (Small Business Forward); Paul Conwright; P. Segal; Ruth Fergusson; Charlie Natoli; Mo Zu; Speaker; Annie Fryman (SPUR); Deborah Solomon; Speaker; Marie Joyce; Speaker; Brianna Morales (Housing Action Coalition); Witt Turner; Speaker; Speaker; Stan Hayes (Telegraph Hill Dwellers); Honest Charley Bodkin; Mike Chan; Speaker; Jane Natoli (YIMBY Action); Monica Morse (West of Twin Peaks Neighborhood Council); Speaker; Eric Brooks; Greg Jacino; Eileen Boken; shared various concerns regarding the resolution matter.

Chair Melgar moved that this Resolution be CONTINUED to the Land Use and Transportation Committee meeting of November 17, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

ADJOURNMENT

There being no further business, the Land Use and Transportation Committee adjourned at the hour of 6:48 p.m.

N.B. The Minutes of this meeting set forth all actions taken by the Land Use and Transportation Committee on the matters stated, but not necessarily in the chronological sequence in which the matters were taken up.

LAND USE AND TRANSPORTATION COMMITTEE
CITY AND COUNTY OF SAN FRANCISCO

MEETING MINUTES - DRAFT

Monday, November 17, 2025 - 1:30 PM

City Hall, Legislative Chamber, Room 250

Regular Meeting

Members: Myrna Melgar, Chyanne Chen, Bilal Mahmood

Clerk: John Carroll

(415) 554-4445 ~ john.carroll@sfgov.org

Angela Calvillo, Clerk of the Board

BOARD COMMITTEES

Committee Membership	Meeting Days
Budget and Appropriations Committee Supervisors Chan, Dorsey, Walton, Mandelman	Wednesday 1:30 PM
Budget and Finance Committee Supervisors Chan, Dorsey	Wednesday 10:00 AM
Government Audit and Oversight Committee Supervisors Fielder, Sauter, Sherrill	1st and 3rd Thursday 10:00 AM
Land Use and Transportation Committee Supervisors Melgar, Chen, Mahmood	Monday 1:30 PM
Public Safety and Neighborhood Services Committee Supervisors Dorsey, Mahmood, Sauter	2nd and 4th Thursday 10:00 AM
Rules Committee Supervisors Walton, Sherrill, Mandelman	Monday 10:00 AM

First-named Supervisor is Chair, Second-named Supervisor is Vice-Chair of the Committee.

Members Present: Myrna Melgar, Chyanne Chen, and Bilal Mahmood

The Land Use and Transportation Committee met in regular session on Monday, November 17, 2025, with Chair Myrna Melgar presiding. Chair Melgar called the meeting to order at 1:35 p.m.

ROLL CALL AND ANNOUNCEMENTS

On the call of the roll, Chair Melgar, Vice Chair Chen, and Member Mahmood were noted present. A quorum was present.

COMMUNICATIONS

John Carroll, Land Use and Transportation Committee Clerk, instructed members of the public that public comment is taken on each item on the agenda. Alternatively, written comments may be submitted through email (john.carroll@sfgov.org) or the U.S. Postal Service at City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102.

AGENDA CHANGES

There were no agenda changes.

REGULAR AGENDA

250811 [Building Code - Building Permit Expiration Timelines]

Sponsors: Mahmood; Dorsey

Ordinance amending the Building Code to revise the timing of expiration of certain building permits and building permit applications; and affirming the Planning Department's determination under the California Environmental Quality Act.

Heard in Committee. Speaker(s): Tate Hanna (Department of Building Inspection); presented information and answered questions raised throughout the discussion. Joseph Smooke; shared various concerns regarding the ordinance matter.

Member Mahmood moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 1, Line 22, through Page 2, Line 7, to read '(c) No local findings are required under California Health and Safety Code Section 17958.7 because the amendments to the Building Code contained in this ordinance do not regulate materials or manner of construction or repair and therefore do not modify building standards. Even if the amendments are considered modifications to building standards, the amendments to building permit expiration timelines are not new, local building standards because they largely revert to or conform with the underlying provisions of the California Building Code. All amendments are consistent with the intent of recently enacted Assembly Bill 130, which is intended to prohibit local building standards applicable to residential units that are more restrictive than the California Building Code, and are also permissible because they would result in reductions in operating costs for the Department of Building Inspection. (Health & Safety Code § 17958.5(c)(6)(D)).'; on Page 3, Line 8, through Page 4, Line 16, to read '106A.3.7 Application expiration. The Building Official may hold in abeyance or reject any application, plans, or specifications filed which in the Building Official's opinion, do not provide the necessary information in a clear and concise manner as required in Section 106A.3.3. An application for a permit for any proposed work shall be deemed to have been abandoned, and shall expire, 730 days after the date of filing if no permit has been issued, except that the Building Official may grant one or more extensions of time for additional periods not exceeding 180 days each. Such extension shall be requested in writing and shall demonstrate justifiable cause for the extension. See Section 110A, Table 1A-J – Miscellaneous Fees – for applicable fee for such extensions. In the event the application has not been approved and issued within 60 days before the end of the time periods set forth in this Section 106A.3.7, the Department shall notify the applicant that the application will be canceled in 60 days unless the application is extended. An application which exceeds the stated or extended time period after such notice shall be deemed canceled without further action by the Department.'; on Page 4, Lines 18-25, by striking exceptions 1 and 2, '1. For applications resulting from enforcement actions initiated by the Building Official to abate code violations, the above time limits shall be reduced to 30 days and 10 days, respectively. The Building Official may grant an extension for hardship or procedural error. Upon cancellation, such cases shall be referred to the City Attorney for legal action. 2.The above time limits shall not apply to applications which are subject to the work without permit investigation fee per Section 110A, Table 1A-K – Penalties, Hearings, Code Enforcement Assessments. Such applications shall be canceled only through specific action by the Building Official.'; and making clerical and conforming amendments throughout the ordinance text. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

Member Mahmood moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of December 1, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

240637 [Planning Code, Zoning Map - Central Neighborhoods Large Residence SUD, Corona Heights Large Residence SUD]

Sponsor: Mandelman

Ordinance amending the Planning Code to expand the boundaries of the Central Neighborhoods Large Residence Special Use District (SUD), and to apply its controls to all lots within the SUD, with some exceptions; to delete the Corona Heights Large Residence SUD, and as a result to merge it into the Central Neighborhoods Large Residence SUD; amending the Zoning Map to reflect the deletion and boundary expansion; affirming the Planning Department's determination under the California Environmental Quality Act; and making public necessity, convenience, and welfare findings under Planning Code, Section 302, and findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1.

Heard in Committee. Speaker(s): Supervisor Rafael Mandelman (Board of Supervisors); Aaron Starr (Planning Department); presented information and answered questions raised throughout the discussion. Georgia Schuttish; Paul Wormer; Raymond Tan; shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, on Page 6, Line 16, through Page 7, Line 18, by striking '(e) Conditional Use Authorizations. For all lots zoned RH wWithin the Central Neighborhoods Large Residence Special Use District, a Conditional Use authorization shall be required for any residential development or expansion of a Residential Building that would result in any Dwelling Unit with a Gross Floor Area exceeding the equivalent of a 1.2:1 Floor Area Ratio, or would result in any Dwelling Unit exceeding 3,000 square feet of Gross Floor Area, except where the total increase of gross floor area of any existing Dwelling Unit is less than 15%. (f) Conditional Use Findings. In addition to the criteria outlined in Planning Code Section 303(c)(1), in acting upon an application for Conditional Use authorization within the Central Neighborhoods Large Residence Special Use District the Planning Commission shall also consider whether facts are presented to establish, based on the record before the Commission, that the following criteria are met: (1) the proposed project is contextual with the neighborhood, meets applicable Residential Design Guidelines, and seeks to retain any existing design elements; (2) the proposed project does not remove Rental Units subject to the Residential Rent Stabilization and Arbitration Ordinance; (3) the proposed project increases the number of Dwelling Units on the lot; (4) no Dwelling Unit is less than one-third the gross floor area of the largest Dwelling Unit in a Residential Building; (5) the proposed project does not negatively impact the historic integrity of the property or any existing structure on a lot that is listed in or formally eligible for listing in the California Register of Historic Resources, or has been determined to appear eligible for listing in the California Register of Historic Resources or to qualify as a "historical resource" under CEQA; and (6) the project does not negatively impact the historic integrity of any existing structure on a lot that has been adopted as a local landmark or a contributor to a local historic district under Articles 10 or 11 of this Code, or would render the property ineligible for historic designation as an individual or contributing resource.'; on Page 7, Lines 23-25, to read '(2) In multi-unit buildings, shared spaces such as stairwells, atriums, and other communal spaces accessible to all building occupants shall not be included in the Gross Floor Area thresholds'; on Page 8, Lines 6-12, by striking '(h) The Conditional Use requirement established by subsections (e)-(f) of this Section 249.92 shall sunset on December 31, 2024. After that date, for all lots zoned RH within the Central Neighborhoods Large Residence Special Use District, no residential development or expansion of an existing Residential Building shall be permitted within the Central Neighborhoods Large Residence Special Use District that would result in any Dwelling Unit exceeding 3,000 square feet of Gross Floor Area, except where the total increase of gross floor area of any existing Dwelling Unit is less than 15%.'; and making conforming and clerical amendments throughout the ordinance text. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of December 1, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250926 [Planning, Administrative Codes - Tenant Protections Related to Residential Demolitions and Renovations]

Sponsors: Chen; Fielder, Walton, Chan, Dorsey, Sauter, Sherrill, Melgar and Mahmood

Ordinance amending the Planning Code to 1) require property owners seeking to demolish residential units to replace all units that are being demolished; 2) require relocation assistance to affected occupants of those units, with additional assistance and protections for lower-income tenants; 3) modify the conditional use criteria that apply to projects to demolish residential units; amending the Administrative Code to 4) require landlords to provide additional relocation assistance to lower-income tenants who are being required to vacate temporarily due to capital improvements or rehabilitation work; 5) update the standards and procedures for hearings related to tenant harassment; 6) require additional disclosures in buyout agreements; 7) making various non-substantive changes and clarifications; affirming the Planning Department's determination under the California Environmental Quality Act; making public necessity, convenience, and welfare findings under Planning Code, Section 302; and making findings of consistency with the General Plan and the eight priority policies of Planning Code, Section 101.1.

Heard in Committee. Speaker(s): Malena Leon-Farrera and Rachel Tanner (Planning Department); presented information and answered questions raised throughout the discussion. Marc Bruno; Mark Solomon; Sarah "Fred" Sherburn-Zimmer (Housing Rights Committee); David Harlan; Speaker; Speaker; Teresa Dulalas (SOMCAN); Julie Fischer; Kay Walker; Avdi; Zach Weisenberger (Young Community Developers); Aristos Kemiji (Mission Economic Development Agency); Susan Marsh; Georgia Schuttish; Gwen; Joseph Smooke; Peter Stevens; Pauline Worshell; Gen Fujioka; Howard Willies; Speaker; Ocean Blue Coast; Zach Frial (SOMCAN); Asia Nicole Duncan; Christin Evans (Small Business Forward); Speaker; Mitchell Omerberg; Brianna Morales (Housing Action Coalition); Romalyn Schmaltz; Speaker; Alice Mosely; Raymond Tan; shared various concerns regarding the ordinance matter.

Supervisor Mahmood requested to be added as a co-sponsor.

Vice Chair Chen moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING NEW TITLE, on Page 1, Lines 4-7, to read '2) require relocation assistance to affected occupants of those units and to former occupants who vacated due to harassment, improper buyout agreements, owner move-ins, or pursuant to the Ellis Act'; on Page 1, Lines 13-14, by inserting '7) require an additional disclosure in notice of intent to withdraw units under the Ellis Act'; on Page 3, Lines 21-25, by inserting '(c) This Ordinance also includes a requirement that a landlord withdrawing a unit under the Ellis Act must state whether they intend to demolish the unit within the next five years. This statement would be for informational purposes only: it is not intended to create a substantive defense to an eviction, but it will be helpful for the City to understand the impacts of SB 330 and to manage tenant displacements.'; on Page 8, Line 11, through Page 9, Line 5, to read '(2) Outside the Priority Equity Geographies Special Use District, any Development Application that seeks authorization for Removal of one or more Residential or Unauthorized Units is required to obtain Conditional Use authorization unless it meets all the following criteria: (A) The project sponsor certifies under penalty of perjury that any units to be demolished are not tenant occupied and are without a history of evictions under Administrative Code Sections 37.9(a)(8)-(12), (14), or (17) within the last ten years, and have not been vacated within the past ten years pursuant to a Buyout Agreement, as defined in Administrative Code Section 37.9E, as it may be amended from time to time, regardless of whether the Buyout Agreement was filed with the Rent Board pursuant to Administrative Code Section 37.9E(h); (B) No units would be removed or demolished that are: (i) subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower- or very low-income within the past ten years; or (ii) subject to limits on rent increases under the Residential Rent Stabilization and Arbitration Ordinance (Chapter 37 of the Administrative Code) within the past ten years; or (iii) rented by lower- or very low-income households within the past ten years'; on Page 14, Lines 8-22, to read '(B) The project does not propose changes to more than 20% of the character defining features of a building that is designated as a landmark under Article 10, is listed as a contributor to an historic district in Article 10, is listed as a Significant or Contributory Building under Article 11, is listed in the California Register of Historical Resources, or is listed on the National Register of Historic Places. (C) The project increases

the number of Residential Units subject to the rent increase limitations of the Residential Rent Stabilization and Arbitration Ordinance (Chapter 37 of the Administrative Code) compared to the number of existing Residential Units and Unauthorized Units subject to the rent increase limitations of the Residential Rent Stabilization and Arbitration Ordinance. (D) The project does not require the Residential Demolition of existing, deed-restricted, affordable and/or below market rate housing, or increases the number of permanently Affordable Units located on the site.'; on Page 17, Lines 15-22, to read 'The Planning Commission shall approve, and the Planning Department shall publish on its website, a Replacement Unit Implementation Document (hereafter, the "Implementation Document") containing procedures, regulations, guidelines, notice formats, and application forms, as deemed necessary to assist the Department in ensuring that the relocation assistance and services in this Section 317.2 are available to displaced tenants, as required, and with implementation, monitoring, and enforcement of the policies and procedures of this Section 317.2. The Department may update the Implementation Document from time to time and shall seek Planning Commission approval for any significant changes.'; on Page 18, Line 12, though Page 19, Line 13, to read '"Demolition" is defined as "Residential Demolition" in Section 317(b)(2). "Existing Occupant" shall mean a Tenant of a unit at the time the owner of a unit applied to demolish the unit or recovered possession of the unit in order for the unit to be demolished. A Tenant occupying a unit on the date the project sponsor submitted a Development Application or preliminary application to demolish that unit shall be an Existing Occupant. If there is no Tenant occupying the unit on such date, the prior Tenant shall still qualify as an Existing Occupant for purposes of this Section 317.2 if any of the following circumstances are true as of the date the project sponsor submitted the Development Application or preliminary application: 1) the Tenant vacated the unit within the previous five years following a wrongful endeavor to recover possession of the unit through harassment under Administrative Section 37.9(l), where the Rent Board found the Tenant had vacated the unit because of the harassment or where the Rent Board made a finding of ongoing harassment and the tenant vacated within 12 months after said finding; the Tenant vacated the unit within the previous five years pursuant to a Buyout Agreement that did not substantially comply with the disclosure requirements set forth in Administrative Code Section 37.9E, subdivisions (d)(12) and (f)(5); 3) the Tenant vacated the unit within the previous three years pursuant to a notice to vacate under Administrative Code Section 37.9(a)(8); or 4) the Tenant vacated the unit within the previous five years pursuant to a notice to vacate under Administrative Code Section 37.9(a)(13).'; on Page 20, Lines 4-6, by inserting '"Tenant" is defined in Administrative Code Section 37.2(t) and shall include any lawful occupants of the unit, as well as any persons who have vacated the unit temporarily while the landlord is carrying out capital improvements or rehabilitation work.'; on Page 23, Lines 7-9, by inserting 'To ensure that Existing Occupants are provided the relocation assistance and services required by this Section 317.2'; on Page 24, Lines 2-3, by striking 'sent by certified mail and'; on Page 24, Line 6, by striking 'following receipt of the notice required by subsection (A)'; on Page 24, Lines 11-12, to read '(C) Right to Relocation Assistance. The Department shall ensure that Project sponsors provide relocation assistance to Existing Occupants as follows:'; on Page 30, Lines 6-12, to read '(f) Private Right of Action; Civil Penalties. (1) An aggrieved tenant, or any organization with tax exempt status under United States Code Section 501(c)(3) or 501(c)(4) that has a primary mission of protecting tenants in San Francisco may file a civil action for monetary damages and/or injunctive relief against any project sponsor, including any person(s) acting on their behalf and any successors-in-interest, to enforce violations of this Section 317.2.'; on Page 42, Lines 4-5, by inserting 'Information related to a tenant's source of income shall be treated as confidential information.'; on Page 46, Lines 11-12, by striking '(C) The alleged harassment is so severe that it has materially impacted a tenant's enjoyment of the unit'; on Page 46, Line 19, through Page 47, Line 2, to read '(3) The Executive Director shall schedule any such hearing within 45 days after receipt of the report of alleged harassment, or as soon as practicable thereafter. Both the tenant and the landlord may appear at the hearing and make oral and/or written presentations, including presentation of other witnesses. Following such hearing, the Administrative Law Judge shall issue findings and conclusions in regard to whether harassment occurred that was severe enough that it materially impacted the tenant's enjoyment of the unit, and in the case of a prior tenant whether the prior tenant vacated the unit due to the harassment for purposes of Planning Code Section 317.2. The findings and conclusions may be appealed by either party to provide the Board under Section 37.8.'; on Page 49, Lines 8-9, by inserting 'The notice shall also disclose for informational purposes only whether the landlord intends to demolish the accommodations within the next five years.'; on Page 50, Lines 19-23, by inserting '(F) With respect to notices of intent dated on or after the effective date of the ordinance in Board File No. 250926, whether the landlords intends to demolish within the next five years after the date of the notice

and a statement that the tenant may be entitled to additional protections in the event the unit is demolished pursuant to Planning Code Section 317.2, and that the tenant may keep their contact information on file with the Rent Board.'; and making clerical and conforming amendments throughout the ordinance text. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

Ordinance amending the Planning Code to 1) require property owners seeking to demolish residential units to replace all units that are being demolished; 2) require relocation assistance to affected occupants of those units and to former occupants who vacated due to harassment, improper buyout agreements, owner move-ins, or pursuant to the Ellis Act, with additional assistance and protections for lower-income tenants; 3) modify the conditional use criteria that apply to projects to demolish residential units; amending the Administrative Code to 4) require landlords to provide additional relocation assistance to lower-income tenants who are being required to vacate temporarily due to capital improvements or rehabilitation work; 5) update the standards and procedures for hearings related to tenant harassment; 6) require additional disclosures in buyout agreements; 7) require an additional disclosure in notice of intent to withdraw units under the Ellis Act; 8) making various non-substantive changes and clarifications; affirming the Planning Department's determination under the California Environmental Quality Act; making public necessity, convenience, and welfare findings under Planning Code, Section 302; and making findings of consistency with the General Plan and the eight priority policies of Planning Code, Section 101.1.

Vice Chair Chen moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of December 1, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

Chair Melgar requested that File Nos. 250966, 250700, 251071, 250701, 251073, and 250985 be heard together.

SPECIAL MEETING OF THE BOARD OF SUPERVISORS

Supervisors Chan, Mandelman, and Sherrill were noted present at 3:45 p.m., thereby constituting a quorum of the Board of Supervisors. A special meeting of the Board of Supervisors was convened at 3:45 p.m., although the meeting was conducted in all respects as a committee meeting for items on the agenda and any substantive decisions constitute a recommendation of the committee and not action taken by the board.

Present: Supervisors Melgar, Chen, Mahmood, Chan, Mandelman, and Sherrill.

ADJOURNMENT OF THE BOARD OF SUPERVISORS

At the hour of 4:15 p.m., Supervisor Mandelman was noted not present, thereby adjouring the Special Meeting of the Board of Supervisors.

Supervisor Chan was noted not present at 4:18 p.m.

Supervisor Sherrill was noted not present at 4:22 p.m.

Chair Melgar recessed the meeting beginning at 6:04 p.m., and reconvened the meeting at 6:10 p.m.

250966 [General Plan Amendments - Family Zoning Plan]

Ordinance amending the General Plan to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; amending the City's Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 340. (Planning Commission)
(Pursuant to Charter, Section 4.105, the Planning Commission recommends General Plan amendments to the Board of Supervisors for approval or rejection. If the Board fails to act within 90 days of receipt, the proposed General Plan amendment shall be deemed approved. Transmittal Date: September 22, 2025)

Heard in Committee. Speaker(s): Aly Bonde (Office of the Mayor); Joshua Switzky, Lisa Chen, Rachel Tanner, and Richard Sucre (Planning Department); Supervisors Rafael Mandelman, Connie Chan, and Stephen Sherrill (Board of Supervisors); Maia Small (San Francisco Municipal Transportation Agency); Brad Russi (Office of the City Attorney); presented information and answered questions raised throughout the discussion. Eileen Boken; Georgia Schuttish; Raymond Tan; Paul Wormer; Sarah "Fred" Sherburn-Zimmer (Housing Rights Committee); Jacinda McCann; Speaker; Marie Romero; Zachary Frial (SOMCAN); Theresa Dulales (SOMCAN); Jose Descansera; Christen Evans; Mark Solomon; Jessica Vistnes; Peter Stevens; Marc Bruno; Mary; Robert Ho (Ingleside Terrace Association); Speaker; Speaker; Romalyn Schmaltz; Brian Malnik; Speaker; Andy Katz; David Kim (SF YIMBY); Jenny Gephart; Stan Hayes; Stephen Torres; Kay Walker; Ocean; Speaker; John Gutterman; Nick Ferris, President (Telegraph Hill Dwellers); Speaker; Glendida Farley; Kate Bloomberg; Gwen; Speaker; Paul Michael; Gino Fortunado; Gabe; Erica; Tina Lombardi (San Francisco Heritage); Speaker; Sarah Rogers; Tina; Udya Singh; Corey Smith (Housing Action Coalition); Speaker; Jane Natoli (YIMBY Action); Speaker; Speaker; Phillip; Paula Katz; Mike Chen; Bobak Esfandiari (San Francisco Democratic Party Central Committee); Speaker; Speaker; Brianna Morales (Housing Action Coalition); Speaker; Brian Han; Jeantelle Labarinto; Speaker; Asia Nicole Duncan; Harris; Rosa Shields (San Francisco Labor Council); shared various concerns regarding the ordinance matter.

Chair Melgar moved that this Ordinance be CONTINUED to the Land Use and Transportation Committee meeting of December 1, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

250700 [Zoning Map - Family Zoning Plan]

Sponsors: Mayor; Sauter, Mahmood and Dorsey

Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.
(Economic Impact)

Heard in Committee. Speaker(s): Aly Bonde (Office of the Mayor); Joshua Switzky, Lisa Chen, Rachel Tanner, and Richard Sucre (Planning Department); Supervisors Rafael Mandelman, Connie Chan, and Stephen Sherrill (Board of Supervisors); Maia Small (San Francisco Municipal Transportation Agency); Brad Russi (Office of the City Attorney); presented information and answered questions raised throughout the discussion. Eileen Boken; Georgia Schuttish; Raymond Tan; Paul Wormer; Sarah "Fred" Sherburn-Zimmer (Housing Rights Committee); Jacinda McCann; Speaker; Marie Romero; Zachary Frial (SOMCAN); Theresa Dulales (SOMCAN); Jose Descansera; Christen Evans; Mark Solomon; Jessica Vistnes; Peter Stevens; Marc Bruno; Mary; Robert Ho (Ingleside Terrace Association); Speaker; Speaker; Romalyn Schmaltz; Brian Malnik; Speaker; Andy Katz; David Kim (SF YIMBY); Jenny Gephart; Stan Hayes; Stephen Torres; Kay Walker; Ocean; Speaker; John Gutterman; Nick Ferris, President (Telegraph Hill Dwellers); Speaker; Glendida Farley; Kate Bloomberg; Gwen; Speaker; Paul Michael; Gino Fortunado; Gabe; Erica; Tina Lombardi (San Francisco Heritage); Speaker; Sarah Rogers; Tina; Udya Singh; Corey Smith (Housing Action Coalition); Speaker; Jane Natoli (YIMBY Action); Speaker; Speaker; Phillip; Paula Katz; Mike Chen; Bobak Esfandiari (San Francisco Democratic Party Central Committee); Speaker; Speaker; Brianna Morales (Housing Action Coalition); Speaker; Brian Han; Jeantelle Labarinto; Speaker; Asia Nicole Duncan; Harris; Rosa Shields (San Francisco Labor Council); shared various concerns regarding the ordinance matter.

Vice Chair Chen moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING NEW TITLE, to exclude all currently designated historic landmarks and contributors to historic districts, pursuant to Article 10, from the rezoning plan. The motion carried by the following vote:

Ayes: 2 - Melgar, Chen
Noes: 1 - Mahmood

Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District , except for properties with structures designated as landmarks or contributors to historic districts pursuant to Article 10; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976. (Economic Impact)

Member Mahmood moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, to decrease heights along one block of Geary Blvd between Wood and Emerson; decrease heights at the Marina Safeway parcel; decrease heights at Ghirardelli Square; increase heights along the western portion of Van Ness between Ellis and Turk; increase heights along Pine Street between Leavenworth and Larkin Streets; and decrease heights on North Point Street between Larkin and Hyde streets. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District, except for properties with structures designated as landmarks or contributors to historic districts pursuant to Article 10; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976. (Economic Impact)

Vice Chair Chen moved that this Ordinance be AMENDED, to incorporate text from the duplicate file in Board File No. 251071, which would remove all Priority Equity Geographies from the rezoning plan. The motion FAILED by the following vote:

Ayes: 1 - Chen

Noes: 2 - Melgar, Mahmood

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of December 1, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

251071 [Zoning Map - Family Zoning Plan]

Sponsors: Mayor; Sauter, Mahmood and Dorsey

Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C), except for properties located in the Priority Equity Geographies Special Use District ("PEG SUD"); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1, except for properties located in the PEG SUD; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2) , except for properties located in the PEG SUD; and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts, except for properties located in the PEG SUD; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District, except for properties located in the PEG SUD; 2) change the height limits on certain lots in the R-4 Height and Bulk District, except for properties located in the PEG SUD; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone south of Lincoln Way to R-4 Height and Bulk District; 2) reclassify certain properties south of Lincoln Way to RTO-C and Neighborhood Commercial District; and 3) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.
(Economic Impact)

Heard in Committee. Speaker(s): Aly Bonde (Office of the Mayor); Joshua Switzky, Lisa Chen, Rachel Tanner, and Richard Sucre (Planning Department); Supervisors Rafael Mandelman, Connie Chan, and Stephen Sherrill (Board of Supervisors); Maia Small (San Francisco Municipal Transportation Agency); Brad Russi (Office of the City Attorney); presented information and answered questions raised throughout the discussion. Eileen Boken; Georgia Schuttish; Raymond Tan; Paul Wormer; Sarah "Fred" Sherburn-Zimmer (Housing Rights Committee); Jacinda McCann; Speaker; Marie Romero; Zachary Frial (SOMCAN); Theresa Dulales (SOMCAN); Jose Descansera; Christen Evans; Mark Solomon; Jessica Vistnes; Peter Stevens; Marc Bruno; Mary; Robert Ho (Ingleside Terrace Association); Speaker; Speaker; Romalyn Schmaltz; Brian Malnik; Speaker; Andy Katz; David Kim (SF YIMBY); Jenny Gephart; Stan Hayes; Stephen Torres; Kay Walker; Ocean; Speaker; John Gutterman; Nick Ferris, President (Telegraph Hill Dwellers); Speaker; Glendida Farley; Kate Bloomberg; Gwen; Speaker; Paul Michael; Gino Fortunado; Gabe; Erica; Tina Lombardi (San Francisco Heritage); Speaker; Sarah Rogers; Tina; Udya Singh; Corey Smith (Housing Action Coalition); Speaker; Jane Natoli (YIMBY Action); Speaker; Speaker; Phillip; Paula Katz; Mike Chen; Bobak Esfandiari (San Francisco Democratic Party Central Committee); Speaker; Speaker; Brianna Morales (Housing Action Coalition); Speaker; Brian Han; Jeantelle Labarinto; Speaker; Asia Nicole Duncan; Harris; Rosa Shields (San Francisco Labor Council); shared various concerns regarding the ordinance matter.

Member Mahmood moved that this Ordinance be TABLED. The motion carried by the following vote:

Ayes: 2 - Melgar, Mahmood
Noes: 1 - Chen

250701 [Planning, Business and Tax Regulations Codes - Family Zoning Plan]

Sponsor: Mayor

Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this Ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.
(Economic Impact)

Heard in Committee. Speaker(s): Aly Bonde (Office of the Mayor); Joshua Switzky, Lisa Chen, Rachel Tanner, and Richard Sucre (Planning Department); Supervisors Rafael Mandelman, Connie Chan, and Stephen Sherrill (Board of Supervisors); Maia Small (San Francisco Municipal Transportation Agency); Brad Russi (Office of the City Attorney); presented information and answered questions raised throughout the discussion. Eileen Boken; Georgia Schuttish; Raymond Tan; Paul Wormer; Sarah "Fred" Sherburn-Zimmer (Housing Rights Committee); Jacinda McCann; Speaker; Marie Romero; Zachary Frial (SOMCAN); Theresa Dulales (SOMCAN); Jose Descansera; Christen Evans; Mark Solomon; Jessica Vistnes; Peter Stevens; Marc Bruno; Mary; Robert Ho (Ingleside Terrace Association); Speaker; Speaker; Romalyn Schmaltz; Brian Malnik; Speaker; Andy Katz; David Kim (SF YIMBY); Jenny Gephart; Stan Hayes; Stephen Torres; Kay Walker; Ocean; Speaker; John Gutterman; Nick Ferris, President (Telegraph Hill Dwellers); Speaker; Glendida Farley; Kate Bloomberg; Gwen; Speaker; Paul Michael; Gino Fortunado; Gabe; Erica; Tina Lombardi (San Francisco Heritage); Speaker; Sarah Rogers; Tina; Udya Singh; Corey Smith (Housing Action Coalition); Speaker; Jane Natoli (YIMBY Action); Speaker; Speaker; Phillip; Paula Katz; Mike Chen; Bobak Esfandiari (San Francisco Democratic Party Central Committee); Speaker; Speaker; Brianna Morales (Housing Action Coalition); Speaker; Brian Han; Jeantelle Labarinto; Speaker; Asia Nicole Duncan; Harris; Rosa Shields (San Francisco Labor Council); shared various concerns regarding the ordinance matter.

Vice Chair Chen moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, to make conforming changes to exclude all currently designated historic landmarks and contributors to historic districts, pursuant to Article 10, from the rezoning plan. The motion carried by the following vote:

Ayes: 2 - Melgar, Chen

Noes: 1 - Mahmood

(Economic Impact)

Vice Chair Chen moved that this Ordinance be AMENDED, AN AMENDMENT OF THE WHOLE BEARING SAME TITLE, to incorporate text from the duplicate file in Board File No. 251073 to remove reduced unit mix requirements in the local program and defer to existing unit mix requirements in Planning Code, Sections 207.6 and 207.7. The motion carried by the following vote:

Ayes: 2 - Melgar, Chen

Noes: 1 - Mahmood

(Economic Impact)

Vice Chair Chen moved that this Ordinance be AMENDED, to incorporate text from the duplicate file in Board File No. 251073 related to the SFMTA Special Use District (SUD) which would add findings establishing the objective of prioritizing the Priority Equity Geographies sites in the SFMTA SUD for 100% affordable housing; add a pre-application process with a feasibility study to model those sites which satisfy minimum specifications as 100% affordable housing; require at least one publicly-noticed pre-application meeting; add findings of consistency with Housing Element Actions 1.2.6 and 1.2.7; and provide for a Right of First Refusal for qualified organizations. The motion FAILED by the following vote:

Ayes: 1 - Chen

Noes: 2 - Melgar, Mahmood

Chair Melgar moved that this Ordinance be CONTINUED AS AMENDED to the Land Use and Transportation Committee meeting of December 1, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

251073 [Planning, Business and Tax Regulations, Administrative Codes - Family Zoning Plan]

Sponsor: Mayor

Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD), 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; amending the Administrative Code to set Board policy regarding the sale or lease of properties within the SFMTA SUD; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.
(Economic Impact)

Heard in Committee. Speaker(s): Aly Bonde (Office of the Mayor); Joshua Switzky, Lisa Chen, Rachel Tanner, and Richard Sucre (Planning Department); Supervisors Rafael Mandelman, Connie Chan, and Stephen Sherrill (Board of Supervisors); Maia Small (San Francisco Municipal Transportation Agency); Brad Russi (Office of the City Attorney); presented information and answered questions raised throughout the discussion. Eileen Boken; Georgia Schuttish; Raymond Tan; Paul Wormer; Sarah "Fred" Sherburn-Zimmer (Housing Rights Committee); Jacinda McCann; Speaker; Marie Romero; Zachary Frial (SOMCAN); Theresa Dulales (SOMCAN); Jose Descansera; Christen Evans; Mark Solomon; Jessica Vistnes; Peter Stevens; Marc Bruno; Mary; Robert Ho (Ingleside Terrace Association); Speaker; Speaker; Romalyn Schmaltz; Brian Malnik; Speaker; Andy Katz; David Kim (SF YIMBY); Jenny Gephart; Stan Hayes; Stephen Torres; Kay Walker; Ocean; Speaker; John Gutterman; Nick Ferris, President (Telegraph Hill Dwellers); Speaker; Glendida Farley; Kate Bloomberg; Gwen; Speaker; Paul Michael; Gino Fortunado; Gabe; Erica; Tina Lombardi (San Francisco Heritage); Speaker; Sarah Rogers; Tina; Udya Singh; Corey Smith (Housing Action Coalition); Speaker; Jane Natoli (YIMBY Action); Speaker; Speaker; Phillip; Paula Katz; Mike Chen; Bobak Esfandiari (San Francisco Democratic Party Central Committee); Speaker; Speaker; Brianna Morales (Housing Action Coalition); Speaker; Brian Han; Jeantelle Labarinto; Speaker; Asia Nicole Duncan; Harris; Rosa Shields (San Francisco Labor Council); shared various concerns regarding the ordinance matter.

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Member Mahmood moved that this Ordinance be TABLED. The motion carried by the following vote:

Ayes: 2 - Melgar, Mahmood
Noes: 1 - Chen

250985 [Local Coastal Program Amendment - Family Zoning Plan]

Sponsor: Mayor

Resolution transmitting to the California Coastal Commission for review and certification an amendment to the Implementation Program and Land Use Plan of the City's certified Local Coastal Program to implement the Family Zoning Plan; and affirming the Planning Department's determination under the California Environmental Quality Act.

Heard in Committee. Speaker(s): Aly Bonde (Office of the Mayor); Joshua Switzky, Lisa Chen, Rachel Tanner, and Richard Sucre (Planning Department); Supervisors Rafael Mandelman, Connie Chan, and Stephen Sherrill (Board of Supervisors); Maia Small (San Francisco Municipal Transportation Agency); Brad Russi (Office of the City Attorney); presented information and answered questions raised throughout the discussion. Eileen Boken; Georgia Schuttish; Raymond Tan; Paul Wormer; Sarah "Fred" Sherburn-Zimmer (Housing Rights Committee); Jacinda McCann; Speaker; Marie Romero; Zachary Frial (SOMCAN); Theresa Dulales (SOMCAN); Jose Descansera; Christen Evans; Mark Solomon; Jessica Vistnes; Peter Stevens; Marc Bruno; Mary; Robert Ho (Ingleside Terrace Association); Speaker; Speaker; Romalyn Schmaltz; Brian Malnik; Speaker; Andy Katz; David Kim (SF YIMBY); Jenny Gephart; Stan Hayes; Stephen Torres; Kay Walker; Ocean; Speaker; John Gutterman; Nick Ferris, President (Telegraph Hill Dwellers); Speaker; Glendida Farley; Kate Bloomberg; Gwen; Speaker; Paul Michael; Gino Fortunado; Gabe; Erica; Tina Lombardi (San Francisco Heritage); Speaker; Sarah Rogers; Tina; Udya Singh; Corey Smith (Housing Action Coalition); Speaker; Jane Natoli (YIMBY Action); Speaker; Speaker; Phillip; Paula Katz; Mike Chen; Bobak Esfandiari (San Francisco Democratic Party Central Committee); Speaker; Speaker; Brianna Morales (Housing Action Coalition); Speaker; Brian Han; Jeantelle Labarinto; Speaker; Asia Nicole Duncan; Harris; Rosa Shields (San Francisco Labor Council); shared various concerns regarding the resolution matter.

Chair Melgar moved that this Resolution be CONTINUED to the Land Use and Transportation Committee meeting of December 1, 2025. The motion carried by the following vote:

Ayes: 3 - Melgar, Chen, Mahmood

ADJOURNMENT

There being no further business, the Land Use and Transportation Committee adjourned at the hour of 7:11 p.m.

N.B. The Minutes of this meeting set forth all actions taken by the Land Use and Transportation Committee on the matters stated, but not necessarily in the chronological sequence in which the matters were taken up.

San Francisco Family Zoning Program

HOUSING ELEMENT REZONING

San Francisco Planning

Josh Switzky
Deputy Director, Citywide Planning

Lisa Chen
Principal Planner, Plan Manager

LAND USE & TRANSPORTATION COMMITTEE

NOVEMBER 17, 2025

TODAY'S PRESENTATION

- Housing Capacity Calculations
- SB 79 Overview
- Summary

San Francisco's obligations under state law

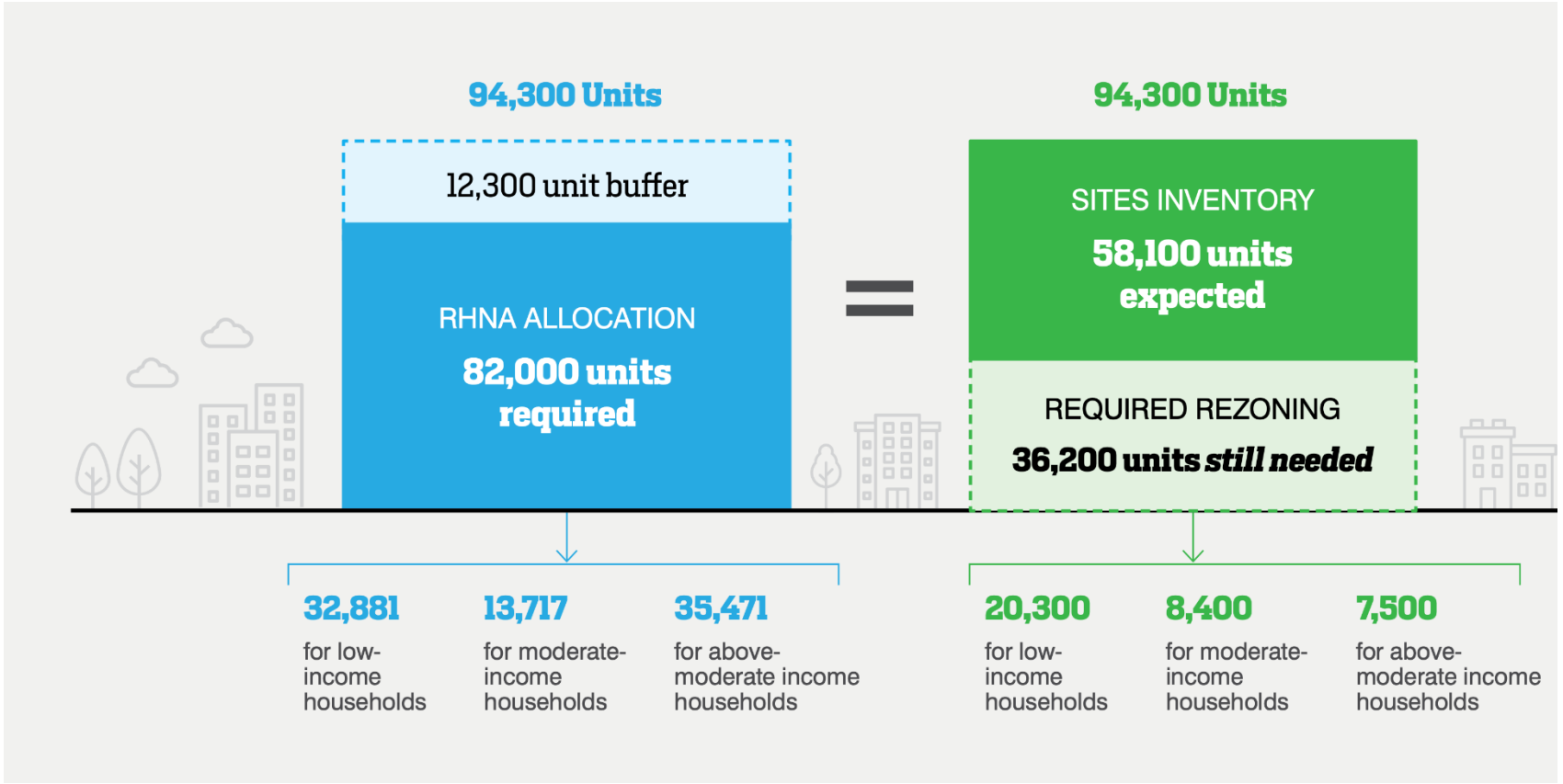
To maintain Housing Element certification, by January 2026 we must:

- Rezone for **realistic capacity** to meet our RHNA shortfall (36,200 units).
- Affirmatively Further Fair Housing by **zoning in high opportunity areas**.
- **Identify low-income housing sites** that will be eligible for ministerial approval.

NOTE:

Housing Element certification will not be revoked if planned units are not ultimately built.

Target: We have suitable & available sites for 36,200 homes



State Law: Calculating Realistic Capacity

To meet state law and Housing Element Action 7.1.1: SF must demonstrate that rezoning adds at least 36,200 units of capacity on **sites that are suitable and available**, using **methods that reasonably account for development likelihood.**

HCD issued a preliminary approval of the Plan on September 9th, noting that SF must continue use **all of these methods in combination** to demonstrate realistic capacity and meet various obligations:

Method	Analysis	Capacity
Citywide	Uses an annual pace of development relative to total zoned capacity.	**39,000 units** *(meets target of 36,200 units)*
Soft Sites	Excludes or discounts parcels based on current uses and other characteristics.	**40,000 – 64,000 units** *(meets target of 36,200 units)*
Feasibility	Computational model testing financial feasibility and economic conditions on each parcel.	**19,000 units** *(meets target of 16,000 moderate & above-moderate units)*

Method: Citywide Method

- Need this method to comply with HE 7.1.1 to supplement the "Soft Sites Analysis (method 2).
- Inspired by methodologies used in cases by the **State of CO, Terner Center, UCLA Lewis Center – concept of "zoning buffer"** of overall zoned capacity to housing targets
- Examines the **rate at which homes were approved** in the city from 2005 – 2023.
- Considers **how much zoned capacity was available** during that period and, of that zoned capacity, **how much (%) was entitled**.
- Annualizes that buildout to get a rate (%) of zoned capacity that we can say is likely to be built during the remainder of Housing Element cycle (5 years)
- Includes **RHNA shortfall across income groups**
- Assumes that we will do at least as well in our future as in our past

Citywide Housing Production Method	
Housing entitlements citywide 2005-2023	90,000
Current Remaining Total Zoned Capacity (2025)	313,000
Total	403,000
% capacity entitled	22%
Number of years	19
Annual	1%
% entitled in remaining RHNA period (5 yrs)	5%
Rezoning Net Increase to Total Zoned Capacity (Local Program)	780,000
Expected Net Approvals from Rezoning	**39,000**

Target: 36,200 homes likely within RHNA period

Method: Soft Sites Analysis

- Uses **similar assumptions submitted for rezoning in the adopted Housing Element** for consistency (requested by HCD)
- Necessary to **identify and filter specific sites** as required by HCD to meet test of **"suitable and available"**
- This method assumes:
  - 70% of capacity on "soft sites" (ie no existing units, built <30% of zoned capacity)
  - 2% of capacity on sites with existing units (min 5:1 allowed:existing)
- Excludes: Rent controlled buildings, sites w/pipeline projects, condo parcels, public properties, unusual parcels, listed historic resources

40k in Base

- Includes average use of SDB
- 26K VLI/LI, 14K Mod/Above

64k under Local Program

- 34K VLI/LI, 30K Mod/Above

Method: Financially Feasible

Urban Sim – online simulation tool to determine how many units are financially feasible.

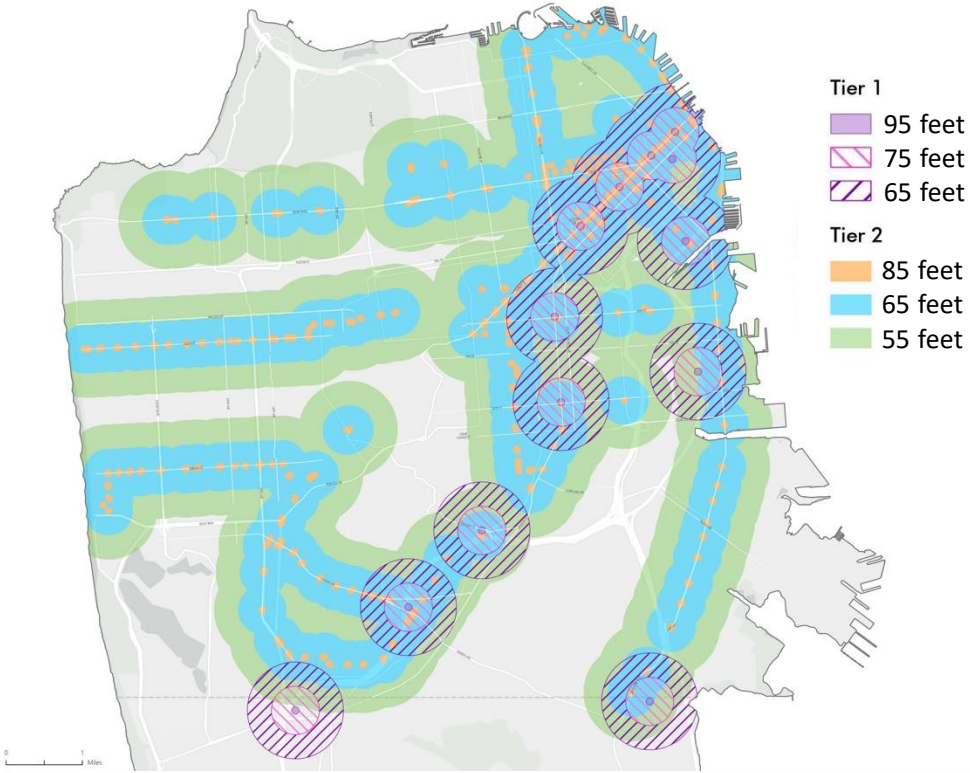
- Urban Sim runs a **proforma analysis on every parcel** using (1) economic assumptions, (2) allowed building envelope, (3) existing lot conditions, to determine for each lot the largest feasible project, if any.
- Helps us **understand how economic conditions impact the construction of moderate and above moderate homes** relative to our RHNA targets.
- Since most affordable housing relies on public subsidy instead of financial feasibility, this method provides limited information for how the city will meet its affordable targets.
- **Not all Financially Feasible Projects will be pursued during the RHNA period.** Discount factors must be applied. In "improved" financial conditions, as many as 221K units are feasible, but many are on sites with homes or other conditions that must be accounted for.

19,000 – 47,000 likely units

Target: 16,000 Mod/Above Mod on sites suitable and available during the RHNA period

Senate Bill 79 (SB 79): Applies after July 1, 2026

- **SETS MINIMUM HEIGHT & DENSITY: 5 to 9 stories,** ½-mile around BART, Caltrain, Muni Metro, and Major Bus Stops
- **VARIOUS EXEMPTIONS UNTIL 2032:** For lots with >50% SB79 density, low-resource census tracts, other conditions. ***Most SF parcels are exempt under these rules***.
- **ALLOWS LOCAL "ALTERNATIVE PLAN" IN-LIEU OF SB79:** provided that Alternative Plan has at least same cumulative housing capacity as SB79.



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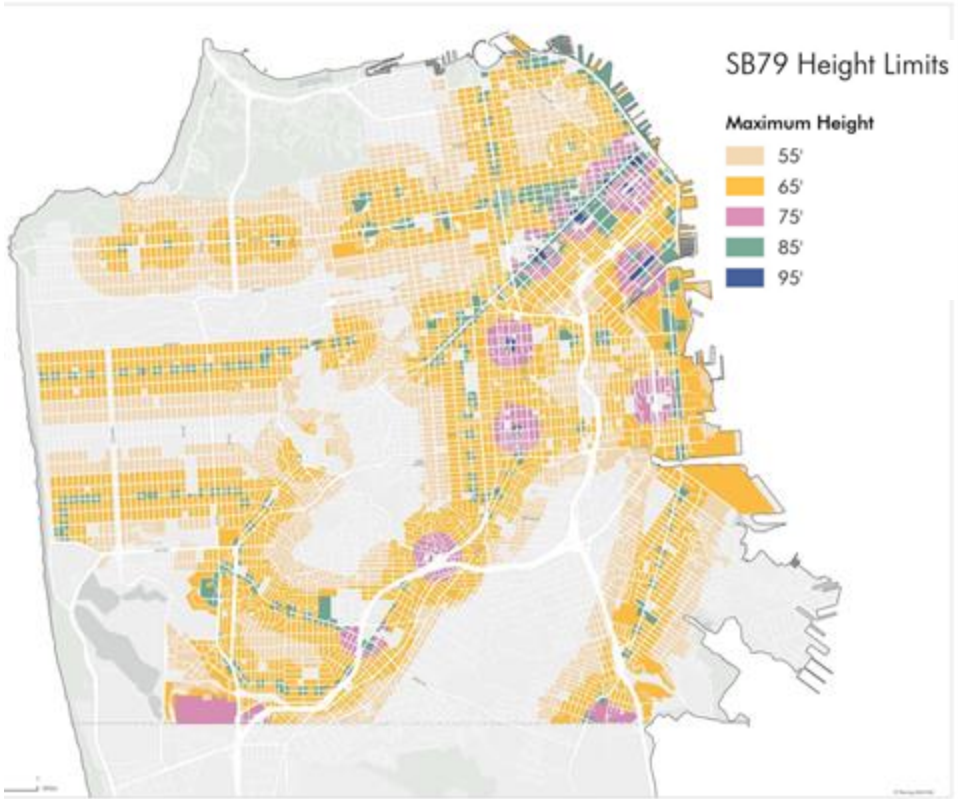
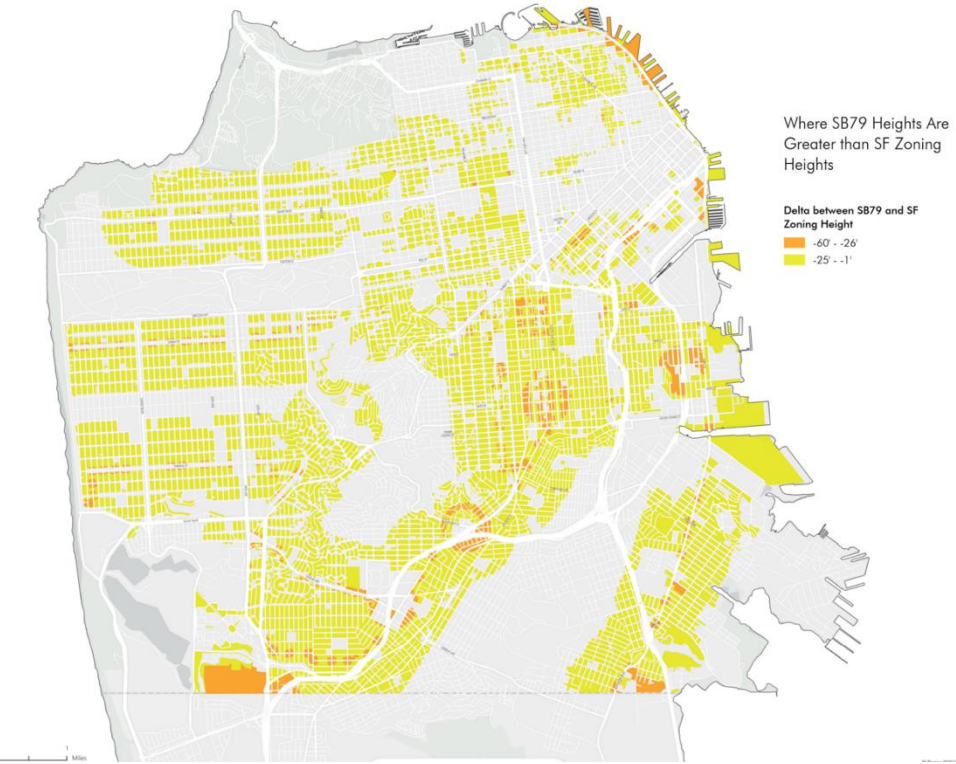
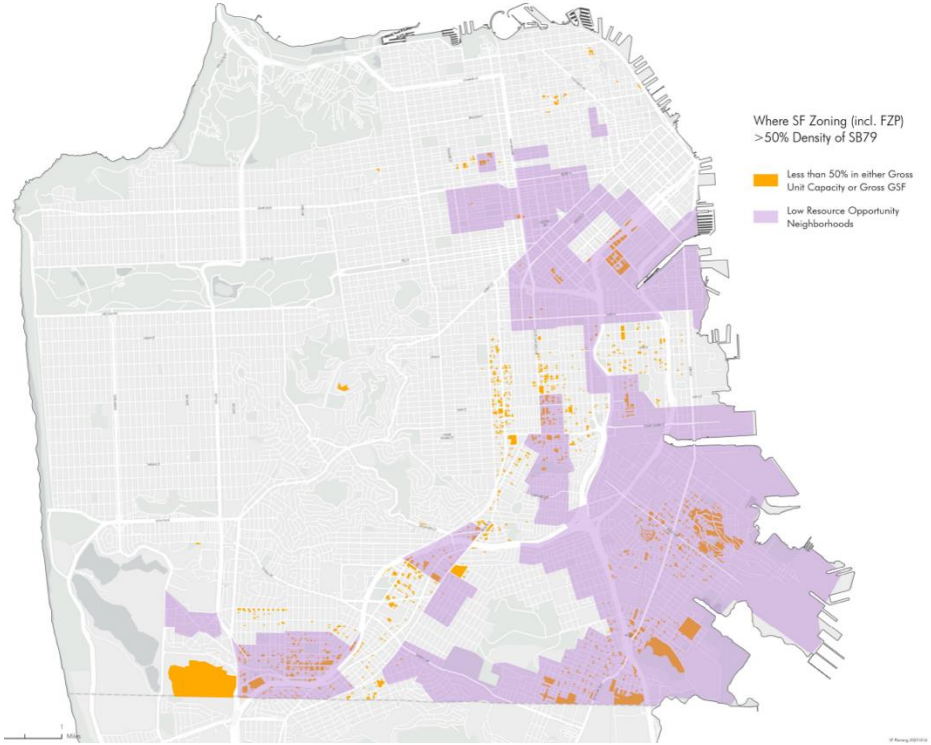


If the Family Zoning Plan is NOT adopted



If the Family Zoning Plan IS adopted

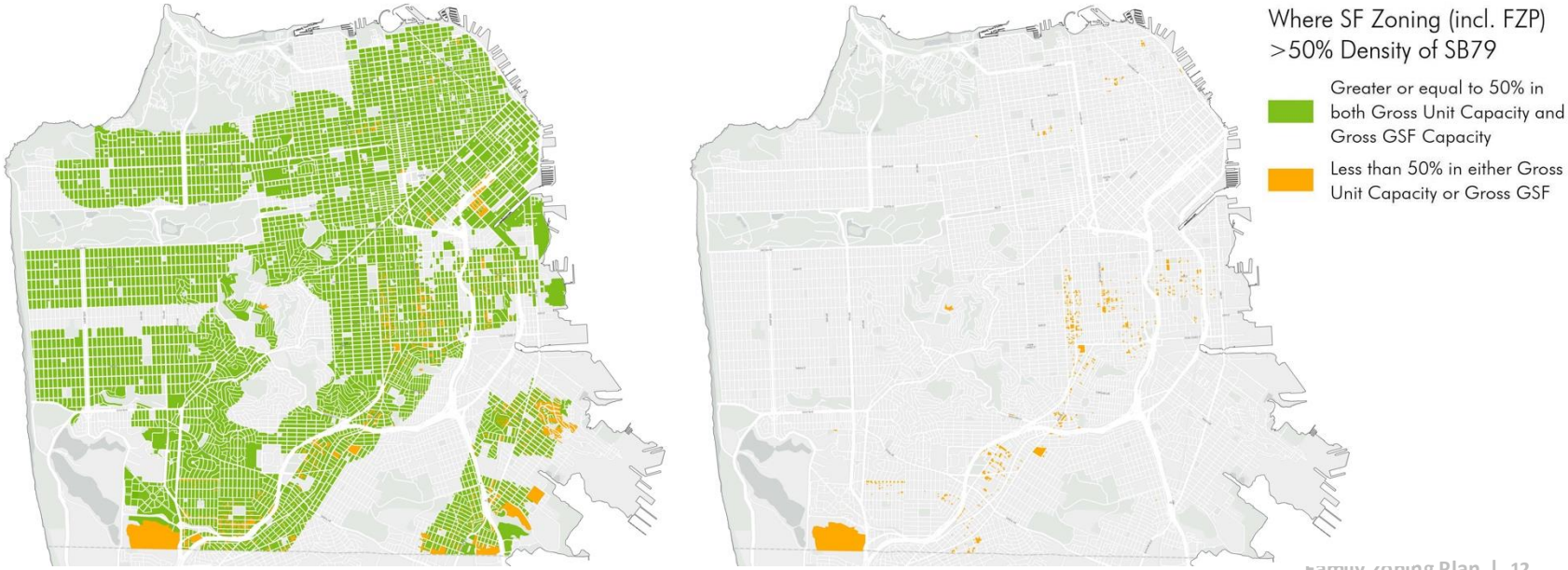


SB 79: Family Zoning Plan is Adequate as "Alternative Plan"

Preliminary analysis shows that **if the proposed rezoning is adopted, SF will likely have an adequate Alternative Plan**, though further analysis is needed.

SB79 Net Capacity: 763,000

SF Zoning Net Capacity in SB79 Area (with FZP): >800,000

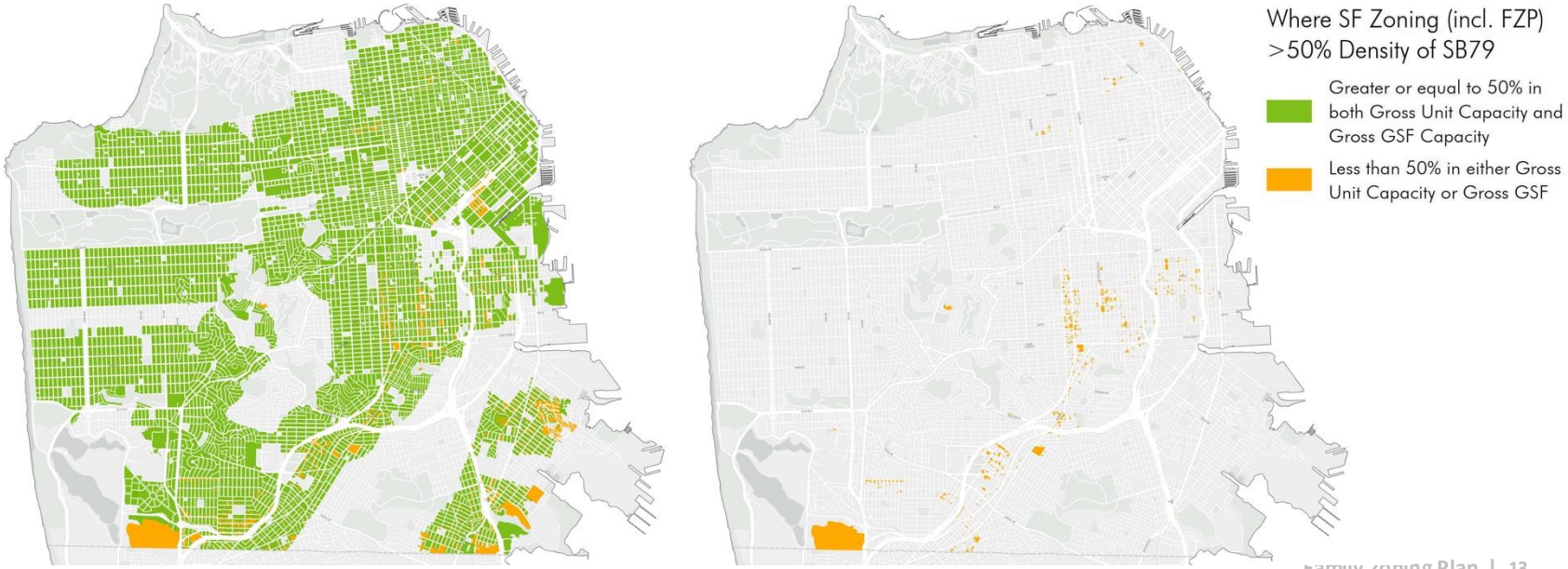


SB 79: Family Zoning Plan is Adequate as "Alternative Plan"

MTC needs to publish final map of stations and station areas

SF is collaborating with other cities on implementation (eg SD, SJ, LA, Sac, Oak)

HCD needs to review and approve Alt Plan ordinance, may take up to 120 days



Summary: Realistic Capacity & SB 79

- **MULTIPLE CAPACITY METHODS NEED TO BE CONSIDERED** and all must meet our requirement for **realistic capacity for 36,200 units** (16,000 units moderate & above-moderate).

- **AMENDMENTS NEED TO BE "NET NEUTRAL":** Per HCD preliminary approval letter in September, **changes that negatively affect housing capacity and/or constraints should be offset with changes elsewhere.**

Summary: Realistic Capacity & SB 79

- **SIGNIFICANT STEP TOWARD SB 79 ALTERNATIVE PLAN:** If the Family Zoning Plan is adopted, **it will satisfy the primary criteria for the "Alternative Plan" under SB 79, which would allow us to use local height limits.**
  - A small number of parcels outside of the Family Zoning Plan will need **minor adjustments to increase density** before July 2026 to meet the Alternative Plan criteria.
  - We will have the opportunity to **recertify our Alternative Plan in 2032** so that local zoning controls will continue to apply, instead of SB 79.

Possible amendment: Commercial Replacement Incentive

- **Commercial Replacement Incentive** was adopted into the original file on 10/20/25 and provides a square footage bonus in the Local Program for projects that:
  - **Replace existing commercial uses** with a space of equivalent size and street-facing dimensions.
  - **Preserve a historic storefront**, which are granted an additional bonus.

- Supervisor Sauter is working with City Attorney and Planning Department **on a non-substantive amendment to refine the proposal and make it easier to use.**
  - Would allow projects to **replace an existing space(s) with multiple spaces** so long as the cumulative commercial square footage on the site and the street-facing dimensions are preserved.
  - Will clarify requirements for replacing existing spaces with a “warm shell” for food service use.

Thank you!

http://sfplanning.org/sf-family-zoning-plan

sf.housing.choice@sfgov.org

San Francisco Family Zoning Program

HOUSING ELEMENT REZONING

San Francisco Planning

Lisa Chen
Principal Planner, Plan Manager

James Pappas
Principal Planner

LAND USE & TRANSPORTATION COMMITTEE

OCTOBER 20, 2025

TODAY'S PRESENTATION

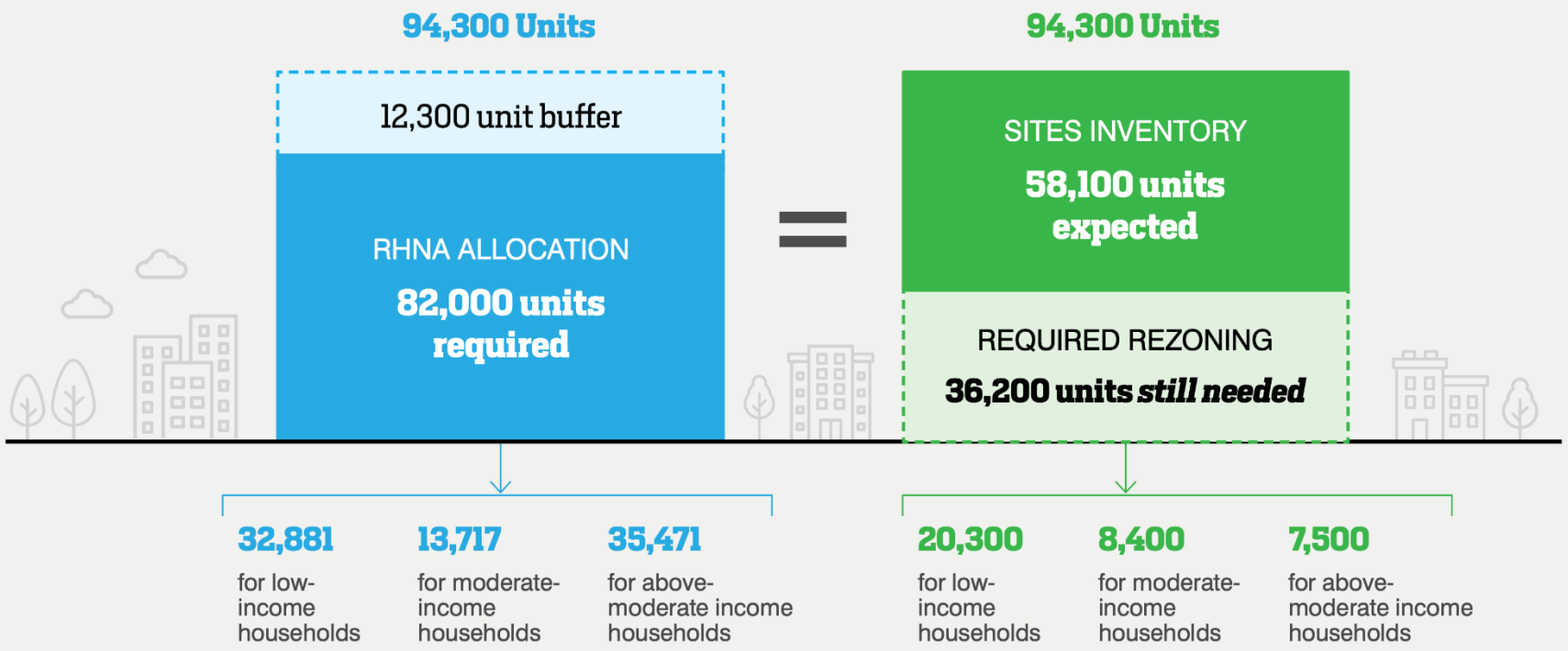
- Background
- Legislation under Consideration
- Affordable Housing Sites Analysis & Strategy
- Informational Resources & Visuals

Image from Wikipedia

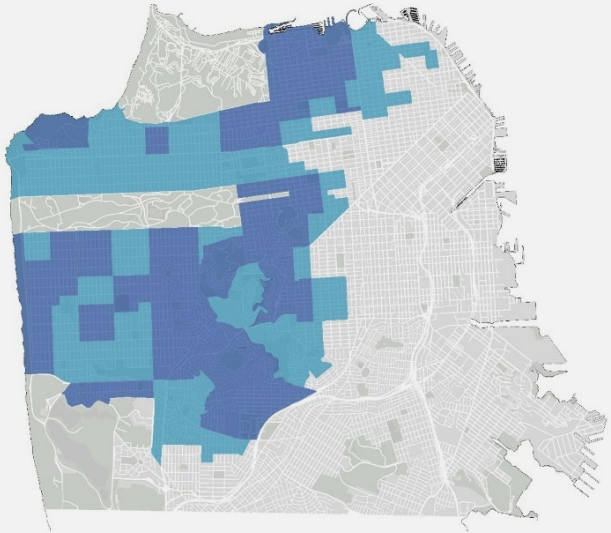
San Francisco's Pervasive Housing Crisis

- SF is 2nd most expensive rental market and 2025 rents grew fastest of any US city.
- Rental vacancies are down to 3.8% — on par with pre-pandemic levels.
- It takes more than 4 minimum wage jobs to afford average SF rent.
- In 2024, 81,200 people applied in the lottery for 512 affordable housing units.
- Evictions nearly doubled in 2024 and are at their highest rate since 2018.
- 1/3 of households are cost-burdened, both renters and owners.
- SF has more than 8,300 unsheltered individuals.

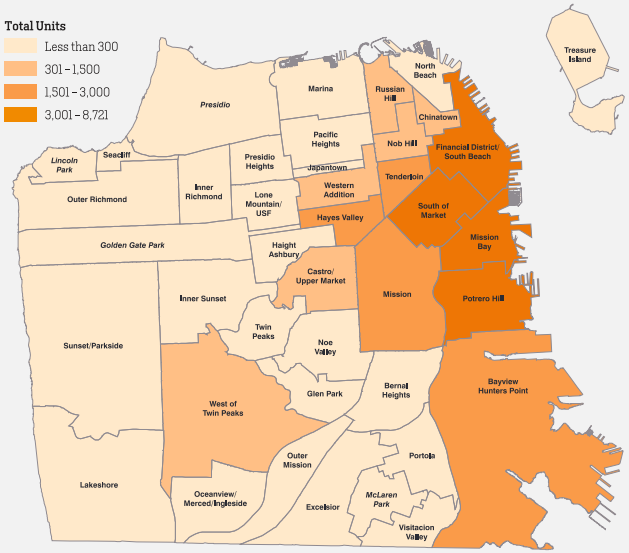
California needs 2.5 million housing units. San Francisco's fair share is 82,000 units.



The Family Zoning Plan fulfills state laws by planning for affordable and mixed-income housing to overcome historic patterns of exclusion.



Housing Opportunity Areas*



Housing Production (2005-2019)

90% of housing was built outside** "housing opportunity areas," even though they cover over **50% of the city.

*Areas designated "Highest Resource" and "High Resource" on the Opportunity Area Map (CA Dept of Housing & Community Development)

What's at stake if we don't rezone

BUILDERS REMEDY: Menlo Park 446' proposal; zoned for 70'

If San Francisco does not adopt compliant rezoning, we risk:

- **State seizure of local permitting power,** a.k.a. "builders remedy"
- **Loss of state funding,** including transportation & affordable housing
- **Fines and lawsuits**

Source: Menlo Park

Communities facing Builders Remedy

See factsheet:
What happens if we don't rezone?

PALO ALTO

MENLO PARK

MOUNTAIN VIEW

BEVERLY HILLS

SANTA MONICA

SANTA CRUZ COUNTY

REDONDO BEACH

LOS GATOS

The Kelsey: $30million AHSC award

SF received $110 million/year in funds requiring Housing Element compliance:

- CalTrans Sustainable Communities Grant
- One Bay Area Grant
- Affordable Housing and Sustainable Communities
- Permanent Local Housing Allocation
- Community Development Block Grant Program
- Infill Infrastructure Grant Program
- Local Housing Trust Fund Program
- HOME Program
- Local Partnership Program
- Transit and Intercity Rail Capital Program
- Active Transportation Program
- Solutions for Congested Corridors Program

… and more

San Francisco's obligations under state law

To maintain Housing Element certification, by January 2026 we must:

- Rezone for **realistic capacity** to meet our RHNA shortfall (36,200 units).
- Affirmatively Further Fair Housing by **zoning in high opportunity areas**.
- **Identify low-income housing sites** that will be eligible for ministerial approval.

NOTE:

Housing Element certification will not be revoked if planned units are not ultimately built.

Community Engagement 2023-2025

18 Public Hearings

70 Education Workshops
1200+ attendees

8 Focus Groups
85 attendees

Survey
2,382 respondents

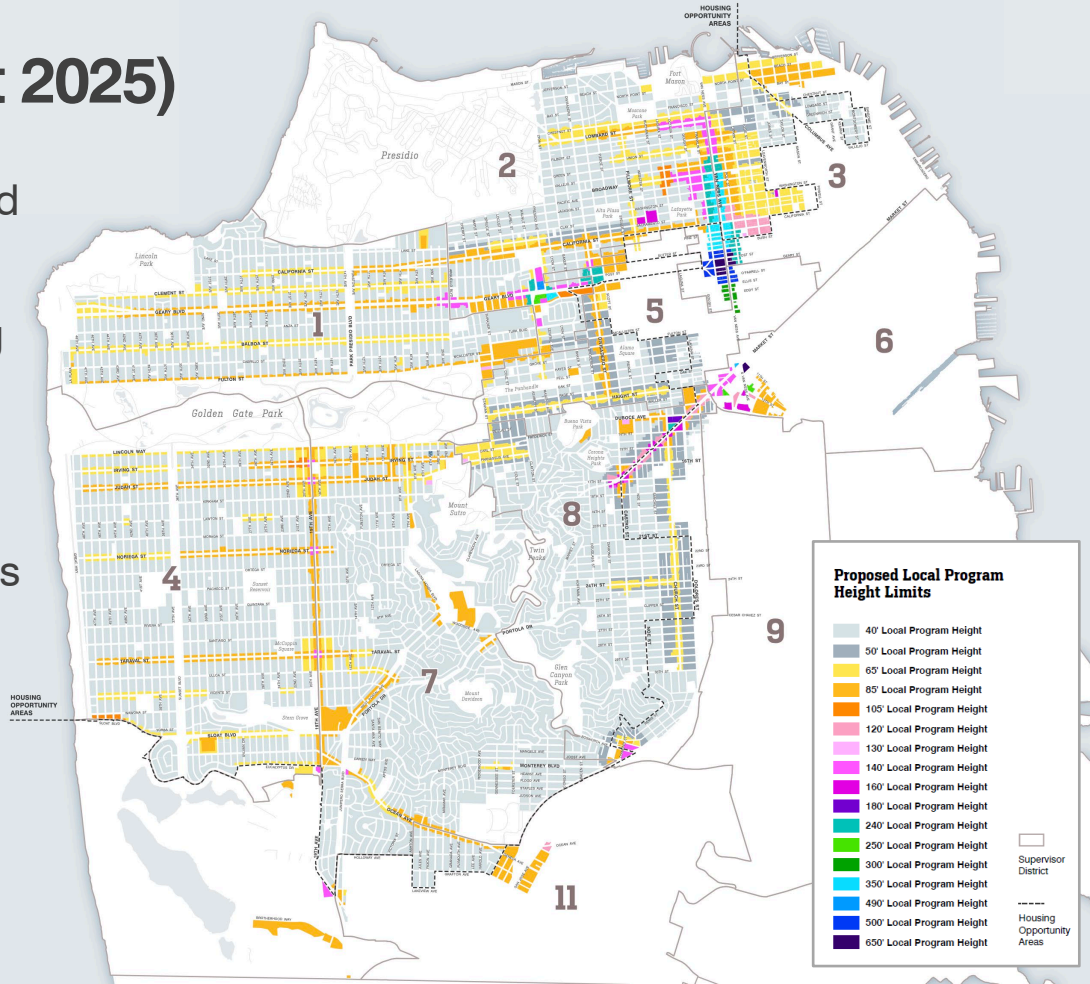
90+ Community Conversations
2000+ attendees

4 Open Houses, 2 Housing Summits
800+ attendees

Photos: SF Planning, Wah Mei School

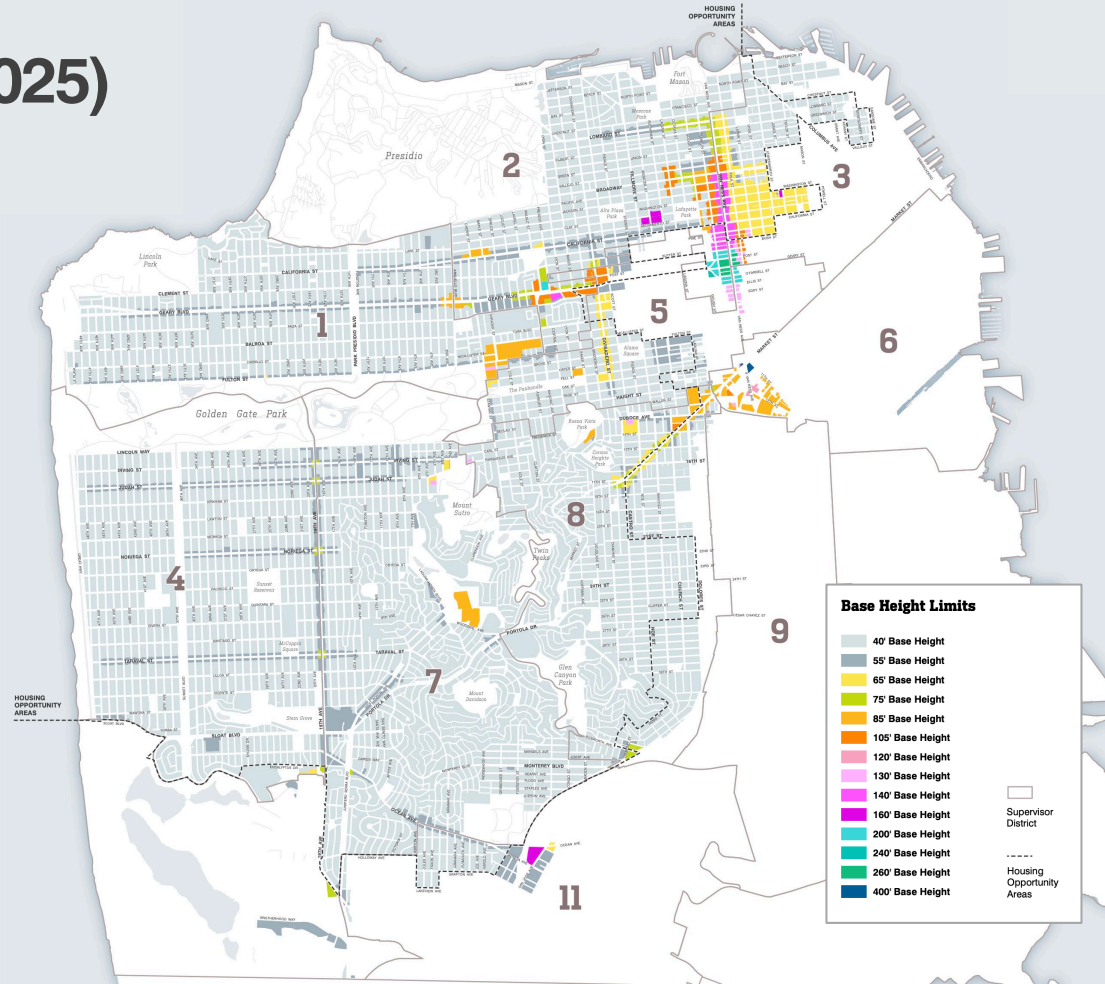
Proposed
Local Program Map (Sept 2025)

- **MEETS STATE REQUIREMENTS** and allows for at least 36,200 new homes.
- **KEEPS LOCAL CONTROL** by setting base heights lower and incentivizing projects to use a Local Program.
- **PUTS TALLER BUILDINGS NEAR TRANSIT AND SERVICES:** 6+ stories on main streets and near transit.
- **ALLOWS SMALL APARTMENTS ELSEWHERE:** keeps existing 40’ height (4 stories) while welcoming more homes.



Proposed
Base Height Map (Sept 2025)

- **ON CORRIDORS, PROJECTS CHOOSE LOCAL OR STATE PROGRAMS:** Projects can get to similar heights under either option.
- **IN RESIDENTIAL AREAS, PROJECTS MUST USE LOCAL PROGRAM.** Projects in program get form-based zoning and **may not use State Density bonus.**

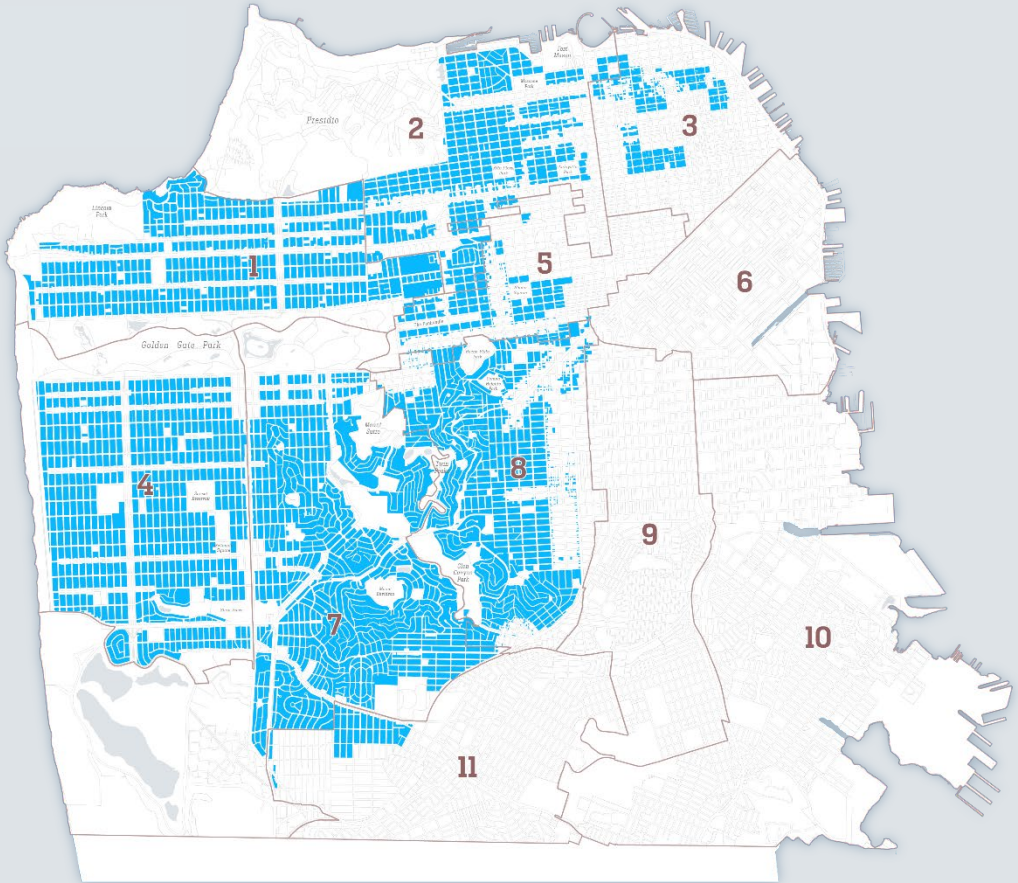


40’ Gentle Density (4 stories)

77% of sites in the rezoning receive no height changes but will get to build more units within their 40’ height limit.

These projects **cannot use State Density Bonus** to increase heights further.

2-unit (left) and a 4-unit building (right) on Hermann Street.

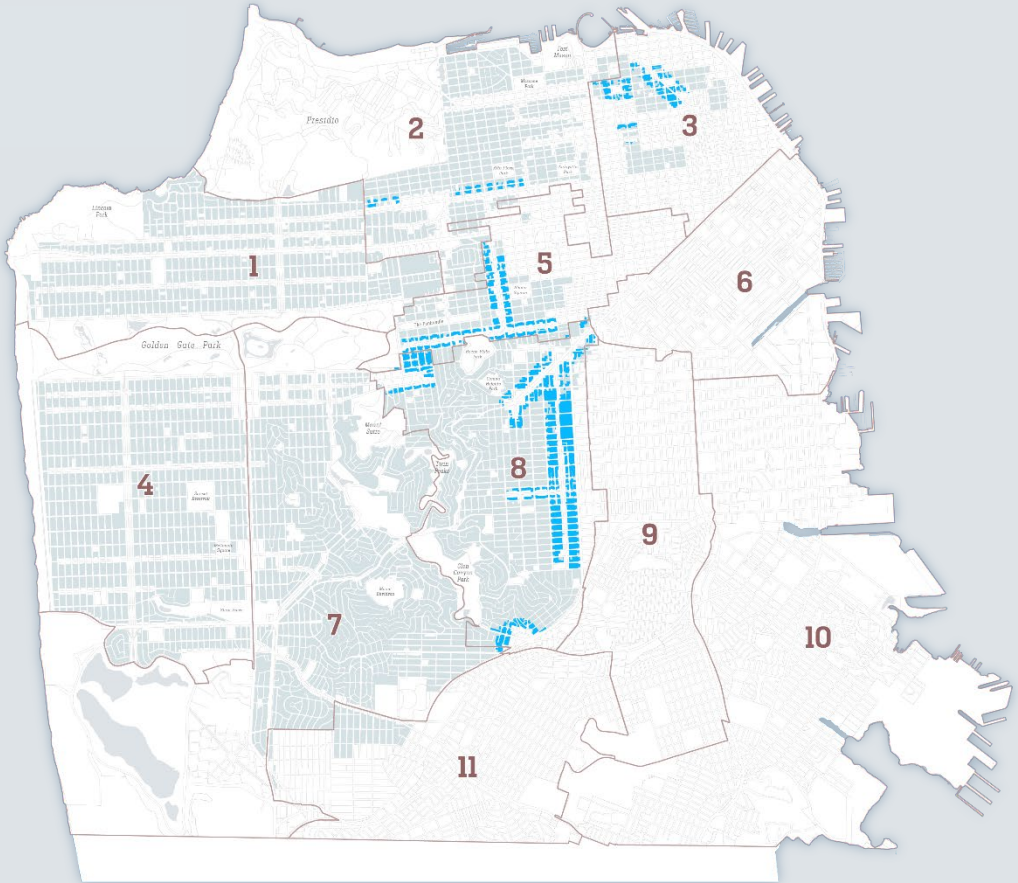


50’ Commercial Transition (5 stories)

Commercial transition areas get an additional **1 story (10’)** through the Local Program.

These projects **cannot use State Density Bonus** to increase heights further.

5-story building on West Portal Avenue

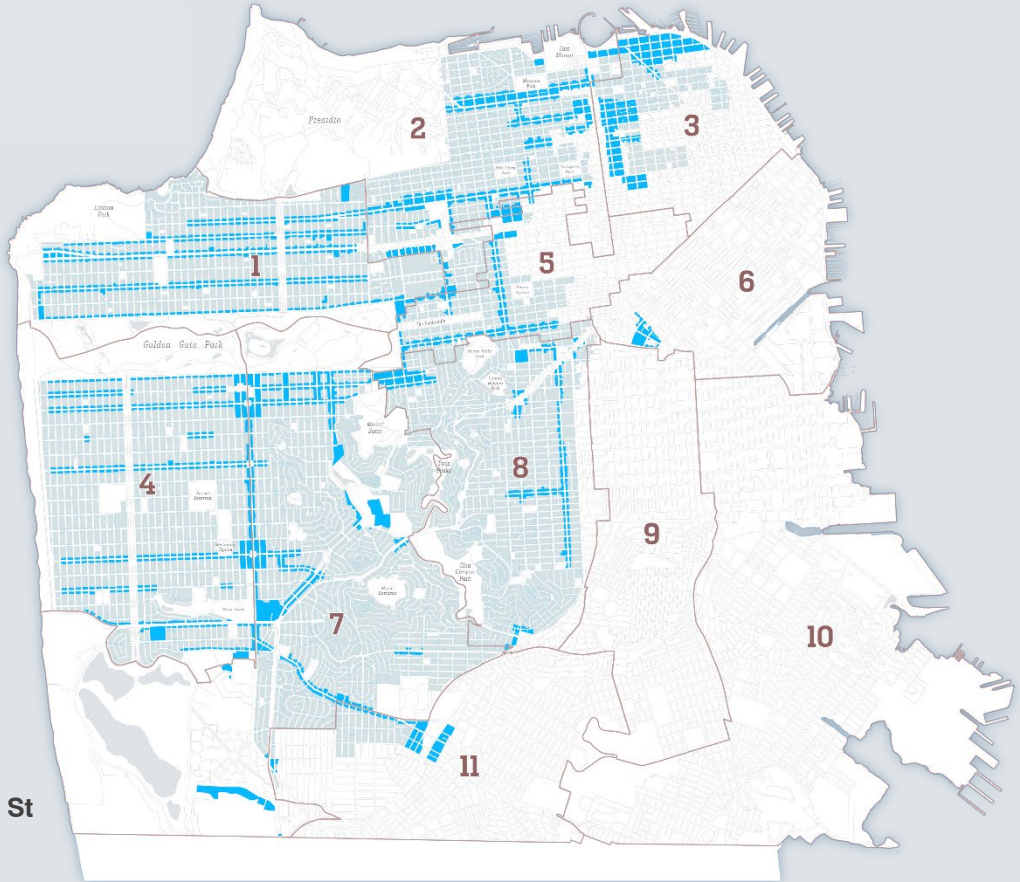


65’ & 85’ Mid-Rise Corridors (6 and 8 stories)

Generally 2 to 4 stories above today’s height limit.

Projects can choose either Local Program or State Density Bonus to get to similar heights.

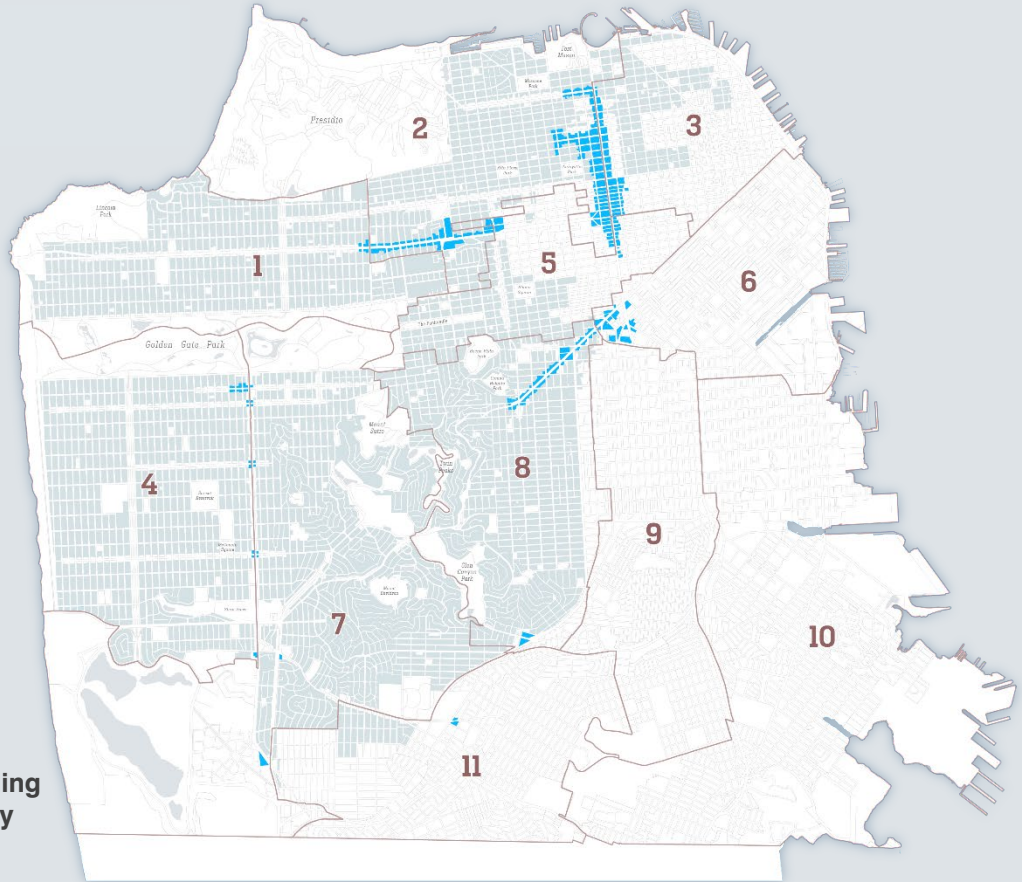
6- and 8-story building on Polk St



Select High Rise Area (Height varies)

Projects can choose either Local Program or State Density Bonus to get to similar heights.

16-story building in Mission Bay



State Law & Capacity Calculations

To meet state law and Housing Element Action 7.1.1: SF must demonstrate that rezoning adds at least 36,200 units of capacity on **sites that are suitable and available**, using **methods that reasonably account for development likelihood.**

HCD issued a preliminary approval of the Plan on September 9th, noting that SF must use **all three of these methods** in combination to demonstrate realistic capacity:

Method	Analysis	Capacity *(June & Sept ordinances)*
Citywide	Uses an annual pace of development relative to zoned capacity.	**39,000 units** *(meets target of 36,200 units)*
Soft Sites	Excludes or discounts parcels based on current uses and other characteristics.	**45,000 units** *(meets target of 36,200 units)*
Feasibility	Computational model testing financial feasibility and economic conditions on each parcel.	**19,000 units** *(meets target of 16,000 moderate & above-moderate units)*

Senate Bill 79 (SB 79): Applies after July 1, 2026

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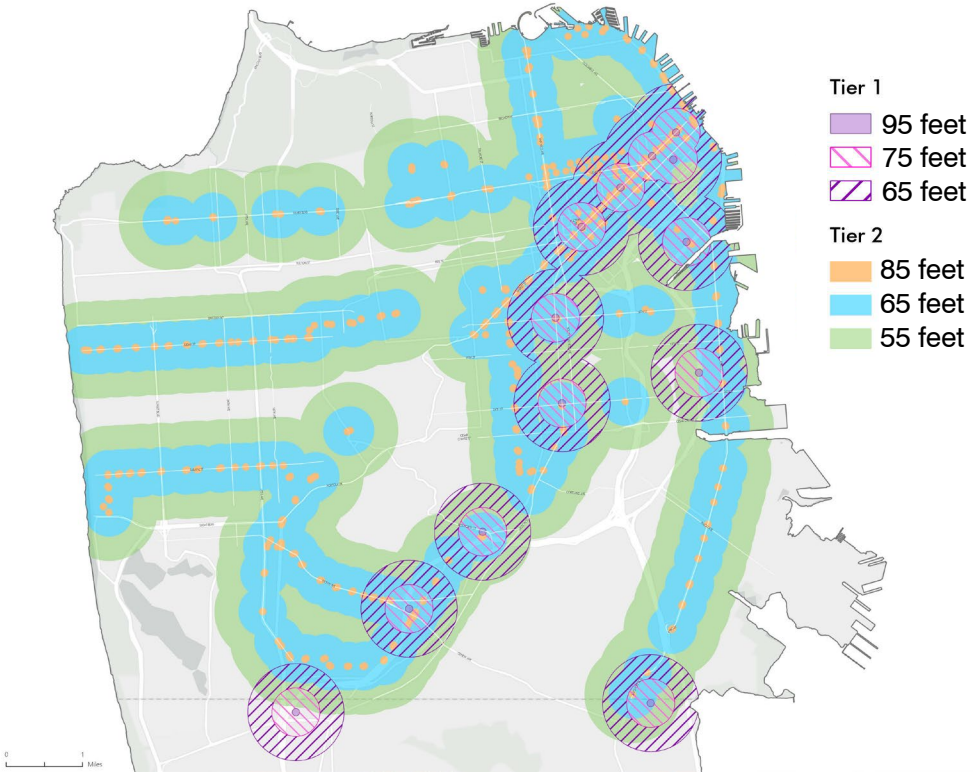
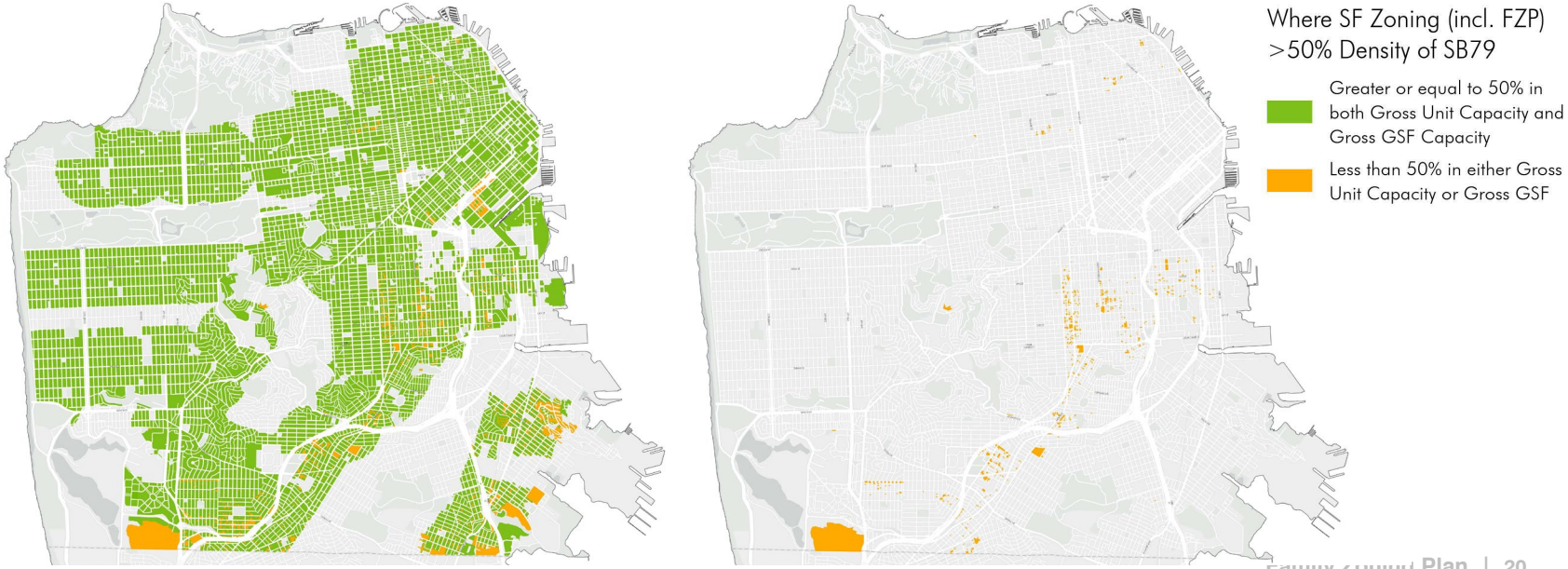


SB 79: Family Zoning Plan is Adequate as "Alternative Plan"

Preliminary analysis shows that **if the proposed rezoning is adopted, SF will likely have an adequate Alternative Plan**, though further analysis is needed.

HCD and MTC will issue additional guidance on SB79 implementation.



ENVIRONMENTAL REVIEW

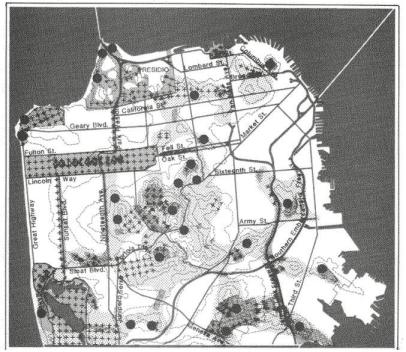
ACTIONS UNDER CONSIDERATION

1. Adoption of General Plan Amendments Ordinance (File 250966)
2. Adoption of Map Ordinance (File 250700)
3. Adoption of Planning, Business, & Tax Regulations Code Ordinance (File 250701)
4. Adoption of Local Costal Plan Amendment Resolution (File 250985)

General Plan Amendments Ordinance (File 250966)

- **Goal:** Modernize the General Plan and bring it into **alignment with the Family Zoning Plan**.

- **Proposed Amendments:**
  - Remove **outdated height maps**
  - **Update language** about height limits, density limits, and building scale and character.



Urban Design Element
Commerce and Industry Element
Transportation Element
Balboa Park Station Area Plan
Glen Park Community Plan
Market and Octavia Area Plan
Northeastern Waterfront Plan
Van Ness Avenue Area Plan
Western SoMa (South of Market) Area Plan
Western Shoreline Area Plan.
Land Use Index

PROPOSED AREA PLAN AND ELEMENT UPDATES

Source: Glen Park Community Plan, Urban Design Element

Zoning Map Ordinance (File 250700)

- **ZONING DISTRICT CHANGES:** Reclassifies various parcels to other districts to **allow more housing**, including Mixed Use, NC, and new RTO-C zoning.
- **HEIGHT CHANGES:** Changes **height limits** on certain parcels,and sets a “Base” height and “Local Program” height.
- **NEW BULK DISTRICT:** Creates new **R-4 Height and Bulk District**, which establishes eligibility for optional Local Program (“Housing Choice SF Program”)
- **SFMTA SPECIAL USE DISTRICT (SUD):** Adds various properties to a SFMTA SUD to enable housing production. **Future development projects will need Board approval.**
- **LOCAL COASTAL PLAN:** Amends parcels in Local Coastal Plan to be **consistent with the changes above**.

Planning, Business & Tax Regulation Code Ordinance (File 250701)

Topic	Amendment	Sections
Local Program (Housing Choice SF Program)	**Offers Incentives and streamlined process** via Local Program (Housing Choice SF Program), a flexible alternative to the State Density Bonus that **ensures local control over height and design standards**	206.10; 344
New Residential Zoning District (RTO-C)	Sets rules for newly created Residential Transit Oriented – Commercial (RTO-C) district, a **form-based district which allows ground floor commercial**	209.4
SFMTA Special Use District	Sets rules for SFMTA Special Use District to **allow for future housing on sites** (future developments projects will still require Board approval)	249.11

Planning, Business & Tax Regulation Code Ordinance (File 250701)

Topic	Amendment	Sections
Senior Housing Flexibility	Makes it **easier to build senior housing** by adjusting open space, bike parking, and minimum unit requirements.	135 155.1 202.1(f)(1)(C)
Small Business Relocation & Early Notification	• Supports **relocation of displaced businesses** by exempting Conditional Use hearings and impact fees; • Requires **early notification** to the commercial tenant and Office of Small Business.	202.17; 311
Efficient Land Use Near Transit; Parking Management	• Establishes **minimum densities** for residential and office uses near transit. • Adjusts **maximum parking ratios** according to proximity to transit.	Various

Planning, Business & Tax Regulation Code Ordinance (File 250701)

Topic	Amendment	Sections
Housing Sustainability District (HSD)	Creates a Housing Sustainability District (HSD), **another ministerial pathway** for qualifying projects in the Local Program.	344
Height and bulk limits	Modifies height and bulk standards to be **consistent with Citywide Design Standards**.	260
Wind Review Standards	**Consolidates wind review standards** for projects 85' and above in some districts	148
Code Cleanup & Local Coastal Plan Consistency	• Conforming edits to **zoning control tables** • Referral of amendments in **Local Coastal Plan** to Coastal Commission • Clarifying edits to conform with **state law** and other **code cleanup**	Various

Local Program (206.10): Menu of Code Flexibility

Automatic Flexibility in Local Program

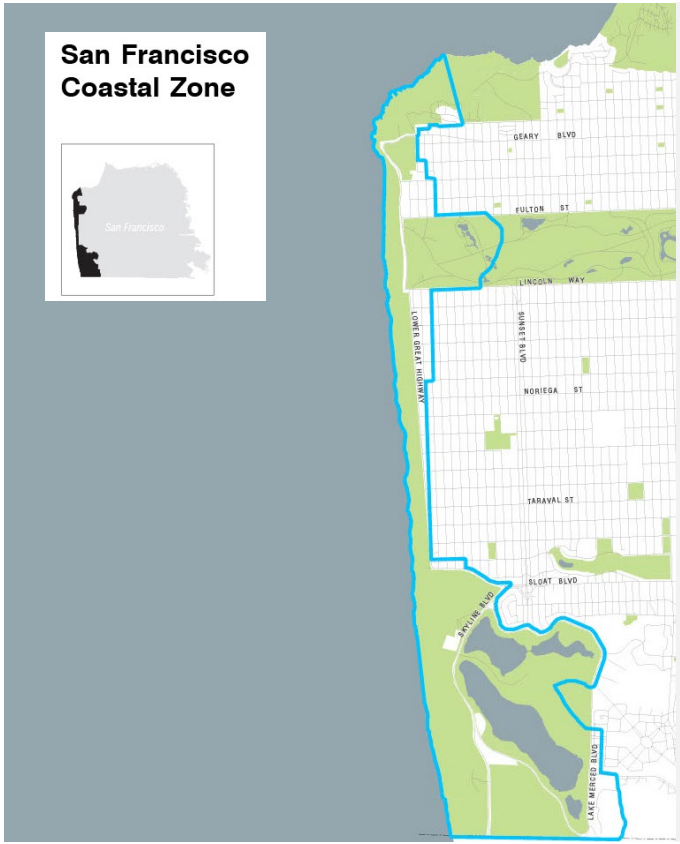
- **Density:** form-based density (if not already in base zoning)
- **Inclusionary Housing:** flexibility to use all affordable options; rent-control option for <25 units.
- **100% Affordable Projects** receive 2 extra stories (20') and other flexibility.
- **Waive Exposure and Usable Open Space** requirements
- **Waive Large Lot and Non-residential Use Size** Conditional Use hearing.
- **Rear Yard** reduction to the greater of 18% or 15'.
- **Ground Floor Height** waiver for projects in 85' height districts
- **"Catchall" Flexibility:** 15% additional relief on other topics.

Local Program (206.10): Development Bonuses

Projects can receive a **square footage bonus**, added via height or horizontal bonuses:

Height bonuses (Corridors Only)	Horizontal bonuses (Location varies)
Cumulative 2 stories (20') bonus for historic preservation: for adaptive reuse **Cumulative 1 story (10') bonus for various incentives:** • **Commercial:** Warm Shell, Micro-Retail, Legacy Business or displaced business • **Community-serving use:** nonprofits, grocery, community facilities, childcare • **Family-sized units:** 3+ bedrooms	• **Historic preservation (corridors only):** may reduce rear yard • **Family-sized unit incentives:** may reduce rear yard, side yard, and upper-story setbacks • **Family-friendly amenities (residential districts only):** may reduce rear yard, side yard, and upper-story setbacks

Local Costal Plan Amendment Resolution (File 250985)



- **CONSISTENCY WITH COASTAL ACT:** Certifies Local Coastal Plan (LCP) Amendment is **consistent with Coastal Act**
- **REFERRAL TO COASTAL COMMISSION:** Directs Planning Director to submit LCP Amendment to **CA Coastal Commission for public hearing and certification.**

Affordable Housing **Sites Analysis and Strategies**

Topics We'll Cover Today

- Project **Purpose and Context**
- Research and Analysis:
  - **Pipeline and Parcel Analysis**
  - **Policy and Financial Research**
- Recommended **Strategies**

Affordable Housing Sites Analysis & Strategies Purpose

Affordable Housing Sites Analysis and Strategies (AHSAS) informs how the City and affordable housing developers can **acquire and develop sites for 100% affordable housing,** focused on:

- **Effectively managing the existing pipeline** of affordable housing
- **Ensuring ongoing affordable housing production** along with equitable geographic distribution of affordable housing
- **Identifying and acquiring new sites for affordable housing development** using a range of approaches

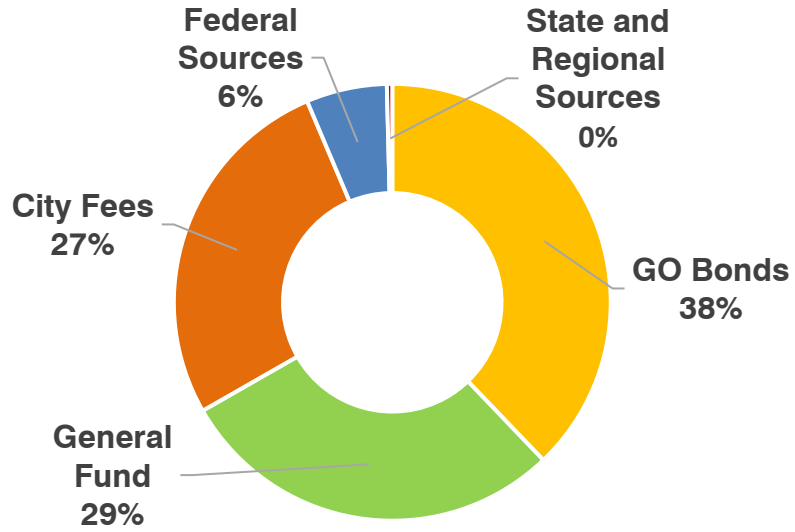
Affordable Housing Funding as the Key Challenge

Funding and cost lowering are key to produce and preserve affordable housing.

Affordable Housing Leadership Council Report (Spring 2024) addresses **funding, financing,** and **costs**.

- **Increase Federal, State, and regional funding**.
- **Expand San Francisco's capacity and coordination to fund** affordable housing.
- **Innovation and alternative approaches** to delivering affordable housing.

Local Affordable Housing Funding 2018-2023



Property taxes and other revenue from new development provide majority of local funding

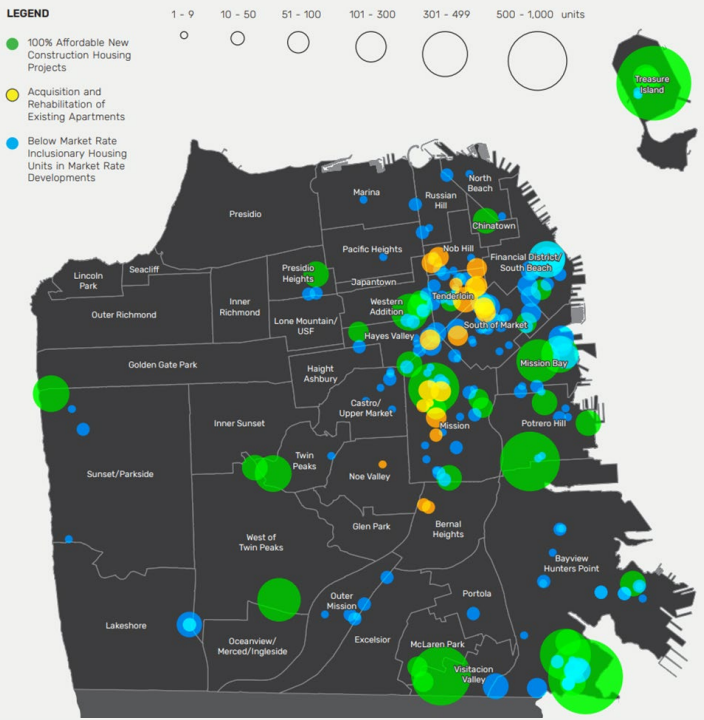
Affordable Housing Pipeline Analysis

Mapping and Analysis of Existing Affordable Housing Pipeline

- **Prospective sites & Pre-construction:** 12,600+ units (59 projects)
- **Under Construction:** 2,299 units (30 projects)
- **Inclusionary BMR Units:** 2,500+ units (124 projects)

Geography: Affordable Housing pipeline **mirrors the market-rate pipeline,** with most projects in equity geographies.

Significant funding gap holds back the completion of existing pipeline



Source: MOHCD July 2025

Site Suitability Analysis (pre-rezoning)

Purpose: Identify potential affordable housing sites based on:

- **Policy** (local/state law) and development potential
- **MOHCD and affordable developer criteria**: preference for 100+ units on 8,000+ sq ft for efficiency
- **Analysis excludes existing residential units** and various public sites

Draft Finding: Under today's rules (pre-rezoning), 1,200 parcels may be suitable for affordable housing with capacity for 148,000 units.

Assembling smaller adjacent lots yields additional 2,200 parcels with capacity for 98,000 units.

100% Affordable Sites: Relationship to Rezoning

FAMILY ZONING PLAN

REZONED SITES (overall)

- Required to meet Housing Element (e.g., **RHNA**) at all income levels.
- **Primarily located in Well-Resourced Neighborhoods**.

LOW-INCOME SITES

- Subset of rezoned sites to meet **low-income** RHNA requirement.
- Must meet **minimum size and density**.
- Future projects proposing >20% BMR are eligible for **ministerial approval**

100% AFFORDABLE SITES

- Sites meeting **suitability criteria** for MOHCD, state, and federal funding.
- **Located citywide**; overlaps with rezoning & low-income sites
- **Rezoning will enable additional parcels** to meet criteria.

Affordable Housing Financial and Policy Research

Financial Research: Trends in land and development costs

- **Construction costs are 60%+ of affordable housing development costs while land costs averaged about 10%** (ranging from 7-14%). Land holding can add cost as well
- **Land prices have been relatively stable averaging ~$121K per unit over the last decade**. Fewer land sales in down markets; prices fluctuating just 5%.
- **Rezoning has limited effect on land costs per unit**; effects are linked to economic conditions and financial feasibility. Recent land prices per unit for affordable housing sites were comparable in rezoned areas and areas with no zoning changes

Policy research: Best practices from other cities

- **Establishing stable funding and aligning pipeline growth with funding capacity** and building on **partnerships with public, nonprofit, & faith-based property owners**

Affordable Housing Sites Recommended Strategies

1. **Managing the pipeline** of housing development and site acquisition
2. **Expanding the geography** of affordable housing
3. **Public sites and faith- and nonprofit-owned sites** for affordable housing
4. **Strategic market practices** for site acquisition
5. **Expanding opportunities for "missing middle"** affordable housing types.

Updated Informational Resources

Resources providing factual information and addressing misinformation:

- What is the Family Zoning Plan?
- (NEW) Capacity Calculations
- Small Business
- Tenant Protections
- What Happens if We Don't Rezone?
- Example visualizations

Residential demolitions are extraordinarily rare and will remain so after rezoning.

235

Units demolished (2012 - 24)

18 units/year
(0.00004% of SF housing stock)

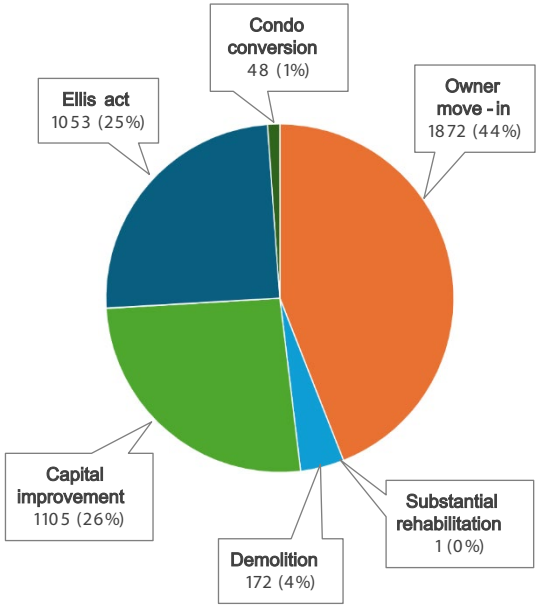
139 single family (11 units/yr)
(352 units built; 213 net new)

96 multifamily (7 units/yr)
(284 units built; 188 net new)

4%

of no - fault evictions are due to demolition (2015 - 2025)

96% of evictions are due to **owner move - in (44%), capital improvement (26%), and Ellis Act (24%)**



Source: Planning Department, Rent Board. Demolition data does not include HOPE SF, development agreements, or emergency demolitions.

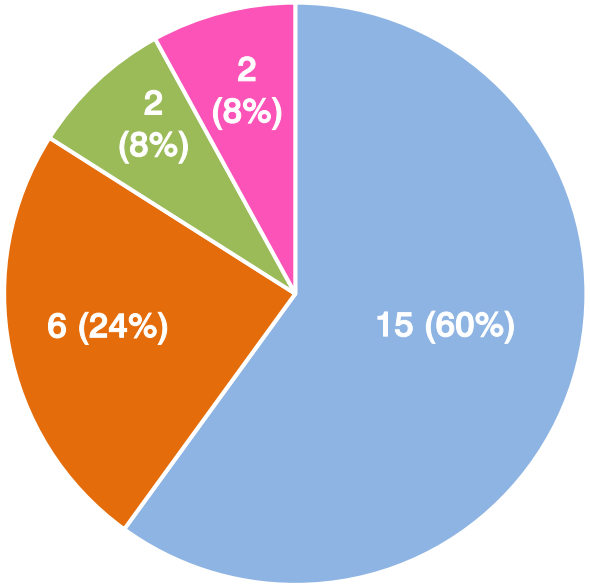
Most housing developments are built on vacant and underutilized lots.

Case study: Market Street & Ocean Ave

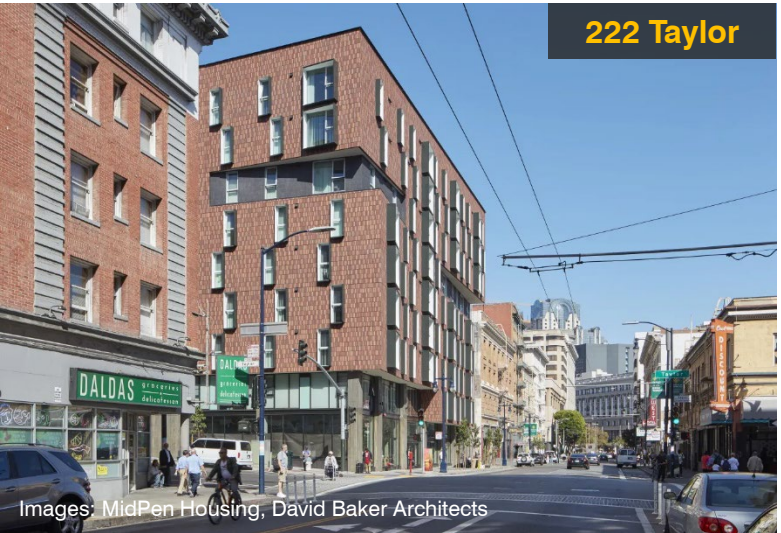
2,800 new homes built since 2007

84% of new housing projects were on sites without storefront businesses

92% did not result in major impacts to historic resources



Source: SF Planning Land Use Database (2025)



Images: MidPen Housing, David Baker Architects

Rezoning will increase housing affordability & diversity.

- **100% AFFORDABLE HOUSING:** funded by **bonds, inclusionary fees, state & federal funds**.
- **MIXED-INCOME HOUSING:** Market-rate projects contribute at least **15-20% affordable** units.
- **SITES FOR AFFORDABLE:** Enabling **sufficient sites** for affordable housing
- **INCENTIVES FOR 100% AFFORDABLE:** through our **Local Program**.
- **DIVERSITY = AFFORDABILITY: Allowing more housing will increase affordability**, esp. for middle-income households.

What will change look like?

- **Spending at local businesses** ($5.6 billion over 8yr)
- **Housing diversity and affordability**
- **More housing choices & stability for employees**
- **Revenues for public services & infrastructure**
- **Climate & environmental benefits**

Images: David Baker Architects, Handel Architecture, HKS

Visualization: Geary Blvd at 3rd Ave

Credit: AECOM

Visualization: Noriega St @ 25th Ave

Credit: AECOM

Visualization: Lombard St @ Buchanan St

Credit: AECOM

Visualization: Lombard St at Richardson St

Credit: AECOM

Visualization: Ocean Ave and Lee Ave

Credit: AECOM

Visualization: Divisadero St and Bush St

Visualization: Residential District (composite; not an actual location)
40'
Credit: AECOM

Visualization: Lyon St Steps view

Credit: AECOM

Visualization: Francisco Park view
45
65
45
Credit: AECOM

Visualization: Francisco Park view

Credit: AECOM

Visualization: Coit Tower view
65'
65'
65'
85'
85'
65'
65'
85'
Credit: AECOM

Acknowledgements

Sarah Dennis-Phillips, Planning Director
Rich Hillis, former Planning Director
Rachael Tanner, Citywide Planning Director
AnMarie Rodgers, former Citywide Planning Director
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Jenine Marquez (CAT)

Special thanks: Office of Small Business, MOHCD, SFMTA, Century Urban, AECOM, Groundworks Consulting, ICF, RWDI, PreVision, CivicEdge

Art by ChatGPT with modifications by SF Planning

Thank you!

http://sfplanning.org/sf-family-zoning-plan

sf.housing.choice@sfgov.org

San Francisco Planning

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NOTICE OF ELECTRONIC TRANSMITTAL

DATE:	November 17, 2025
TO:	Angela Calvillo, Clerk of the Board of Supervisors
FROM:	Debra Dwyer, Principal Environmental Planner, 628.652.7576 or Debra.Dwyer@sfgov.org
RE:	Environmental Review for the Family Zoning Program Board Files 250700, 250701, and 250966

In compliance with San Francisco's Administrative Code Section 8.12.5 "Electronic Distribution of Multi-Page Documents," the Planning Department is submitting a memorandum addressing analysis of proposed zoning map amendments to the family zoning program sponsored by Supervisor Sherrill, District 2.

The Land Use and Transportation Committee of the Board of Supervisors will hold a hearing on the Family Zoning Program on November 17, 2025. These environmental documents are associated with Board Files 250700, 250701, and 250966. For questions regarding the environmental review for this project, please contact Ryan Shum, 628.652.7542 or ryan.shum@sfgov.org.

Enclosure

San Francisco Planning

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MEMORANDUM 3

Date: November 17, 2025
To: San Francisco Board of Supervisors
From: Lisa Gibson, Environmental Review Officer – lisa.gibson@sfgov.org , (628) 652-7571
Debra Dwyer, Principal Planner – debra.dwyer@sfgov.org, (628) 652-7576
Ryan Shum, Senior Planner – ryan.shum@sfgov.org, (628) 652-7542

RE: CEQA Analysis for Family Zoning Plan – Proposed Amendments
Planning Case Nos. 2019-016230ENV, 2021-005878CWP, and 2021-005878GPA
Board file nos. 250700, 250701, and 250966

Introduction

The purpose of this memorandum is to document why proposed amendments to the Family Zoning Plan proposed Zoning Map amendments do not require further analysis pursuant to the California Environmental Quality Act (CEQA) beyond the previously prepared environmental impact report, addendum, and supplemental memo.

Following the publication of the Housing Element 2022 Update Final Environmental Impact Report (FEIR) and adoption of the Housing Element, the San Francisco Planning Department (department) undertook an iterative process to develop a proposed rezoning program. The Mayor introduced the Family Zoning Plan (rezoning program) on June 24 and July 28, 2025. The department reviewed the legislation in compliance with CEQA, determined that there would be no new environmental impacts from the legislation, and prepared an addendum to the FEIR to confirm the findings of the FEIR analysis. The department published Addendum No. 1 to the Housing Element 2022 Update FEIR (addendum) on September 3, 2025, pursuant to CEQA.[1] The Planning Commission (commission) heard the rezoning program on September 11, 2025 and recommended its approval with modifications to the Board of Supervisors (board).

After the September 11 hearing at the Planning Commission, the Mayor submitted substitute legislation on September 30, 2025 that included minor changes to the zoning map and the planning code.[2] An October 16, 2025 memorandum to the file provided analysis for the modifications in the substitute legislation (Version 3 – September 30, 2025) pursuant to CEQA Statute section 21166 and CEQA Guidelines section 15162-15164, and incorporated by reference analysis in the FEIR and addendum.

1 San Francisco Planning Department. *Addendum No. 1 to the Environmental Impact Report*. September 3, 2025. Available at: https://sfplanning.org/environmental-review-documents?title=housing+element&field_environmental_review_categ_target_id=All&items_per_page=10

2 San Francisco Planning Department. *Family Zoning Plan: September 30, 2025, Substitute Legislation (version 3).* Available at: https://sfgov.legistar.com/View.ashx?M=F&ID=14834613&GUID=01515652-61EE-41BB-B353-CFB0C61A2C95

On October 20, 2025 the Land Use and Transportation Committee (land use committee) of the Board of Supervisors (board) held a hearing on the family zoning program. Proposed amendments to both the proposed zoning ordinance and zoning map were introduced (See attachment A). The land use committee will hold a second hearing on the family zoning program as well as the proposed amendments on November 3, 2025. This memorandum 2 provides analysis for the proposed amendments to the substitute legislation (Version 3 – September 30, 2025) pursuant to CEQA Statute section 21166 and CEQA Guidelines section 15162-15164, and incorporates by reference analysis in the FEIR, addendum, and supplemental memorandum.

On November 3, 2025 the Land Use and Transportation Committee (land use committee) of the Board of Supervisors (board) held a hearing on the family zoning program. Proposed amendments to both the proposed zoning ordinance and zoning map were introduced (See attachment A to 11/3/2025 memorandum 2).

The land use committee will hold a third hearing on the family zoning program and further proposed map amendments on November 17, 2025. This memorandum 3 provides analysis for the proposed map amendments to the substitute legislation (Version 3 – September 30, 2025) pursuant to CEQA Statute section 21166 and CEQA Guidelines section 15162-15164, and incorporates by reference analysis in the FEIR, addendum, and supplemental memoranda.

Description and Analysis of Proposed Amendments

The full text of the proposed ordinances and map changes are available online at on the board's Legislative Research Center (https://sfbos.org/legislative-research-center-lrc) under board file nos. 250700, 250701, and 250966.

The proposed amendments shown in Table 1 (attached) as well as in Board File 250700. The environmental analysis of proposed map changes with the potential to result in physical environmental effects are discussed below according to the Summary, a description of the general location for the change and whether the amendment is decreasing or increasing heights.

Summary Nos. 1, 2, 3 and 6 would result in decreased heights compared to the heights proposed in the Family Zoning Program as analyzed in the FEIR and addendum. Therefore, these amendments would not increase height or number of units allowed compared to the rezoning program analyzed in the addendum. These decreases are anticipated to result in an estimated decrease of 330 units. No further analysis is required.

Summary No. 4 would result in increased heights along the western portion of Van Ness Avenue between Ellis and Turk streets. In particular, the amendment would increase the base height from 130 feet to 140 feet and an increase in the local program height from 300 feet to 350 feet. The amendment would result in an increase of approximately 250 units within this area of western portion of Van Ness Avenue.

Summary No. 5 would result in increased heights along Pine Street between Leavenworth and Larkin streets. In particular, the amendment would change parcels proposed for 65//120-R-4 to 80//140-R-4. For these parcels the base height would change from 65 feet to 80 feet and the local program would increase from 120 feet to 140 feet. Other parcels would change from 80//120-R-4 to 80//140-R-4 where the base height would not change but the local program height would increase from 120 feet to 140 feet. The amendment would result in an increase of approximately 256 units.

The proposed modifications in item Nos. 4 and 5 may result in an incremental increases in height of between 15 to 50 feet and a marginal increase in the number of units allowed within two areas by about 250 units.

Wind and Shadow. The increases in heights in these two limited areas are within the range of heights studied in the programmatic and representative analysis in the FEIR and addendum. Therefore, these modifications would not result in new or more significant shadow or wind impacts and would be subject to project-level environmental review, as applicable. FEIR shadow and wind mitigation measures to reduce the impacts would apply, as applicable; the planning department would determine whether shadow or wind mitigation measures are required during project-level environmental review, as applicable.

Transportation. The net increase of about 250 units in two areas would result in a marginal increase in housing growth along Van Ness Avenue and closer to the 19-Polk Muni route, but the number of vehicle trips would be similar and would result in similar transportation impacts. The proposed modifications on Van Ness Avenue would not contribute to transit delay as transit operations on Van Ness Avenue are within protected transit only lanes for bus rapid transit. In each area, the increases could add approximately 1,730 daily person trips (289 automobile, 69 TNC/taxi, 485 transit, 50 bike, and 653 walking trips) to the area. Of the 358 automobile trips, only 13 vehicle trips would occur during the PM peak hour. These 13 peak hour vehicle trips would not significantly contribute to transit delay on the 19-Polk. The proposed modifications would not result in a new significant transportation impact that was not previously identified in the FEIR and addendum, nor would it result in substantially more severe impacts than those previously identified. Furthermore, the potential additional units in these two limited areas would be offset by the decreases in areas in item Nos. 1, 2, 3, and 6.

Other Topics. The potential additional units in these two limited areas are offset by the decreases in areas Nos. 1, 2, 3, and 6. The proposed modifications do not consist of peculiar features or unusual circumstances that would distinguish these areas from other areas of the rezoning that have been analyzed. Thus, while the proposed modification would result in a minor increase in housing units in these areas, the impacts of the following topics would be similar as to what is described in the FEIR and addendum: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, paleontological resources, population and housing, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire. No further analysis is required.

Conclusion

The proposed amendments to the family zoning program zoning map could result in minor increases in height, density, and housing unit growth in certain parts of the city, primarily in well-resourced areas. Limited growth could occur in areas adjacent to well-resourced areas, but the Housing Element FEIR and addendum acknowledged that the height and growth distribution depicted in the FEIR was hypothetical and not intended to be a precise depiction of future zoning changes. In addition, the FEIR indicated that future growth would likely be concentrated in, but is not limited to, the well-resourced areas of the city. The incremental growth would not result in new or substantially more severe significant impacts that were not already disclosed in the EIR. The mitigation measures that were identified in the FEIR would continue to apply to future development projects as determined applicable, and the department will determine which mitigation measures would apply during the project-specific environmental review phase. For these reasons, additional environmental review is not required for the proposed amendments to the legislation as described above.

TABLE 1: Proposed Rezoning Map Amendments

No.	Summary	Location	Block/Lot	Proposed Local Program Zoning Designation	Amendment
1	Decreasing heights along one block of Geary Blvd between Wood and Emerson	2700 Geary Blvd	1070003	70//140-R-4	50//85-R-4
		2750 Geary Blvd	1070001A	70//140-R-4	50//85-R-4 from Geary Boulevard to 100 feet from Geary Boulevard; 40//65-R-4 rest of lot
		75 Wood Street	1070002	40//65-R-4	40//65-R-4

No.	Summary	Location	Block/Lot	Proposed Local Program Zoning Designation	Amendment
2	Decreasing heights at the Marina Safeway parcel	15 Marina Blvd	0446002	40//65-R-4	40//40-R-4
		11 Marina Blvd	0446003	40//65-R-4	40//40-R-4
3	Decreasing heights at Ghirardelli Square Block	Ghirardelli Square Block	0452NA	40//65-R-4	40//40-R-4
4	Increasing heights along the western portion of Van Ness Avenue between Ellis and Turk streets	851 Van Ness Ave C1, San Francisco, CA 94109	0738045	130//300-R-4	140//350-R-4
		939 Ellis St, San Francisco, CA 94109	0738019	130//300-R-4	140//350-R-4
		815 Van Ness Ave, San Francisco, CA 94109	0738022	130//300-R-4	140//350-R-4

No.	Summary	Location	Block/Lot	Proposed Local Program Zoning Designation	Amendment
		801 Van Ness Ave, San Francisco, CA 94109	0738005	130//300-R-4	140//350-R-4
		830 Eddy St, San Francisco, CA 94109	0738018	130//300-R-4	140//350-R-4
		860 Eddy St, San Francisco, CA 94109	0738007	130//300-R-4	140//350-R-4
		815 Eddy Street, San Francisco, CA 94109	0743001	130//300-R-4	140//350-R-4
		799 Van Ness Avenue, San Francisco, CA 94109	0743204	130//300-R-4	140//350-R-4
		821 Eddy Street, San Francisco, CA 94109	0743015	130//300-R-4	140//350-R-4
		725 Van Ness Ave, San Francisco, CA 94102	0743002	130//300-R-4	140//350-R-4
		701 Van Ness Ave, San Francisco, CA 94102	0743203	130//300-R-4	140//350-R-4
5	Increasing heights along Pine Street between Leavenworth and Larkin	1390 Pine Street, San Francisco, CA 94109	0250009	65//120-R-4	80//140-R-4
		1372 Pine Street, San Francisco, CA 94109	0250008	65//120-R-4	80//140-R-4

No.	Summary	Location	Block/Lot	Proposed Local Program Zoning Designation	Amendment
		1370 Pine Street, San Francisco, CA 94109	0250007	65//120-R-4	80//140-R-4
		1350 Pine Street, San Francisco, CA 94109	0250006	65//120-R-4	80//140-R-4
		1346 Pine Street, San Francisco, CA 94109	0250005	65//120-R-4	80//140-R-4
		1330 Pine Street, San Francisco, CA 94109	0250004	65//120-R-4	80//140-R-4
		1324 Pine Street, San Francisco, CA 94109	0250003E	65//120-R-4	80//140-R-4
		1005 Hyde Street, San Francisco, CA 94109	0250003D	65//120-R-4	80//140-R-4
		1000 Hyde St, San Francisco, CA 94109	0251015	65//120-R-4	80//140-R-4
		1280 Pine Street, San Francisco, CA 94109	0251014	65//120-R-4	80//140-R-4
		1270 Pine Street, San Francisco, CA 94109	0251013	65//120-R-4	80//140-R-4
		1262 Pine Street, San	0251012	65//120-R-4	80//140-R-4

No.	Summary	Location	Block/Lot	Proposed Local Program Zoning Designation	Amendment
		Francisco, CA 94109			
		1254 Pine Street, San Francisco, CA 94109	0251011	65//120-R-4	80//140-R-4
		1250 Pine Street, San Francisco, CA 94109	0251010	65//120-R-4	80//140-R-4
		1234 Pine St, San Francisco, CA 94109	0251009	65//120-R-4	80//140-R-4
		1220 Pine Street, San Francisco, CA 94109	0251008	65//120-R-4	80//140-R-4
		1200 Pine Street, San Francisco, CA 94109	0251007	65//120-R-4	80//140-R-4
		1385 Pine St, San Francisco, CA 94109	0278012	80//120-R-4	80//140-R-4
		1359 Pine St, San Francisco, CA 94109	0278019	80//120-R-4	80//140-R-4
		1355 Pine St., San Francisco, CA 94109	0278016	80//120-R-4	80//140-R-4
		1331 Pine St., San Francisco, CA 94109	0278020	80//120-R-4	80//140-R-4
		969 Hyde Street, San Francisco, CA 94109	0278001	80//120-R-4	80//140-R-4

No.	Summary	Location	Block/Lot	Proposed Local Program Zoning Designation	Amendment
		972 Hyde Street, San Francisco, CA 94109	0277025	80//120-R-4	80//140-R-4
		1243 Pine Street, San Francisco, CA 94109	0277021	80//120-R-4	80//140-R-4
		1235 Pine Street, San Francisco, CA 94109	0277022	80//120-R-4	80//140-R-4
		1225 Pine Street, San Francisco, CA 94109	0277023	80//120-R-4	80//140-R-4
		1201 Pine Street, San Francisco, CA 94109	0277001	80//120-R-4	80//140-R-4
6	Decreasing heights on North Point Street between Larkin and Hyde	ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025004A	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025004B	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025004C	40//65-R-4	40//40-R-4

No.	Summary	Location	Block/Lot	Proposed Local Program Zoning Designation	Amendment
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025004D	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025004E	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025004F	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025008	40//65-R-4	40//40-R-4
			0025023	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025024	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street	0025028	40//65-R-4	40//40-R-4

No.	Summary	Location	Block/Lot	Proposed Local Program Zoning Designation	Amendment
		(west) and Hyde Street (east)			
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025029	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025032	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025039	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025042	40//65-R-4	40//40-R-4
		ENTIRE Block of North Point Street bound by Larkin Street (west) and Hyde Street (east)	0025045	40//65-R-4	40//40-R-4

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NOTICE OF ELECTRONIC TRANSMITTAL

DATE: November 3, 2025

TO: Angela Calvillo, Clerk of the Board of Supervisors

FROM: Debra Dwyer, Principal Environmental Planner, 628.652.7576 or Debra.Dwyer@sfgov.org

RE: Environmental Review for the Family Zoning Program
Board Files 250700, 250701, and 250966

In compliance with San Francisco's Administrative Code Section 8.12.5 "Electronic Distribution of Multi-Page Documents," the Planning Department is submitting a memorandum addressing analysis of proposed amendments to the family zoning program as heard at the Land Use and Transportation Committee hearing on October 20, 2025.

The Land Use and Transportation Committee of the Board of Supervisors will hold a hearing on the Family Zoning Program on November 3, 2025. These environmental documents are associated with Board Files 250700, 250701, and 250966. For questions regarding the environmental review for this project, please contact Ryan Shum, 628.652.7542 or ryan.shum@sfgov.org.

Enclosure

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MEMORANDUM 2

Date:	November 3, 2025
To:	San Francisco Board of Supervisors
From:	Lisa Gibson, Environmental Review Officer – lisa.gibson@sfgov.org , (628) 652-7571 Debra Dwyer, Principal Planner – debra.dwyer@sfgov.org, (628) 652-7576 Ryan Shum, Senior Planner – ryan.shum@sfgov.org, (628) 652-7542
RE:	CEQA Analysis for Family Zoning Plan – Proposed Amendments Planning Case Nos. 2019-016230ENV, 2021-005878CWP, and 2021-005878GPA Board file nos. 250700, 250701, and 250966
Attachments:	Attachment A – Summary Table for October 20th Land Use & Transportation Committee Amendments

Introduction

The purpose of this memorandum is to document why proposed amendments to the Family Zoning Plan legislation do not require further analysis pursuant to the California Environmental Quality Act (CEQA) beyond the previously prepared environmental impact report, addendum, and supplemental memo.

Following the publication of the Housing Element 2022 Update Final Environmental Impact Report (FEIR) and adoption of the Housing Element, the San Francisco Planning Department (department) undertook an iterative process to develop a proposed rezoning program. The Mayor introduced the Family Zoning Plan (rezoning program) on June 24 and July 28, 2025. The department reviewed the legislation in compliance with CEQA, determined that there would be no new environmental impacts from the legislation, and prepared an addendum to the FEIR to confirm the findings of the FEIR analysis. The department published Addendum No. 1 to the Housing Element 2022 Update FEIR (addendum) on September 3, 2025, pursuant to CEQA.[1] The Planning Commission (commission) heard the rezoning program on September 11, 2025 and recommended its approval with modifications to the Board of Supervisors (board).

After the September 11 hearing at the Planning Commission, the Mayor submitted substitute legislation on September 30, 2025 that included minor changes to the zoning map and the planning code.[2] An October 16, 2025 memorandum to the file provided analysis for the modifications in the substitute legislation (Version 3

1 San Francisco Planning Department. *Addendum No. 1 to the Environmental Impact Report*. September 3, 2025. Available at: https://sfplanning.org/environmental-review-documents?title=housing+element&field_environmental_review_categ_target_id=All&items_per_page=10

2 San Francisco Planning Department. *Family Zoning Plan: September 30, 2025, Substitute Legislation (version 3).* Available at: https://sfgov.legistar.com/View.ashx?M=F&ID=14834613&GUID=01515652-61EE-41BB-B353-CFB0C61A2C95

– September 30, 2025) pursuant to CEQA Statute section 21166 and CEQA Guidelines section 15162-15164, and incorporated by reference analysis in the FEIR and addendum.

On October 20, 2025 the Land Use and Transportation Committee (land use committee) of the Board of Supervisors (board) held a hearing on the family zoning program. Proposed amendments to both the proposed zoning ordinance and zoning map were introduced (See attachment A). The land use committee will hold a second hearing on the family zoning program as well as the proposed amendments on November 3, 2025. This memorandum 2 provides analysis for the proposed amendments to the substitute legislation (Version 3 – September 30, 2025) pursuant to CEQA Statute section 21166 and CEQA Guidelines section 15162-15164, and incorporates by reference analysis in the FEIR, addendum, and supplemental memorandum.

Description and Analysis of Proposed Amendments

The full text of the proposed ordinances and map changes are available online at on the board's Legislative Research Center (https://sfbos.org/legislative-research-center-lrc) under board file nos. 250700, 250701, and 250966.

The proposed amendments include modifications to the Zoning map as well as the Planning Code. The proposed modifications with the potential to result in physical environmental effects are discussed further below. Table 1 below presents the environmental analysis of proposed map changes. Table 2 presents the potential environmental analysis of proposed planning code changes.

TABLE 1: CEQA Analysis of Map Changes

#	Block/Lot(s)	Amendment	Sponsor	CEQA Analysis
1	0446/002,003; 0452/002 [Safe way site, and Ghiradelli Square]	Reclassify height limit and bulk district from 65' to 40//40-R-4.	Sherill	Proposed modification would not increase height or number of units allowed compared to the rezoning program analyzed in the addendum. No further analysis required.
2	0025/east of and including 008 [Northpoint, north side between Hyde and Larkin]	Reclassify zoning from 40//65-R-4 to 40//40-R-4	Sherill	Proposed modification would not alter the maximum height or density or number of units allowed compared to the rezoning program analyzed in the addendum. No further analysis required.
3	1070/ 001A, 003 [Geary, between Wood and Emmerson, northside]	Reclassify 140' to 50//85-R-4	Sherill	Proposed modification would not alter the maximum height or density or number of units allowed compared to the rezoning program analyzed in the addendum. No further analysis required.
4	Various	Various – Remove all priority equity geographies	Chen	Would not change height or density compared to existing conditions. No further analysis required.

#	Block/Lot(s)	Amendment	Sponsor	CEQA Analysis
5	Various	Removes Article 10 structures (Local Landmarks). (pending proposal)	Mandelman	Would not change height or density compared to existing conditions. No further analysis required.
6	All NCs Various LOWER HEIGHTS IN NEIGHBORHOOD and COMMERCIAL DISTRICTS (OTHER THAN GEARY)	Remove from parcel table and maps completely all parcels in District 1. Lowers height to 40' (Inner Clement, Outer Clement, Outer Balboa, and some other non-named NCs), Decreases heights in many other locations: All RTO-C will be decreased from 85' to 65' (from 50//85 RTO-C to 40//65 or 50//65.)	Chan	Remove proposed changes to areas in District 1 from proposed zoning program. No further analysis is required.
7	Coastal Zone District 1	Blocks: 1591, 1593, 1596, 1598, 1689, 1690, 1691, 1481, 1483 [approx. 122 parcels]	Chan	Remove parcels on these blocks from the proposed zoning program; no analysis required.

Table 2: CEQA Analysis of Planning Code Changes

#	Planning Code Sec.	Sponsor	Amendment	CEQA Analysis
1	206.10(b)(9)	Melgar	EXEMPT RENT-CONTROLLED BUILDINGS OVER 2 UNITS FROM LOCAL PROGRAM: Such buildings would not be eligible for the local program but could still use State programs, if applicable.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the proposed zoning program analyzed in the addendum. No further analysis required.
2	206.10(b)(9)	Melgar	NO DEMOLITION OR CONVERSION OF TOURIST Hotels**:** Remove tourist hotels from Local Program eligibility.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning

#	Planning Code Sec.	Sponsor	Amendment	CEQA Analysis
				program analyzed in the addendum. No further analysis required.
3	344 (d)(13)	Melgar	NO DEMOLITION OR CONVERSION OF TOURIST HOTELS IN HOUSING SUSTAINABILITY DISTRICT. Adds eligibility criteria in HSD that project may not demolish or convert any portion of a Tourist Hotel.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
4	334 (c)	Melgar	TECHNICAL CLARIFICATION: Affirms that nothing in Section 334 (Housing Sustainability District) abrogates permit, license, or other requirements codified outside the planning code.	The proposed modification would not result in physical impacts. No further analysis required.
5	206.10(d)(1)(B)	Chen	REINSTATES LOCAL PROGRAM UNIT MIX REQUIREMENT: Removes reduced unit mix requirement in the local program and defers to existing unit mix requirements in Planning Code 207.6 and 207.7.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
6	334(d)(3)	Chen	NO LOCAL PROGRAM MODIFICATIONS OF UNIT MIX: includes unit mix as an exclusion that cannot be modified through a Major Modification.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
7	249.11 (a)(2), (d) (1-3)	Chen	100% AFFORDABLE ON SFMTA SITES: For the SFMTA Special Use District (SUD), -Add findings establishing the objective of prioritizing the SFMTA sites for 100% affordable housing -Add pre-application process with a feasibility study modeling the site as 100% affordable housing, at least one pre-application meeting (publicly noticed), and documentation of consistency with Housing	The proposed modification would not result in physical impacts. No further analysis required.

#	Planning Code Sec.	Sponsor	Amendment	CEQA Analysis
			Element Actions 1.2.6 and 1.2.7.	
8	270(i)(2)	Mandelman	EXEMPT HISTORIC LANDMARKS FROM REZONING: establishes that Article 10 buildings are excluded from the R-4 Height and Bulk District, specifically: "Lots that contain a structure that has been designated as a historic landmark or a contributor to a historic district, pursuant to Article 10."	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
9	121.7(e)	Mandelman	RESTRICT LOT MERGERS WITH HISTORIC PROPERTIES: restricts all A-rated sites (Article 10, Article 11, National Register listed or eligible; Cal register listed or eligible) from lot mergers unless project maintains historic resource, compliant with Preservation Design Standards. Applicable historic resources: Any Lot with a historic resource that is - * designated as a landmark or listed as a contributor to or located within a historic district under Article 10; listed as a Significant or Contributory Building under Article 11; listed in the California Register of Historical Resources or the National Register of Historic Places; * identified in an adopted survey or historic context statement as potentially eligible for individual listing in the California Register of Historical Resources or the National Register of Historic	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.

#	Planning Code Sec.	Sponsor	Amendment	CEQA Analysis
			Places" * or, located within an historic district that is listed in, or identified in an adopted survey or historic context statement as potentially eligible for listing in, the California Register of Historical Resources or the National Register of Historic Places."	
10	206.10(e)(2)	Sauter	ADDS "WARM SHELL" RETAIL INCENTIVE: provides edits to Warm Shell definition to delineate Food Service Warm Shell and General Warm Shell. Up to 3.0 square-foot bonus for Food Service and up to 2.5 square-foot bonus for General Warm Shell. Also clarifies how square footage bonuses may or may not be combined to result in additional height.	The proposed modification may result in an incremental increase in height of up to one to three additional story(ies)[3] and a marginal increase in the number of units allowed on a project site. **Preservation.** Future development projects that utilize this proposed bonus would be required to preserve the historic resource on-site and comply with the Preservation Design Standards so that the project would not result in a significant and unavoidable impact on the historic resource. Therefore, the proposed modification would not result in a new or substantially more severe significant impact on built-environment historic resources. **Wind & Shadow.** The incremental increase in height would not result in new or more significant shadow or wind impacts and would be subject to project-level environmental review, as applicable. FEIR shadow and wind mitigation measures to reduce shadow and wind impacts, respectively, would apply, as applicable; the planning department would determine whether shadow or wind mitigation measures are required during project-level environmental review.

3 The various square footage bonuses cannot cumulatively add more than one story onto a building, except on projects involving historic preservation on the parcel (see proposed code change #12 "Square Footage Bonus and Code Flexibility for Preservation of Historic Structures". Projects that utilize the square footage bonus and code flexibility for preservation of historic structures may be allowed up to two additional stories for the preservation bonus, plus one additional story cumulatively for the non-preservation incentives. In total, a project may be allowed to add up to three stories if they achieve the maximum allowable square footage bonus for both the preservation and non-preservation incentives. However, note that the square footage bonuses would not automatically grant additional height as horizontal bonuses would be considered and the total amount of square footage bonus would need to add up to one additional story. Furthermore, parcels in residential districts would not be allowed to use the additional square footage bonus as height at all and would be required to use the bonus space in other horizontal ways (e.g., reduced rear yard, etc.).

#	Planning Code Sec.	Sponsor	Amendment	CEQA Analysis
				Other Topics. The potential additional units on-site would be similar in nature to other housing units in the rezoning and on the project site, and would represent a marginal increase over the number of units allowed without the square footage bonus. Thus, the marginal increase in units would not result in new or substantially more severe impacts that were not previously identified in the FEIR and addendum.
11	206.10(e)(5)	Sauter	ADDS STOREFRONT REPLACEMENT INCENTIVE: Adds 1.5 square-foot bonus incentive for Replacement of Commercial Space, defined as a space that has 90-100% the space of the original space, and the same linear storefront dimensions (with allowance for a small lobby).	The proposed modification may result in an incremental increase in height of up to one to three additional story(ies)[4] and a marginal increase in the number of units allowed on a project site. **Preservation.** Future development projects that utilize this proposed bonus would be required to preserve the historic resource on-site and comply with the Preservation Design Standards so that the project would not result in a significant and unavoidable impact on the historic resource. Therefore, the proposed modification would not result in a new or substantially more severe significant impact on built-environment historic resources. **Wind & Shadow.** The incremental increase in height would not result in new or more significant shadow or wind impacts and would be subject to project-level environmental review, as applicable. FEIR shadow and wind mitigation measures to reduce shadow and wind impacts, respectively, would apply, as applicable; the planning department would determine whether shadow or wind mitigation measures are required during project-level environmental review. **Other Topics.** The potential additional units on-site would be similar in nature to other housing units in the rezoning and on the project site, and would represent a marginal increase over the number of units allowed without the square footage bonus. Thus, the marginal increase in units would not result in

4 See footnote 3.

#	Planning Code Sec.	Sponsor	Amendment	CEQA Analysis
				new or substantially more severe impacts that were not previously identified in the FEIR and addendum.
12	206(e)(6)(B)	Sauter	ADDS HISTORIC STOREFRONT PRESERVATION INCENTIVE: Adds incentive to retain historic storefronts per Preservation Design Standards (additional 0.25 gross-square-feet per square foot of storefront, added to other Adaptive Reuse incentive).	The proposed modification may result in an incremental increase in height that may be combined with other Adaptive Reuse incentives. See discussion in item 11. This modification would not result in new or substantially more severe impacts that were not previously identified in the FEIR and addendum.
13	206(e)(4)(A)	Sherrill, Sauter	ADDS 2-BEDROOM UNIT INCENTIVE: Adds incentive for additional 2 BD units above what is required (add 250 sf for each 2 BD unit)	The proposed modification would offer additional bulk for providing larger units. It would not alter the maximum height or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
14	Various	Chan	REMOVES FORM-BASED DENSITY IN THE BASE ZONING in all districts, and reverts density to existing density limits (applicable to Dwelling Units, Group Housing, Senior Housing)	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
15	209.4	Chan	NO FORM-BASED ZONING FOR NEW RTO-C DISTRICT: Updates the RTO District Zoning Control Table RTO-C column changing form-based density to density allowed in the nearest NC district.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
16	206.10 (b)(4)	Chan	EXPANDS CATEGORIES OF HISTORIC RESOURCES FOR PROHIBITION OF DEMOLITION AND ADDS NO ALTERATIONS OF HISTORIC RESOURCES IN LOCAL PROGRAM: Expands universe of historic resources ineligible for Local Program from listed resources to those eligible	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.

#	Planning Code Sec.	Sponsor	Amendment	CEQA Analysis
			and "potentially eligible", including non-contributing sites that are within districts. Expands the historic resource protection by clarifying that in addition to not demolishing, it does not "substantially alter a historic resource".	
17	206.10 (b)(10)	Chan	NO RESIDENTIAL DEMOLITIONS IN LOCAL PROGRAM: Adds "(9) does not demolish, remove, or convert to another use any existing Dwelling Unit(s), or Residential Flat" under HC-SF applicability.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
18	334 (g)	Chan	30-MONTH "SHOT CLOCK": Adds a "Progress Requirement" through expiration if a project sponsor has not procured a building or site permit for construction within 30 months of project approval, with the ability to extend by 6 months (or longer in the case of appeal or lawsuit).	The proposed modification would not result in a physical environmental effect. No further analysis required.
19	206.10 (c)	Chan	RESTRICTS LOCATION OF OFF-SITE BMR UNITS: Removes "shall provide the required units within the R-4 Height and Bulk District or" under Inclusionary Housing Ordinance Alternatives. (Instead, revert to earlier requirement that they be provided within ½ mile of project site).	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
20	317 (c)(12)	Chan	STRENGTHEN REVIEW OF RESIDENTIAL FLAT DEMOLITION: Removes the CUA exemption for projects with residential flats that increase the number of units on a property; under this amendment, these projects	The proposed modification is a process change would not result in a physical environmental effect. No further analysis required.

#	Planning Code Sec.	Sponsor	Amendment	CEQA Analysis
			would require a CUA hearing.	
21	317 (g)(6)(L)	Chan	STRENGTHEN REVIEW OF RESIDENTIAL FLAT DEMOLITION: Removes CUA criteria language regarding whether residential flats maintain or increase the number of units on the lot that contain 2BD+ or that are at least equivalent in size to residential flats demolished.	The proposed modification is a process change would not result in a physical environmental effect. No further analysis required.
22	344 (d)(4)	Chan	NO ALTERATIONS OF HISTORIC RESOURCES IN HOUSING SUSTAINABILITY DISTRICT (HSD): Expands the historic resource protection by clarifying that in addition to not demolishing, it does not "substantially alter a historic resource"	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
23	249.11	Chan	REMOVE SPECIFIC SFMTA PARCELS FROM SUD: Removes Block/lot 1596/044 and 045 from the Non-contiguous SFMTA SUD (La Playa bus turnaround).	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
24	Section 8 (g)	Chan	REMOVES REFERENCE TO SFMTA SUD IN THE LOCAL COASTAL PROGRAM: In the description of deletes section (g) which references planning code section 249.11 SFMTA SUD	The proposed modification would not result in a physical environmental effect. No further analysis required.
25	206.10 (a)	Chan	AFFIRM LOCAL PROGRAM COMPLIANCE WITH ARTICLE 4 (FEES, AFFORDABILITY): Adds "Except as provided in this Section 206.10, all HC-SF shall comply with Article 4 of the Planning Code"	The proposed modification would not result in a physical environmental effect. No further analysis required.
26	206.10 (d)(4)	Chan	AFFIRM LOCAL PROGRAM COMPLIANCE WITH ARTICLE 4 (FEES, AFFORDABILITY) AND TENANT PROTECTIONS: Adds an exclusions clause to	The proposed modification would not result in a physical environmental effect. No further analysis required.

#	Planning Code Sec.	Sponsor	Amendment	CEQA Analysis
			current requirements clarifying FZP is not relieving a HC-SF project from complying with : Article 4 of the Planning Code other than as specified in this subsection (d); Section 202.17; or any tenant protections contained elsewhere in the Planning Code, including Section 317 et seq ., and Chapter 37 of the Administrative Code.	

Conclusion

The proposed amendments to the family zoning program zoning map and planning code could result in minor increases in height, density, and housing unit growth in certain parts of the city, primarily in well-resourced areas. Limited growth could occur in areas adjacent to well-resourced areas, but the Housing Element FEIR and addendum acknowledged that the height and growth distribution depicted in the FEIR was hypothetical and not intended to be a precise depiction of future zoning changes. In addition, the FEIR indicated that future growth would likely be concentrated in, but is not limited to, the well-resourced areas of the city. The incremental growth would not result in new or substantially more severe significant impacts that were not already disclosed in the EIR. The mitigation measures that were identified in the FEIR would continue to apply to future development projects as determined applicable, and the department will determine which mitigation measures would apply during the project-specific environmental review phase. For these reasons, additional environmental review is not required for the proposed amendments to the legislation as described above.

Attachment A

SF FAMILY ZONING PLAN
October 20th Land Use & Transportation Committee Amendments

NOTE: The amendments in the attached summary were added to the Family Zoning Plan ordinances at the October 20, 2025 Board of Supervisors Land Use & Transportation Committee hearing. The ordinances are continuing to be reviewed by the Board of Supervisors and are subject to change.

SF FAMILY ZONING PLAN

October 20th Land Use & Transportation Committee Amendments

NOTE: The amendments listed below were added to the Family Zoning Plan ordinances at the October 20, 2025 Board of Supervisors Land Use & Transportation Committee hearing. The ordinances are continuing to be reviewed by the Board of Supervisors and are subject to change.

ZONING MAP AMENDMENTS

#	Board File	Location	Block	Lot	Sponsoring Supervisor	Amendment
1	251071	Safeway site @ Marina Boulevard & Laguna St	0446	002, 003	**Sherill**	**LOWER HEIGHT OF SAFEWAY SITE:** Lower height from 65' to 40//40-R-4.
2	251071	Ghirardelli Square	452	002	**Sherill**	**LOWER HEIGHT OF GHIRADELLI SQUARE (A HISTORIC LANDMARK):** Lower height from 65' to 40//40-R-4
3	251071	North Point, north side btwn. Hyde and Larkin	0025	all parcels east of and including 008	**Sherill**	**LOWER HEIGHT OF PARCELS ON NORTH SIDE OF NORTH POINT STREET BETWEEN HYDE AND LARKIN:** Lower height from 40//65-R-4 to 40//40-R-4
4	251071	Geary, btwn. Wood & Emerson, North side	1070	001A, 003	**Sherill**	**LOWER HEIGHT OF TWO GEARY BLVD PARCELS:** Lower height from 140' to 50//85-R-4

#	Board File	Location	Block	Lot	Sponsoring Supervisor	Amendment
5	251071	Priority Equity Geographies	Various	Various	**Chen**	**REMOVE ALL PRIORITY EQUITY GEOGRAPHIES (PEGs) FROM REZONING:** Remove all PEGs from Zoning Tables (Table 1) Remove all PEGs from reclassifying residential to RTO-C Remove all PEGs from reclassifying residential districts other than RTO to RTO-1 Remove all PEGs from reclassifying from NC or P to C-2 Remove all PEGs from P to Mixed-Use or NCs Remove all PEGs from changing the height limits in the R-4 Remove all PEGs from rezoning to R-4. Remove Block 0019 (MTA Kirkland Yard) at Stockton Street and North Point Street Remove all PEGs from increasing heights to 40' if in height districts that are less than 40' Remove all PEGs from being reclassified to 40'//50' Remove all PEGs from being reclassified to 40'//65' Remove all PEGs from being reclassified to 50'//85' Remove all PEGs from being reclassified to 85' Remove all PEGs from being reclassified to base heights of 50'-80' and to HC-SF heights of 120'-180' Remove all PEGs from being reclassified to base heights of 100'-140' and HC-SF heights of 240'-350' Remove Van Ness Market bounded by Polk and Ellis from base heights of 195'-260' and HC-SF heights of 490'-650'. Instead, bound it by Van Ness, O'Farrell, etc.
6	Pending - may be proposed at 11/3 Land Use & Transportation Committee	Article 10 structures throughout the rezoning.	Various	Various	**Mandelman**	**REMOVE ALL ARTICLE 10 HISTORIC BUILDINGS (LOCAL LANDMARKS).** Maintains the properties in the ordinance only where they are changing from RTO to RTO-1, to clarify the name change.

#	Board File	Location	Block	Lot	Sponsoring Supervisor	Amendment
7	251071	District 1	All NCs and RTO-Cs in District 1	Various	**Chan**	**LOWER HEIGHTS IN NEIGHBORHOOD COMMERCIAL DISTRICTS (OTHER THAN GEARY) AND ON PROPOSED RTO-C DISTRICT THROUGHOUT ALL OF DISTRICT 1.** *** On most NC corridors, rolls back heights to current heights:** Lowers height to 40' (Inner Clement, Outer Clement, Outer Balboa, and some other non-named NCs), *** Decreases heights in many other locations:** All RTO-C will be decreased from 85' to 65' (from 50//85 RTO-C to 40//65 or 50//65.)
8	251071	Coastal Zone portion of District 1	1591, 1593, 1596, 1598, 1689, 1690, 1691, 1481, 1483	Various	**Chan**	**REMOVE MANY PARCELS IN DISTRICT 1 IN THE COASTAL ZONE** (122 parcels). Removes all parcels proposed for zoning with form-based density -- everything zoned NC, RTO-C -- removing all parcels that face Fulton, Balboa and La Playa. Removes Safeway site, SFMTA bus lot site. Also removes parcels along El Camino del Mar and Seal Rock Dr.

PLANNING, BUSINESS & TAX REGULATIONS CODE AMENDMENTS

#	Board File	Page	Line	Planning Code Sec.	Sponsoring Supervisor	Amendment
1	251072 and 251073	13	13-15	206.10(b)(9)	**Melgar**	**EXEMPT RENT-CONTROLLED BUILDINGS OVER 2 UNITS FROM LOCAL PROGRAM:** Such buildings would not be eligible for the Local Program (but could still use State programs, if applicable).
2	251073	13	18	206.10(b)(9)	**Melgar**	**NO DEMOLITION OR CONVERSION OF TOURIST HOTELS IN LOCAL PROGRAM:** Remove tourist hotels from Local Program eligibility. (They may still use State programs.)
3	251073	31	24	344 (d)(13)	**Melgar**	**NO DEMOLITION OR CONVERSION OF TOURIST HOTELS IN HOUSING SUSTAINABILITY DISTRICT (HSD):** Adds eligibility criteria in HSD that project may not demolish or convert any portion of a Tourist Hotel.
4	251073	27	18-19	334 (c)	**Melgar**	**TECHNICAL CLARIFICATION:** Affirms that nothing in Section 334 (Housing Sustainability District) cancels or repeals permit, license, or other requirements codified outside of the Planning Code.
5	251073	14-15	17-25; 1-4	206.10(d)(1)(B)	**Chen**	**REINSTATES LOCAL PROGRAM UNIT MIX REQUIREMENT:** Removes reduced unit mix requirement in the Local Program and defers to existing unit mix requirements in PC 207.6 and 207.7
6	251073	28	9	334(d)(3)	**Chen**	**NO LOCAL PROGRAM MODIFICATIONS OF UNIT MIX:** Includes unit mix as an exclusion that cannot be modified through a Major Modification
7	251073	166-167; 170	12-25; 1-6; 8-20	249.11 (a)(2), (d) (1-3)	**Chen**	**100% AFFORDABLE ON SFMTA SITES:** For the MTA Special Use District: - Add findings establishing the objective of prioritizing the MTA sites for 100% affordable housing - Add pre-application process with a feasibility study modeling the site as 100% affordable housing, at least one pre-application meeting (publicly noticed), and documentation of consistency with Housing Element Actions 1.2.6 and 1.2.7.

#	Board File	Page	Line	Planning Code Sec.	Sponsoring Supervisor	Amendment
8	Pending - may be proposed at 11/3 Land Use & Transportation Committee			270(i)(2)	**Mandelman**	**EXEMPT HISTORIC LANDMARKS FROM REZONING:** establishes that Article 10 buildings are excluded from the R-4 Height and Bulk District, specifically: "Lots that contain a structure that has been designated as a historic landmark or a contributor to a historic district, pursuant to Article 10"
9	251072	171-172	21-25; 1-8	121.7(e)	**Mandelman**	**RESTRICT LOT MERGERS WITH HISTORIC PROPERTIES:** restricts all A-rated sites (Article 10, A11, National Register listed or eligible; California Register listed or eligible) from lot mergers unless project maintains historic resource, compliant with Preservation Design Standards. Applicable historic resources: Any Lot with a historic resource that is: * designated as a landmark or listed as a contributor to or located within a historic district under Article 10; listed as a Significant or Contributory Building under Article 11; listed in the California Register of Historical Resources or the National Register of Historic Places; * identified in an adopted survey or historic context statement as potentially eligible for individual listing in the California Register of Historical Resources or the National Register of Historic Places; * or, located within an historic district that is listed in, or identified in an adopted survey or historic context statement as potentially eligible for listing in, the California Register of Historical Resources or the National Register of Historic Places.
10	251072 and 251073	18-19; 19-20	13-25 and 1-15; 2-25 and 1-4	206.10(e)(2)	**Sauter**	**ADDS "WARM SHELL" RETAIL INCENTIVE:** provides edits to Warm Shell definition to delineate Food Service Warm Shell and General Warm Shell. Up to 3.0 square footage bonus for Food Service and up to 2.5 square footage bonus for General Warm Shell. Also clarifies how square footage bonuses may or may not be combined to result in additional height.

#	Board File	Page	Line	Planning Code Sec.	Sponsoring Supervisor	Amendment
11	251072 and 251073	21-22; 22-23	21-25 and 1-18; 12-25 and 1-9	206.10(e)(5)	**Sauter**	**ADDS STOREFRONT REPLACEMENT INCENTIVE:** Adds 1.5 square footage bonus incentive for Replacement of Commercial Space, defined as a space that has 90-100% the space of the original space, and the same linear storefront dimensions (with allowance for a small lobby).
12	251072 and 251073	23; 23-24	7-10; 23-25 and 1	206(e)(6)(B)	**Sauter**	**ADDS HISTORIC STOREFRONT PRESERVATION INCENTIVE:** Adds incentive to retain historic storefronts per Preservation Design Standards (additional 0.25 gross square footage per square foot of storefront, added to other Adaptive Reuse incentive).
13	251073	21	14-17	206(e)(4)(A)	**Sherrill, Sauter**	**ADDS 2-BEDROOM UNIT INCENTIVE:** Adds incentive for additional 2-bedroom units above what is required (at 250+ square feet / 2-bedroom unit)
14	251073	Various	Various	Various	**Chan**	**REMOVES FORM-BASED DENSITY IN THE BASE ZONING** in all districts, and reverts density to existing density limits (applicable to Dwelling Units, Group Housing, Senior Housing)
15	251073	107	1-9	209.4	**Chan**	**NO FORM-BASED ZONING FOR NEW RTO-C DISTRICT:** Updates the RTO District Zoning Control Table RTO-C column changing form-based density to density allowed in the nearest NC district.
16	251073	12	20-Sep	206.10 (b)(4)	**Chan**	**EXPANDS CATEGORIES OF HISTORIC RESOURCES FOR PROHIBITION OF DEMOLITION AND ADDS NO ALTERATIONS OF HISTORIC RESOURCES IN LOCAL PROGRAM:** Expands universe of historic resources ineligible for Local Program from listed resources to those eligible and "potentially eligible", including non-contributing sites that are within districts. Expands the historic resource protection by clarifying that in addition to not demolishing, it does not "substantially alter a historic resource".
17	251073	13	16-17	206.10 (b)(10)	**Chan**	**NO RESIDENTIAL DEMOLITIONS IN LOCAL PROGRAM:** Adds “(9) does not demolish, remove, or convert to another use any existing Dwelling Unit(s), or Residential Flat” under Local Program applicability.
18	251073	29	8-16	334 (g)	**Chan**	**30-MONTH "SHOT CLOCK":** Adds a "Progress Requirement" through expiration if a project sponsor has not procured a building or site permit for construction within 30 months of project approval, with the ability to extend by 6 months (or longer in the case of appeal or lawsuit).

#	Board File	Page	Line	Planning Code Sec.	Sponsoring Supervisor	Amendment
19	251073	13	23	206.10 (c)	**Chan**	**RESTRICTS LOCATION OF OFF-SITE BMR UNITS:** Removes "shall provide the required units within the R-4 Height and Bulk District or" under Inclusionary Housing Ordinance Alternatives. (Instead, units revert to earlier requirement that they be provided within ½ mile of project)
20	251073	191	21-24	317 (c)(12)	**Chan**	**STRENGTHEN REVIEW OF RESIDENTIAL FLAT DEMOLITION:** Removes the Conditional Use Authorization exemption for projects with residential flats that increase the number of units on a property; under this amendment, these projects would require a Conditional Use Authorization hearing.
21	251073	192	6-9	317 (g)(6)(L)	**Chan**	**STRENGTHEN REVIEW OF RESIDENTIAL FLAT DEMOLITION:** Removes Conditional Use Authorization criteria language referencing whether residential flats maintain or increase the number of units on the lot that contain 2+ bedrooms or are at least equivalent in size to residential flats demolished.
22	251073	30-31	17-25 and 1-4	344 (d)(4)	**Chan**	**NO ALTERATIONS OF HISTORIC RESOURCES IN HOUSING SUSTAINABILITY DISTRICT (HSD):** Expands the historic resource protection by clarifying that in addition to not demolishing, it does not "substantially alter a historic resource"
23	251073	167	9	249.11	**Chan**	**REMOVE SPECIFIC SFMTA PARCELS FROM SPECIAL USE DISTRICT (SUD):** Removes 1596/044 and 045 from the Non-contiguous SFMTA SUD (La Playa bus turnaround).
24	251073	471	22-23	Section 8 (g)	**Chan**	**REMOVES REFERENCE TO SFMTA SPECIAL USE DISTRICT (SUD) IN THE LOCAL COASTAL PROGRAM:** In the description of deletes section (g) which references PC 249.11 SFMTA SUD
25	251073	11	23-24	206.10 (a)	**Chan**	**AFFIRM LOCAL PROGRAM COMPLIANCE WITH ARTICLE 4 (FEES, AFFORDABILITY):** Adds "Except as provided in this Section 206.10, all HC-SF projects shall comply with Article 4 of the Planning Code"

#	Board File	Page	Line	Planning Code Sec.	Sponsoring Supervisor	Amendment
26	251073	17-18	24-25; 1-2	206.10 (d)(4)	**Chan**	**AFFIRM LOCAL PROGRAM COMPLIANCE WITH ARTICLE 4 (FEES, AFFORDABILITY) AND TENANT PROTECTIONS:** Adds an exclusions clause clarifying Family Zoning Plan is not relieving a Local Program project from complying with: Article 4 of the Planning Code other than as specified in this subsection (d); Section 202.17; or any tenant protections contained elsewhere in the Planning Code, including Section 317 et seq., and Chapter 37 of the Administrative Code.

San Francisco Planning

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October 16, 2025

Ms. Angela Calvillo, Clerk
Board of Supervisors
City and County of San Francisco
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: Transmittal of Planning Department Case Number: 2021-005878PCWP
Housing Element 2022 Rezoning Initiatives – Affordable Housing Sites Analysis and Strategies (AHSAS)

Planning Commission Recommendation: **Informational**

Dear Ms. Calvillo:

On October 16, 2025, the Planning Department published the Draft Affordable Housing Sites Analysis and Strategies Report which will be presented to the Board of Supervisors Land Use and Transportation Committee along with the Family Zoning Plan on October 20, 2025.

As a part of the transmittal, the Planning Department is hereby requesting that the attached Draft AHSAS Report be uploaded to the Family Zoning Plan Board Files as supporting materials. The Family Zoning Plan Board File Nos. include: 250966, 250700, 250701, and 250985.

The Planning Department will publish the Final AHSAS Report along with additional appendices that will include various consultant memorandums on the Department's project webpage at a later date.

In the interim, if you have any questions or require further information, please do not hesitate to contact me.

Sincerely,

James Pappas
Manager, Policies and Strategies

cc: John Carroll, Office of the Clerk of the Board
Lisa Chen, Principal Planner
BOS.Legislation@sfgov.org

ATTACHMENTS :

Draft Affordable Housing Sites Analysis and Strategies Report

Affordable Housing Sites Analysis and Strategies

DRAFT REPORT

OCTOBER 2025

San Francisco Planning

MAYOR'S OFFICE OF
HOUSING & COMMUNITY DEVELOPMENT

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Acknowledgments

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We also thank our partners at the **Mayor's Office of Housing and Community Development**, including Dan Adams, Lydia Ely, Sheila Nickolopoulos, Mara Blitzer, and additional MOHCD staff, for their deep knowledge and contributions to shaping the strategies presented.

Appreciation is also extended to Leigh Lutenski and the **Office of Economic and Workforce Development** for their insight into implementation and alignment with broader economic development goals.

Finally, we acknowledge the valuable partnership and technical support of **Enterprise Community Partners** and **Century Urban**, whose expertise generated policy and financial research and analysis that informed recommendations that guided this report.

Executive Summary of the Affordable Housing Sites Analysis and Strategies Report

October 2025

San Francisco has the tools, sites, and expertise to advance its affordable housing goals, but only with sufficient, consistent financial resources. **The AHSAS provides research-based recommendations for managing limited resources while pursuing equity and geographic distribution objectives. Our affordable housing needs demand additional funding, balancing construction of the existing 12,600-unit pipeline with selective new acquisitions, cultivating opportunities on public, master-planned, and community-owned land, and creating pathways for diverse housing types across all neighborhoods.** By aligning site acquisition with funding availability, continuing cross-sector partnerships, and pursuing policy and program changes that expand tools to secure sites, San Francisco can build a more sustainable and equitable affordable housing future.

San Francisco has a target of facilitating 32,800 additional homes affordable at lower incomes by 2031. This target is part of the City's Regional Housing Needs Allocation (RHNA) for 2023-2031 from the Housing Element. The Affordable Housing Sites Analysis and Strategies addresses how the city will continue to develop its pipeline of existing affordable housing projects and acquire and develop additional sites for affordable housing. Led by SF Planning in collaboration with the Mayor's Office of Housing and Community Development (MOHCD) focuses on the following areas:

- **Pipeline -** Effectively managing the existing affordable housing development pipeline
- **Production** - Boosting the overall production of affordable housing units
- **Acquisition** - Identifying and acquiring new sites for future affordable housing development

The Affordable Housing Sites Analysis and Strategies includes substantial research, stakeholder engagement, and offers strategies based on research findings.

- **Research** covers the current affordable housing development pipeline and the City's pipeline management practices, identifies viable development sites for affordable housing, and analyzes financial and policy considerations for site acquisitions. Stakeholder engagement with affordable housing developers, community organizations, and other practitioners informed the research and strategies.
- **Recommended strategies**, based on research findings and stakeholder input, address pipeline management, geographic equity, partnership with public and nonprofit landowners, strategic market acquisitions, and expanding diverse housing types to address affordability.

Context and Findings

The Central Challenge: Funding

San Francisco's primary barrier to building more affordable housing is not lack of developable sites, but insufficient funding and high construction costs. Currently, over 12,600 affordable units across 59 projects are awaiting funding in pre-construction stages of the pipeline. At current production rates of approximately 650 new 100% affordable units annually, building out the existing pipeline could take over ten years. Development costs are now nearly $1 million per two-bedroom unit with construction costs making up more than 60% of development expenses.

In 2024 the Affordable Housing Leadership Council, a group of affordable housing leaders and experts, released recommendations on expanding funding and financing for affordable housing and lowering costs. The policymakers and agencies have acted on some recommendations, while others await further action. The Board of Supervisors recently passed a resolution calling on City agencies to assess funding tools for affordable housing including infrastructure finance districts in September 2025. This has advanced civic dialogue about ways to secure affordable housing funding.

Pipeline Management and Land Banking

MOHCD coordinates with other public agencies and affordable housing developers to provide funding from up to 25 different local funding sources along with state and federal funding to build an affordable housing pipeline of over 12,000 units. Click here for a brief overview of the City's affordable housing pipeline and related information. The current pipeline includes sites acquired in various ways:

- **Sites purchased in the private market** (2,087 units) or provided by private development agreements (634 units)
- **Sites on land from public agencies,** often as part of large mixed-income developments including development agreements like Treasure Island and Balboa Reservoir (2,320 units), HOPE SF rebuilding of public housing sties (1,415 units), and other public sites (471 units)
- **Former redevelopment projects** funded by OCII (2,494 units)
- **Rehabilitation/preservation projects** (3,195 units)

By holding the land for these projects before all the necessary funding is secured, the city has a de facto land banking process. The city acquires and holds sites until projects secure full financing and permits. Land banking, however, incurs holding costs. Managing this portfolio requires balancing long-term obligations with new opportunities while navigating volatile funding sources.

Geographic Distribution and Equity Goals

Like market-rate housing, affordable housing production is not equitably or evenly distributed across San Francisco. To meet the Housing Element goal of constructing at 25-50% of all new affordable homes in well-resourced areas, San Francisco will need to shift its present pattern of uneven geographic distribution of affordable housing and housing production in general.

- Currently most housing development of all kinds is concentrated in four of 11 supervisorial districts, and the existing Affordable Housing Pipeline is primarily concentrated in Supervisorial Districts 5, 6, 9, and 10, which cover primarily equity communities within the city's eastern neighborhoods.

- Meanwhile, Districts 1, 2, 4, 7, 8, and 11 have few or no 100% affordable projects in the pipeline. These districts are where more of the city's higher resource areas are found.

Most affordable housing sites in the pipeline are concentrated outside of San Francisco's well-resourced Housing Opportunity Areas (HOAs) in the center, west, and north of the city. This pattern continues the exclusion of affordable multifamily housing from HOAs. To meet Housing Element goals and the State's Affirmatively Furthering Fair Housing (AFFH) requirements, San Francisco will need to develop at least 25% of all new affordable units in HOAs. The proposed Family Zoning Plan rezoning will create capacity for multifamily housing in these historically exclusionary areas, opening pathways for both 100% affordable developments and inclusionary units in mixed-income projects.

Parcel Suitability Analysis for Affordable Housing

The parcel suitability analysis identified approximately 3,410 viable sites citywide with capacity for roughly 247,000 affordable housing units that meet the City's criteria for 100% affordable housing projects. These sites include 1,204 individual parcels of at least 8,000 square feet (the minimum size requirement for typical subsidized 100% affordable housing) as well as 2,206 contiguous parcels viable through parcel assembly. District 6 shows the greatest capacity, followed by Districts 2, 3, and 9. Site suitability and availability, however, do not guarantee development feasibility. Individual property owners may not be interested in selling or developing due to profitable current uses, low tax basis, or complex ownership structures.

The parcel suitability analysis demonstrates that land supply is not the constraining factor on meeting our affordable housing production goals. **The proposed Family Zoning Plan was not evaluated in this analysis but will increase the capacity for affordable housing even further** by increasing height and density and allowing flexible standards for affordable housing as well as generating funding for affordable housing. Ultimately, advancing our affordable goals depends on acquisition aligned with funding availability for construction.

Financial and Policy Research and Best Practices

The City procured and incorporated comprehensive research by consultants on financial considerations to interrogate the affordable housing financial landscape in San Francisco.

FINANCIAL CONSIDERATIONS

Land prices in San Francisco are higher than many other cities but have been relatively stable. Construction costs and their rapid increase in recent years are responsible for most of the cost for affordable housing units. The average land cost has been $121,000 per unit over the past decade. Land prices may be commonly thought to be a very significant part of building affordable housing, however, they only make up 10% of total development costs, on average, while construction costs account for 60% or more. Construction costs have risen 31% in the last 4 years, pushing total development costs to around $1 million per affordable two-bedroom unit.

Per unit land costs for affordable housing has not shown to be significantly affected by rezoning, and is significantly influenced by economic conditions, location and landowner expectations. Analysis of a major rezoning in the last 20 years shows that rezoning to allow more density of housing can be associated with a drop in land costs on a per unit basis. Recent land transactions for affordable housing also indicate that landowners may expect comparable prices for multifamily development sites regardless of current zoning and regardless of whether the development is market rate or affordable. It is important to note that landowners simply may not sell unless the purchase price exceeds the value of current revenue from their property. Development requirements such as impact fees or inclusionary housing can capture value from rezoning though this value is largely dependent on economic conditions with land sales, development, and resulting revenue slowing when projects are not financially feasible. While land costs may rise on a per acre basis with more intensive zoning (since the acreage cost is influenced by the possible number of units to be built on the property), development cost per unit of affordable housing is not affected.

Purchasing land and holding it until development funds are available results in holding costs for the city. The City's holding costs for properties acquired but awaiting development range from $34,000 to $453,000 annually per site, adding 1–17% to acquisition costs. Interim uses (e.g., pop-ups, leases, nonprofit uses) could help offset these costs so long as they are revenue-generating. Public-serving interim uses—as opposed to profit-driven use—often require additional public funding to open and operate, adding to holding costs.

If ad hoc land banking continues, using ground leases or options to purchase can reduce expenses and reduce overall costs. Ground leases and delayed acquisitions through options to purchase could reduce upfront expenses and holding costs. In addition, practitioner feedback offered strategies for nimble funding for acquisitions, including the need for funding predictability and support for tools like transfer tax relief, leasing options, and nonprofit financial intermediaries.

POLICY BEST PRACTICES

Comparing San Francisco's practices to other cities, research affirmed effective strategies are already employed in San Francisco. Successful strategies include, for example, coordinated NOFAs

for site acquisition and development when local funding is available to supplement state and federal funds.

Establishing stable funding and aligning pipeline growth with funding capacity were important practices to build and grow the affordable housing pipeline efficiently.

Public land and nonprofit land offer ongoing potential for affordable housing sites. Public land may continue to be used for affordable housing based on site conditions and financial and operational needs of public agencies. Faith-based and nonprofit owned land (approximately 280 acres citywide) for affordable housing may be supported through technical assistance and use of emerging tools like Senate Bill 4 streamlining.

"Missing middle" housing strategies emerged as important to encourage more diversity of affordable housing types: single-stair building reform as well as reforms to elevator requirements, pre-approved designs, and the Greek *antiparochi* model (property-for-units exchanges) could all be useful approaches to expand housing options without subsidy.

Recommended Strategies

1. Scale Acquisitions to Funding and Pipeline

- **Build the pipeline while growing it -** Continue funding the development of existing pipeline projects while scaling and pacing new site acquisitions proportional to available funding.

- **More funding, new sources, and more consistent funding-** Explore additional funding tools identified in the Affordable Housing Leadership Council report, including exploring Enhanced Infrastructure Finance Districts (EIFDs), as called for by the Board of Supervisors. Other funding sources could include potential future bonds, one-time or ongoing budget allocations, as well as state and regional sources. Funding is highly variable, leading to uncertainty in pipeline planning, and more consistency in funding would help with pipeline management.

2. Expand Geographic Distribution

- **One affordable development per district -** Work towards at least one affordable housing project in the development pipeline in all 11 Supervisorial Districts, as funding availability allows. Over time, this will address the geographic inequity while continuing investment throughout the city.

- **Acquire sites in western & northern neighborhoods –** The Housing Element goal is that 25% of new affordable homes will be in the city's central, western & northern neighborhoods. Expanding site acquisition efforts to these well-resourced neighborhoods will help meet this goal and affirmatively further fair housing**. Site acquisition and development would continue in equity communities** while increasing affordable housing production citywide.

3. Develop Public and Nonprofit-Owned Land

- **Work with Partners** - Continue working with public agencies, faith-based organizations, and nonprofits to develop underutilized sites that meet the City's criteria for affordable housing.

- **Technical Assistance -** Offer technical assistance and capacity-building programs for faith-based organizations through public, philanthropic and other sources as well as flexible predevelopment funding tailored to organizational contexts.

4. Implement Market Acquisition Tools

- **Deploy strategic incentives and mechanisms** to improve the competitiveness of affordable housing providers to acquire sites through:

    - **Transfer tax exemption** for affordable housing sales (with guardrails against price inflation).
    - **Expansion of Community Opportunity to Purchase Act** (COPA) to cover commercial and development sites.
    - **Partnership for rapid and nimble acquisitions** with the Housing Accelerator Fund, other Community Development Financial Institutions (CDFIs), philanthropy, and other partners.

- **Act opportunistically** when funding is available to pursue distressed properties, foreclosures, and below-market opportunities for suitable development sites in targeted geographies.

5. Enable "Missing Middle" Affordable Housing

- **Support small (2-20 units) and mid-size (21-49 units) developments** through:
    - Form-based density standards in residential districts
    - Single-stair and elevator building code reform to increase feasibility
    - Pre-approved design templates for expedited permitting
    - Exploration of innovative models like antiparochi ("flats-for-land" exchanges), working with private, philanthropic, and nonprofit sectors to develop successful development models.

Section 1: Introduction

San Francisco's 8-year housing plan (the 2022 Housing Element Update) includes permitting and facilitating development of 82,000 housing units, including 32,800 units affordable at lower-incomes. These are the ambitious state-mandated Regional Housing Needs Allocation (RHNA) targets. The Housing Element also calls for affirmatively furthering fair housing (AFFH) by increasing affordable housing in well-resourced neighborhoods as well as continuing to invest in historically marginalized communities. The **Affordable Housing Sites Analysis and Strategies (AHSAS)** seeks to make progress on the City's affordable housing targets (32,000 units). The AHSAS complements the **2024 Affordable Housing Leadership Council report** that provides recommendations on funding, financing, cost lowering, and innovation for affordable housing.

The AHSAS, led by the San Francisco Planning Department in collaboration with the Mayor's Office of Housing and Community Development (MOHCD), focuses on three goals:

(1) Support the effective management of the existing affordable housing development pipeline (Housing Element Action 1.2.4);

(2) Ensure ongoing affordable housing production along with equitable geographic distribution of affordable housing. (Housing Element Action 1.2.1)

(3) Use both strategic and opportunistic approaches[1] to identify and acquire new sites for affordable housing development (Housing Element Action 1.2.1);

This work was informed by close coordination among city agencies and input from affordable housing developers and community partners to address community priorities and the City's equity goals.

Structure of the AHSAS Report

- **Section 1:** Introduction to the project purpose and structure and its connection to the Housing Element, including policies and programs it helps implement and how it relates to rezoning
- **Section 2**: Describes community engagement, including the context that led to the development of AHSAS and a summary of stakeholder engagement for the project
- **Section 3:** Reviews the funding needs for affordable housing, the Affordable Housing Leadership Council recommendations, and emerging funding initiatives.

1 Managing San Francisco's affordable housing pipeline combines strategic planning with opportunistic action. Strategically, investments are aligned with funding and policy goals, including equitable geographic distribution and support for nonprofits and religious organizations, through tools like the Housing Accelerator Fund and sustained technical assistance. Opportunistically, the City mobilizes public and private resources to acquire public sites, nonprofit or religious-owned parcels, and privately held properties available at lower costs. This dual approach ensures a flexible, effective pipeline that advances long-term housing goals while responding to immediate opportunities.

- **Section 4:** Describes the existing Affordable Housing Pipeline management practices and the status of geographic distribution of the existing pipeline.

- **Section 5:** Presents the local, state, and federal policies supporting affordable housing as well as the parcel suitability analysis, which identifies sites for affordable housing in Housing Opportunity Areas[2] and in Equity Geographies.

- **Section 6:** Summarizes financial research by Century Urban including trends in site acquisition, land holding, and development costs, and policy research of Enterprise Community Partners on best practices from other cities related to affordable housing pipeline management and site acquisition strategies and partnering with faith-based nonprofit organizations.

- **Section 7:** Concludes with strategy recommendations.

This report comes at a pivotal moment for San Francisco's housing future. The research and analysis provide critical insights on affordable housing pipeline management, site acquisition, and land use that inform how we maximize limited resources to advance production and equity goals.

Implementing the Housing Element and the City's Affordable Housing Goals

The Affordable Housing Sites Analysis and Strategies report helps implement policies and programs from the 2022 Housing Element Update by advancing the following policy goals:

- Policy 15 - Calls for expanding permanently affordable housing investments in Equity Geographies and Policy 19 - Calls for increasing permanently affordable housing units in Housing Opportunity Areas.

- Program 1.2 - Addresses Affordable Housing Production and, within that section, Program 1.2.4 calls for regularly tracking the pipeline of development sites and land banked for affordable housing development funded by OCII, MOHCD, and other relevant agencies. It also calls for developing strategies to ensure sufficient sites to accommodate affordable housing production relative to available funding over a rolling 4- to 8-year outlook and for meeting the goals to construct housing in Priority Equity Geographies and Well-resourced neighborhoods.

Relationship with Housing Element Rezoning and Low-Income Sites Rules

As part of the Housing Element, according to state rules, San Francisco had to assess its capacity to accommodate the 82,000 housing unit RHNA goals through a Sites Inventory. This analysis found a shortfall of capacity for 36,000 housing units, including 15% "No Net Loss" buffer described later in this section. Under state law, the City is required to rezone within three years of Housing Element adoption, by January 31, 2026 in San Francisco's case, to accommodate the shortfall of sites for

[2] Areas designated as "Highest Resource" and "High Resource" on the CTCAC/HCD Opportunity Area Maps (2025) Opportunity Area Map published by California Department of Housing and Community Development, developed by the California Tax Credit Allocation Committee (CTCAC). These areas were also called "Well-Resourced Neighborhoods" in the 2022 Housing Element.

housing affordable at different income levels. To address AFFH goals in State law and the Housing Element, San Francisco is focusing the required Family Zoning Plan rezoning in Housing Opportunity Areas in the center, west, and north of the city where restrictive zoning has limited new housing construction for decades.

RHNA goals are divided into different income levels: 1) very low and low income, 2) moderate income, and 3) above moderate incomes, to meet diverse housing needs. Jurisdictions must demonstrate they have sufficient capacity to accommodate different income levels. The requirement is **not** to zone sites specifically for affordable housing or limit the development of sites to only affordable housing projects. Because multifamily housing is more likely to be affordable to lower income residents than single family homes, the State requires multifamily zoning for the lower Income RHNA.

Under State rules, parcels identified to meet the lower-income RHNA must have zoning that allows a minimum of 16 units and a minimum density of at least 30 dwelling units per acre. The state's approach ensures that every jurisdiction has sufficient land that is zoned for multi-family housing at a minimum project size and density that is feasible for multifamily development. In addition, sites must have a reasonable likelihood or feasibility of being developed for housing. Meaning that an existing use on the site doesn't make it economically or practically impossible to build more housing. For example, a recently constructed, functioning hospital is unlikely to become housing in the near-term.

The State also requires "No Net Loss" of sites for lower income housing as mentioned above. If any site designated for lower income housing in the City's RHNA Sites Inventory is developed with fewer units of housing affordable at those income levels than indicated in the City's Sites Inventory, the City must identify additional sites to replace that capacity per the state's No Net Loss rules. For example, if Site A has been designated as suitable for low-income housing, but is developed with no on-site affordable housing, the city would need to identify and rezone an additional site to accommodate the affordable housing that was allocated to Site A. For this reason, San Francisco has included a state-recommended buffer of 15% above the 82,000-unit target in its Housing Element numerical goals. The buffer ensures the city maintains sufficient sites for affordable housing over time.

Practically speaking, the city's criteria for ideal affordable housing sites surpass the state's requirements. The City and County of San Francisco and its affordable housing developer partners seek sites that can accommodate at least 50 apartment homes and prefer 100 or more homes. This scale is more efficient to fund, finance, build, and operate. Given these practical considerations, the Affordable Housing Sites Analysis and Strategies **focuses on San Francisco-specific criteria** for analyzing the universe of potential development sites suitable for affordable housing.[3] Because state Housing Element law and local criteria for suitable sites for affordable housing can differ, the low-income sites designated within the rezoning for the Housing Element will overlap with sites meeting local 100% subsidized affordable housing criteria but will not be exactly the same.

3 See parcel suitability analysis section.

Section 2: Input from Affordable Housing Practitioners and Community

Community and Practitioner Input to the Housing Element and Implementation

The 2022 Housing Element included years of dialogue with residents, community organizations, and advocates to ensure that policies reflected citywide needs and neighborhood priorities. Following Housing Element adoption, the Activating Community Priorities process highlighted implementation priorities of residents and organizations in San Francisco's Equity Geographies. The AHSAS helps address community questions by looking at resources needed to build and grow the pipeline of housing throughout the city. Parallel to this work, San Francisco Planning convened and collaborated with the Community Equity Advisory Council. The Equity Council has surfaced specific community needs and recommended approaches to advance affordable housing and community resilience.

Affordable Housing Practitioner and Community Input for the AHSAS

To develop the strategies outlined in this report, AHSAS convened working sessions with affordable housing practitioners and other community-based organizations working on housing—many of whom had also been active participants in the AHLC. Two rounds of working sessions were held, first in June 2024 and again in August 2025. Practitioners provided ideas based on their experience and provided feedback on draft content. The AHSAS working groups built on working groups convened as part of the Affordable Housing Leadership Council (AHLC), which brought together affordable housing developers, advocates, financial experts, and community stakeholders to address affordable housing funding and cost lowering, and is described more in the next section.

Participating organizations included affordable housing developers, community-based nonprofits, advocacy groups, and intermediary agencies, bringing diverse expertise in housing development, policy, and community engagement. These organizations included:

- BRIDGE Housing
- Council of Community Housing Organizations (CCHO)
- Curtis Development
- Habitat for Humanity
- Housing Accelerator Fund (HAF)
- Interfaith Council
- John Stewart Company
- LISC (Local Initiatives Support Corporation)
- MEDA (Mission Economic Development Agency)
- Mercy Housing
- Mission Housing Development Corporation
- Related California Northern California Affordable
- Self-Help for the Elderly
- SFCLT (San Francisco Community Land Trust)
- SOMA Pilipinas
- TNDC (Tenderloin Neighborhood Development Corporation)
- YCD (Young Community Developers)

Affordable housing practitioners shared consistent themes around feasibility, funding, and strategic site selection. In June 2024, participants emphasized the importance of parcel suitability such as criteria size, interim uses, and leveraging public, nonprofit, and religious land, while highlighting challenges like rising costs and the need for predictable funding.

By August 2025, the focus was on insights and strategies, especially for religious and nonprofit developers, streamlined permitting, and policy tools to incentivize land acquisition, especially in Housing Opportunity Areas. In both sessions, practitioners stressed the importance of equity, partnerships, and innovative approaches to overcome systemic barriers. This feedback is integrated throughout the research topic areas and informed proposed strategies.

Feedback and Direction from Planning Commission

Questions about how San Francisco will fund and deliver affordable housing has been a consistent focus of the Planning Commission since the adoption of the 2022 Housing Element. On July 17, 2025, Planning Commissioners, advocates, and the public provided feedback on the Affordable Housing Sites Analysis and Strategies (AHSAS) in the context of the Family Zoning Plan. Public comment focused on the need for increased funding to move the affordable housing pipeline forward. Several Commissioners emphasized that while the Affordable Housing Sites Analysis and Strategies and Family Zoning Plan are critical steps, they must be paired with a clear and credible funding strategy. Suggestions ranged from exploring future local and regional housing bonds, to incentives such as transfer tax relief, strategic land acquisition, and policy reforms to reduce costs.

Commissioners and public commenters also focused on timing and accountability. Commissioners urged that the funding and tenant protection strategies be presented with concrete timelines. Some Commissioners and public commenters raised the need for strategic land banking to secure sites, particularly in areas that will be rezoned and that currently have little affordable housing. Overall, commissioners and members of the public recognized that State deadlines require swift action on rezoning, but stressed that funding and implementation must be developed in parallel to ensure that new capacity results in affordable homes and sustainable neighborhoods.

Section 3: Need for Affordable Housing Funding

Funding for affordable housing production and preservation, alongside efforts to reduce construction and operating costs, are the most critical factors for achieving San Francisco's housing targets. While the AHSAS analyzes the existing development pipeline and potential sites for future affordable housing development, financing and high costs are the bottlenecks to delivering affordable housing at the scale needed. The Affordable Housing Leadership Council (AHLC)—a group of experts convened by the City—directly addressed these issues in its Affordable Housing Leadership Council Report, published in February 2024. The report identified availability of low-cost funding and cost reduction as the most pressing challenges to meeting San Francisco's housing goals and made recommendations to expand resources and improve efficiency.

The AHSAS builds upon this work by focusing on the availability, suitability, and management of sites, while recognizing that funding and cost barriers are determinants of whether affordable housing can be built on potential sites.

Funding is the Central Challenge

Affordable housing developers must assemble local, state, and federal resources, yet federal and state programs remain inadequate relative to the scale of need. Over the past decade, San Francisco has doubled its rate of affordable housing production and preservation by substantially increasing local funding, producing or preserving more affordable homes than any other city in the region. Voter-approved General Obligation (GO) bonds ($310 million in 2015, $600 million in 2019, and $300 million in 2024), along with budget allocations, allowed the city to leverage state and federal dollars. Despite these gains, the city continues to fall short of its Regional Housing Needs Allocation (RHNA) targets. High construction costs—approaching $1 million per 2-bedroom unit—reduce the number of units each dollar can deliver and make projects less competitive for limited State funding. A dearth of funding, compounded by escalating development costs, limits the City's ability to accelerate pipeline production.

Recognizing these challenges, the AHLC issued its 2024 Affordable Housing Leadership Council report with recommendations to address funding, financing, and cost barriers.

- **Increasing federal, state, and regional funding** through advocacy, collaboration with other cities and state and national leaders, and strategic partnerships.
- **Expanding local funding and coordination capacity**, including maintaining or increasing local funding and improving alignment across City agencies and requirements.
- **Pursuing innovative and alternative approaches** such as public-private partnerships, philanthropy, and creative financing tools.

Recent Successes and Emerging Challenges

Since the AHLC published its recommendations, the city has accomplished several goals:

- **Local investments**: San Francisco voters approved the March 2024 General Obligation Bond and Proposition G in November 2024, establishing the Affordable Housing Opportunity Fund for rental subsidies to help extremely low-income renters afford housing.

- **Federal progress**: In 2025, federal legislation expanded the availability of private activity bonds and Low-Income Housing Tax Credits.

- **Production growth**: As of summer 2025, 31 affordable housing projects with more than 2,700 units are under construction or renovation.

At the same time, significant challenges persist:

- State programs such as the Multifamily Housing Program and Affordable Housing and Sustainable Communities regularly face potential cuts as the State grapples with declining revenue.

- A proposed regional affordable housing bond from the Bay Area Housing Finance Authority (BAHFA) did not advance in 2024, and supporting statewide ballot measures failed to pass.

Advancing Recommendations

To sustain momentum, San Francisco is pursuing several AHLC recommendations.

- Exploring use of ***tax-increment finance tools*** such as Enhanced Infrastructure Finance Districts (EIFDs) along with other potential local funding sources to generate consistent funding for affordable housing as called for in a Board of Supervisors resolution passed September 2025.

- ***Improving coordination of housing agencies,*** including MOHCD, OCII, and the Housing Authority, to maximize federal resources such as rental assistance.

- Supporting ***state and regional housing funding proposals***, including a potential 2026 state affordable housing bond.

Looking forward, the City may advance additional measures in the next 2–3 years, including: consideration of a new local bond by 2028, reducing local cost premiums tied to local regulatory requirements, supporting State reforms to lower insurance and other costs, and re-engaging in regional bond efforts.

Implications for AHSAS

The AHSAS provides critical analysis of sites, pipeline management, and acquisition strategies. Yet these strategies can only succeed if paired with the funding measures outlined above and cost-lowering . The city has sites and tools, but without sufficient financial resources and lower development costs, progress toward RHNA targets will remain out of reach. Advancing the Affordable Housing Leadership Council's recommendations in tandem with the site strategies described in this report is essential to increasing affordable housing production.

Section 4: Existing Practices and Pipeline

Managing San Francisco's affordable housing pipeline requires balancing multiple needs and priorities, complex regulatory requirements, and limited financial resources. The Mayor's Office of Housing and Community Development (MOHCD) functions as both funding aggregator and lender. MOHCD coordinates more than 25 different local sources, each with distinct requirements, and aligns them with state and federal resources. The current affordable housing pipeline maximizes housing production through both opportunistic and balanced practices.[4] MOHCD uses local funding to balance affordable housing production, preservation of existing buildings, and acquisition of new sites for development in a way that accounts for existing and anticipated funding sources.[5]

Affordable Housing Building Specs

The rising costs of affordable housing continue to make managing the affordable housing pipeline more challenging. As described in further detail in Section 6, unit costs average upwards of $1 million dollars for a two-bedroom unit. Construction-related hard costs are over 60% of total development costs, while land costs have remained less volatile at about 10 to 14 percent of total per unit costs. Projects are typically 6-8 stories and over 100 units to achieve economies of scale. Sites tend to be over 10,000 square feet for projects with smaller units such as 1 bedrooms and studios geared toward seniors and supportive housing for small households and upwards of 15,000 square feet to accommodate larger units for households with more than three members.

Coordinating Funding Sources for Affordable Housing

Managing funding is one of the most complex aspects of the affordable housing pipeline. In a typical new construction affordable building, there are five to seven funding sources. Local funds constitute about 1/3 of the funding needed. Once state, federal and other funding sources are secured, local city funds fill the gap between total cost and other secured funding sources.

As described in Section 2 of the AHLC report,[6] limited financial resources constrain construction and rehabilitation of pipeline projects and limit acquisition of new sites. Local revenue sources, such as General Obligation Bonds, provide some stability but require voter approval and are subject to fiscal and political conditions. Inclusionary housing fees, once a major resource, have declined sharply as private development has slowed, dropping from over $100 million in 2017 to a projected $3 million in 2025.

Federal allocations through the HOME and CDBG programs remain small, and state and federal Low-Income Housing Tax Credits (LIHTC), particularly the 9% LIHTC credits, are highly competitive.

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4 2024 - Affordable Housing: Funding and Feasibility Principles | Office of Resilience and Capital Planning (2024)

5 2024 - Affordable Housing: Funding and Feasibility Principles | Office of Resilience and Capital Planning (2024)

6 Affordable Housing Leadership Funding Recommendations Report (2024)

San Francisco typically secures only one or two of the more generous 9% LIHTC credit allocations annually. A more common funding scenario for a larger affordable housing project is with the 4% LIHTC credits paired with a limited supply of tax-exempt bonds. The 4% LIHTC fund has been oversubscribed statewide for the past five years, leading to a bottleneck; however, recent federal changes will increase the availability of the 4% LIHTC, though the value of the credits may be lower in the short term.

Within these constraints, MOHCD carefully matches projects to available sources and times its commitments to maximize competitiveness. Projects are tracked in a central pipeline allocation system that links anticipated funding availability with project readiness, allowing the City to plan around the state's funding calendar. The City manages its scarce funds through aggregating multiple sites into single Notices of Funding Availability, adjusting underwriting standards to match external scoring priorities, and requiring developers to pursue additional resources, among other ways, as needed by projects. At the same time, MOHCD works to fill critical funding gaps to keep projects viable and competitive for state awards.

A project enters the pipeline when the site is acquired. At this time, the City will either land bank the site or provide predevelopment funds and work with the development team to assemble construction funding and design, then permit, the site. The City's Affordable Housing Loan Committee reviews all requests for City funds. MOHCD requires developers to seek additional funding sources to reduce city costs and MOHCD provides gap funding to leverage competitive state funds. Typically, securing LIHTC and bond funding from the state is one of the last steps in the process of assembling the funding stack. The streamlining measures and permitting process changes have made a significant difference and have helped the city avoid costly delays from community opposition and lawsuits.

Affordable housing pipeline management must balance new opportunities with large, long-term commitments to major public housing and redevelopment sites. Projects such as the HOPE SF communities at Sunnydale, Hunters View, Alice Griffith, and Potrero Hill, as well as major Development Agreements like Treasure Island, require ongoing funding allocations. Managing these obligations involves navigating shifting priorities among the Mayor's Office, Board of Supervisors, state agencies, and federal programs.

Acquiring Sites and Land Banking for Affordable Housing

Sites enter the affordable housing pipeline through NOFA acquisitions, land dedications, development agreements, or as excess public lands. For example, over the past 10 years, the City has used targeted NOFAs to prioritize acquisitions in Housing Opportunity Areas [7] that align with the City's obligation to Affirmatively Further Fair Housing and its 2022 Housing Element[8] and state funding sources. Acquisitions in areas where multi-family and affordable housing have not been permitted helps address historical inequities created by exclusionary zoning and strengthens the competitiveness of projects in state funding competitions.

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7 CTCAC/HCD Opportunity Area Maps (2025) updated annually by the State.

8 2022 Housing Element

San Francisco integrates "land banking" into its affordable housing pipeline by acquiring sites for future development and holding them until they are ready for development. The City has acquired dozens of sites, either directly or through partnerships, that have been land banked.

Unlike other cities around the state and nationally, San Francisco generally retains ownership of the land and leases it to nonprofit developers and operators, to ensure permanent affordability and public control. This model distinguishes the city nationally, as most federal and state affordability covenants are time limited. By maintaining land ownership, San Francisco can guarantee affordability in perpetuity and step in when restrictions on older projects lapse.

The City's practice of *de facto* "land banking" carries significant costs. The cost of security and maintenance on land banked sites can range from $34,000 to $500,000 annually per site. With project timelines from acquisition to occupancy averaging five to seven years, these expenses can accumulate into the millions, creating difficult trade-offs in the allocation of finite and inadequate public resources for affordable housing.

Publicly Owned Land in the Pipeline

Publicly owned land can be an important, though limited, avenue for affordable housing development. Policies like the California Surplus Land Act and San Francisco's Proposition K Surplus Lands Ordinance establish procedures for making underutilized public properties available for housing. In practice, however, relatively few sites qualify as surplus because they continue to host active and critical public facilities. Agencies must balance their contribution to affordable housing with operational and financial need to sustain and improve public services and infrastructure.

The Joint Development Portfolio Program of the SFMTA supports affordable housing on some sites that it owns, while reserving others for essential transit revenue. Across the portfolio, affordable housing is accounted for. On some specific sites, however, the agency aims to cross subsidize construction and generate essential transit revenue through development of its assets.

The San Francisco Unified School District (SFUSD) also is exploring opportunities to integrate affordable housing onto more sites, while managing the dynamic changes in school enrollment and site needs. Projects such as Kapuso (SFMTA), Shirley Chisholm Village (SFUSD), and forthcoming Balboa Reservoir (San Francisco Public Utilities Commission) show the potential of this approach. Still, available supply remains modest and is distributed unevenly throughout the city.

Religious and Nonprofit-owned Land in the Pipeline

Partnerships with nonprofit and faith-based landowners can expand the pipeline and require significant alignment of visions and resources. Congregations have a long history of building affordable housing in San Francisco. Recent collaboration with the Interfaith Council, philanthropy, and City partners has renewed momentum.

State laws like SB 4, known as the "Yes in God's Backyard" bill, are encouraging religious and mission-driven land to develop affordable housing. San Francisco has participated in capacity-building programs with the San Francisco Interfaith Council and partner organizations such as the

San Francisco Foundation, the Local Initiatives Support Corporation (LISC), and the Housing Action Coalition (HAC) to support affordable housing development on religious and nonprofit owned land. While challenges such as aligning projects with organizational missions, navigating historic preservation issues, or addressing the lack of funding remain, the City has invested in technical and financial assistance to help nonprofit landowners explore development.

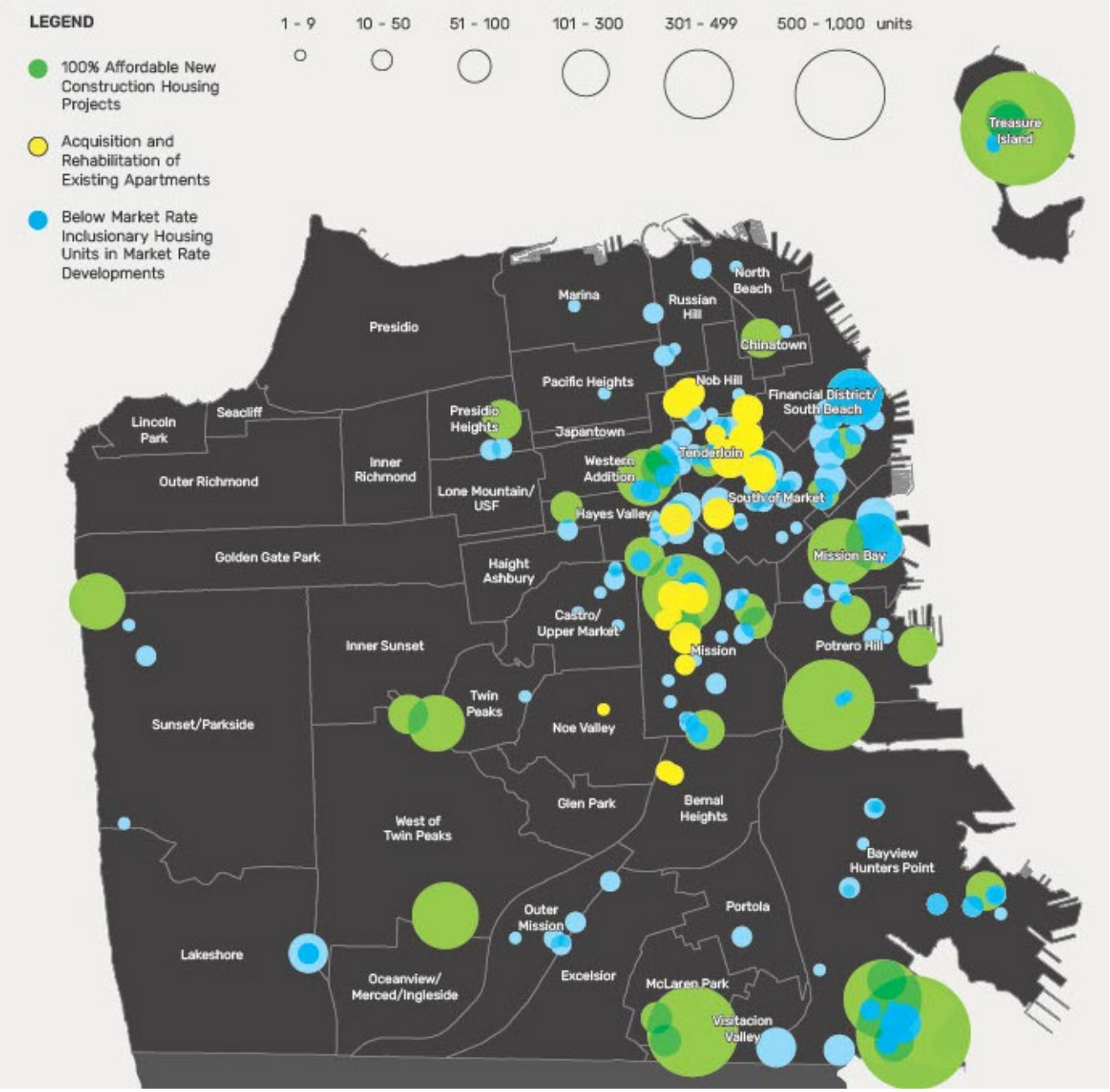
Overview of the Current Affordable Housing Pipeline

The "Affordable Housing Pipeline" consists of housing projects in various stages of development, from design to entitlement to under construction. The pipeline includes publicly funded 100% affordable housing projects (new construction and rehabilitation) and privately funded Inclusionary Housing Program (also known as the "Below-Market-Rate program) units. Many pipeline projects not yet in construction are not yet fully funded. Pipeline data is regularly updated and publicly available at DataSF and MOHCD's housing dashboard.[9]

The Affordable Housing Pipeline Overview (including the map shown below) illustrates San Francisco's affordable housing pipeline. The Overview was developed in response to recommendations from the Community Equity Advisory Council who wanted a transparent and accessible resource. It is intended to inform community planning efforts. Please note that the pipeline excludes longer-term projects in development agreements well as sites going through seismic retrofit as well as certain religious and nonprofit-owned redevelopment sites.

9 Regularly updated affordable housing pipeline data for large, multi-phase developments such as Treasure Island or Candlestick may only include affordable housing currently under development not all affordable housing planned over all phases of the development.

Figure 1. Map of Affordable Housing Pipeline (2024)



(Source: MOHCD Affordable Housing Pipeline Data Nov 2024)

Key Findings on the Affordable Housing Pipeline:

The Affordable Housing Pipeline includes a broad range of project types including preservation of existing housing, production of new 100% affordable developments, and BMR inclusionary units in different phases of development.

Pre-Development: There are over 12,600 units across more than 59 100% affordable developments that are currently in pre-construction stages, which include project design, approvals, assembling funding and financing from different sources, and permitting.

- **Production of new 100% affordable housing development** is divided into several categories with development sites obtained in various ways:

    - **Individual Sites Acquired in the Market**: **2,087 units across 13 projects** come from sites that were acquired individually on the private market, reflecting the importance of strategic acquisitions in supporting affordable housing production.

    - **Private Development Agreements**: **634 units across 5 projects** are being delivered through private development agreements, highlighting the role of negotiated land use approvals in securing affordable housing contributions within larger private developments. More development agreements could contribute to sites for 100% affordable housing developments in the future.

    - **HOPE SF: 1,415 units across 3 HOPE SF projects including Potrero and Sunnydale**, represent continued public investment in the transformation and revitalization of historically under-resourced Public Housing communities.

    - **Office of Community Investment and Infrastructure projects: 2,494 units across 4 redevelopment areas,** including Candlestick, Hunters Point Shipyard, Mission Bay, and Transbay, are a significant portion to the affordable housing pipeline and underscore the impact of large-scale, master-planned redevelopment areas.

    - **Large Development Agreements on formerly Publicly-owned Land**: **2,320 units across 2 developments** at Treasure Island and Balboa Reservoir. These projects exemplify long-term planning partnerships on former public land to achieve significant affordable housing.

    - **Individual Publicly-owned Sites: 471 units across 5 projects are planned on individual publicly owned parcels**, pointing to a more modest but ongoing role for site-specific public land development in the pipeline.

- **Rehabilitation Projects**, the acquisition, preservation, and rehabilitation of existing housing, include 21 buildings, which contribute 3,195 units, or 25% of the total units.

Figure 2. **Pre-Construction Affordable Housing Pipeline by Project Type (July 2025)**

Type	*Total Projects or Developments*	*Total Units*
Sites Acquired in the Market	13	2,087
Private Development Agreements	5	634
HOPE SF	3	1,415
OCII	7	2,494
Large Development Agreements on Formerly Publicly-owned Sites	5	2,320
Individual Publicly-owned Sites	5	471
Rehabilitation and Preservation	21	3,195
Total	**59**	**12,616**

(Source: MOHCD Affordable Housing Pipeline Data July 2025) Note: The data set includes projects in pre-construction phases of development and has been adapted from Affordable Housing Pipeline Data that will be published in July 2025. The list includes longer-term DAs and approximately 1,500 seismic retrofit units and 400 religious and non-profit owned site units.

In addition to the pipeline projects discussed above, there are additional affordable units in projects under construction and included as inclusionary units in privately funded market rate developments that are also in the pipeline. These affordable projects are summarized below.

- **Under Construction:** As of fall 2025, there are 30 projects under construction, including 13 new 100% affordable developments and 17 rehabilitation and preservation projects, totaling over 2,299 units.

- **Privately Funded BMR units:** There are over 124 market rate projects in the development pipeline that could provide 2,500 affordable units through the Inclusionary Housing Program (also known at the BMR program.) Many of these mixed-income projects are stalled by high interest rates or material and labor costs, which also hampers the development of 100% affordable housing.

- **Other long-term development agreements (DAs) will contribute significantly to affordable housing** through BMR units, land dedication and/or payment of fees, but are not included in the Affordable Housing Pipeline given their early stage of implementation. These DAs include Schlage Lock, Parkmerced, Stonestown and others. With DAs project sponsors typically have options on how to meet their BMR obligations and are only required to determine the method of fulfilling these obligations as the project is constructed. So, while these projects will significantly contribute both built units and funding for affordable housing per the terms of each DA, the exact mix of units, land, and funding cannot be projected at this time.

The geographic distribution of affordable housing is uneven and mirrors housing development patterns more generally including market rate housing. Planning analyzed the geographic distribution of the Affordable Housing Pipeline list from DataSF available as of February 2025.

The analysis found:

- Most of the new construction and preservation projects are in Supervisor Districts 5, 6, 9, and 10 while District 11 has no project in the pipeline. Districts 1, 2, 3, 4, 7, 8 have fewer than 4.

- Most affordable housing sites are concentrated outside of San Francisco's well-resourced Housing Opportunity Areas (HOAs), continuing a pattern of exclusion of new multi-family housing accessible to lower and moderate-income households from high-opportunity neighborhoods.

- This geographic distribution reflects similar development patterns for market-rate housing production. This is because (1) zoning that allows multifamily housing has supported the development of both affordable and market rate housing and new infrastructure investments have supported housing development in growing areas and (2) market-rate development directly produces affordable inclusionary units.

Figure 3. **Sites and Units in the Affordable Housing Pipeline by Type and Inclusion in Housing Opportunity Areas (February 2025)**

Pipeline Type	*Percentage of Total Affordable Units in Pipeline*	*Percent of Affordable Projects in the Housing Opportunity Area*	*Percentage of Units Projected for Housing Opportunity Area*
Rehabilitation and Preservation	11%	22%	12%
Production (100% subsidized developments)	64%	13%	16%
Inclusionary BMR Units in Market-rate Projects	25%	20%	10%

(Source: Affordable Housing Pipeline Data February 2025 Note: The data does not include some longer-term DAs or about 1,500 seismic retrofit units and 400 religious and non-profit owned site units listed in the Affordable Housing Overview.)

Figure 4. **Sites and Units in the Affordable Housing Pipeline by Supervisor District (100% New Construction and Preservation Projects)**

Supervisor District	*Percentage of Pipeline Projects*	*Percent of Total Units*
District 1	3%	1%
District 2	4%	2%
District 3	5%	7%
District 4	3%	4%
District 5	11%	10%
District 6	21%	26%
District 7	5%	9%
District 8	4%	3%
District 9	21%	15%
District 10	24%	24%
District 11	0%	0%

(Source: Affordable Housing Pipeline Data February 2025 Note: The data does not include some longer-term DAs or about 1,500 seismic retrofit units and 400 religious and non-profit owned site units listed in the Affordable Housing Overview.)

Additional Insights on the Current Affordable Housing Pipeline:

- **There is a significant funding gap to construct the current pipeline of sites**. The city is holding several years' worth of affordable housing sites ready for development or rehabilitation. The city, however, lacks the funding to bring these projects to fruition. Under current funding cycles and resources, the current pipeline could take more than ten years to build out at the current annual average of 650 units of new construction 100% affordable housing and 280 units of acquisition or rehabilitation.
- **Inclusionary Housing is a significant component of the affordable pipeline**: Inclusionary BMR units—affordable homes generated through requirements on market-rate developments—have contributed 25% of the affordable housing stock in the years leading up to the pandemic. About 250 inclusionary units per year have been constructed for the past five years. Given the economic conditions of this decade, inclusionary production has dropped. Today's current restrictive zoning in HOAs has limited both 100% affordable projects and opportunities for inclusionary BMR units.

The analysis of the current pipeline underscores core challenges facing San Francisco's housing strategy: the scale of the backlog, the pressing need for funding, and concentration of affordable housing in certain neighborhoods.

Section 5: Parcel Suitability Analysis

The Parcel Suitability Analysis analyzed San Francisco parcels' viability for affordable housing development based on key site characteristics and existing development on the site. Assessing parcel suitability helps the City take stock of potential capacity for affordable housing and where capacity is concentrated in different districts of the city.

This information can help guide site acquisition strategies citywide as well as in particular districts and the City may build on this tool with additional detail and functions. To assess parcel suitability, Planning established the analysis methodology in consultation with MOHCD and based on available data and relevant state and local policies that enable affordable housing. This section first presents an overview of the state and local policy considerations; then describes the methodology for the parcel suitability analysis; and then presents the parcel suitability analysis findings.

Policy Context for Affordable Housing Development

Various local, state, and federal policies combine to shape strategies for site acquisition and inform this Parcel Suitability Analysis. These policies and programs are considered when affordable development funding is distributed. They also affect the allowed density and feasibility of affordable housing.

Both the City and County of San Francisco and the State of California have established Executive Directives and legislation to support, prioritize, and streamline housing approvals and permits, especially for affordable housing. Locally, Mayor Ed Lee issued mayoral Executive Directive 13-01 in 2013, prioritizing faster housing project reviews. He further expanded that effort to speed the pace of housing production in 2017 with Executive Directive 17-02. Subsequently, Mayor London Breed and Mayor Daniel Lurie have continued with similar directives that would accelerate housing production.

Local initiatives that have helped shape today's affordable housing pipeline include:

- **Administrative Code Chapter 23A (Surplus Public Lands Ordinance, 2016)** – Requires surplus public sites to be prioritized for 100% affordable housing.

- **Proposition E (Planning Code Section 206.9)** – The 100% Affordable Housing and Educator Housing Streamlining Program facilitates the construction and development of affordable and educator housing.

- **Planning Code Section 315 (100% Affordable Housing Program)** – Provides streamlined approvals and incentives for 100% affordable projects.

At the state level, the legislature has introduced a series of housing bills to facilitate rapid housing review, approval, and permitting throughout California. San Francisco Planning Director Bulletin No. 5 summarizes ministerial approval processes for affordable and supportive housing through SB 35/SB 423, AB 2162, AB 2011/AB 2243, and SB 4 (described further below). The City must approve

the project if it meets all state program criteria and it satisfies the objective rules like zoning and design standards. Depending on the applicable bill, projects can be approved without needing environmental review, public hearings, or extra approvals from elected officials.

State laws that help shape the affordable housing pipeline and its management include:

- **SB 35**/ **SB 423** which establishes streamlined, ministerial approval for housing projects.
- **SB 4** which facilitates housing development on certain faith-based and nonprofit-owned lands.
- **AB 2011** which establishes by-right approvals and incentives for affordable housing along commercial corridors.
- **AB 2162** which establishes streamlined, ministerial approval for supportive housing projects.

California State Density Bonus Law (CA Gov Code Section 65915) is one of the most significant state tools because it grants:

- Projects that include affordable housing can access additional density and additional height (up to three stories for 100% affordable housing or up to a 50% bonus available to both 100% affordable and mixed income housing developments) as well as development waivers and concessions (code or objective standards flexibility).
- Projects can utilize that flexibility for any objective standard (ex. setbacks) that may be needed to provide the bonus units.

Because density bonus law is currently broadly utilized, state density bonus assumptions were incorporated into the AHSAS Parcel Analysis to assess site viability and capacity.

Together, these local and state laws expand the feasibility of building affordable housing on a range of sites while also reducing delays tied to discretionary review. Some of the eligibility criteria for projects to use various ministerial laws include locational considerations to avoid environmentally sensitive or unhealthy sites and avoid the demolition of existing residential uses, among other factors that vary by program. Since a ministerial decision involves only the use of objective standards, government agencies or approval bodies like boards or commissions cannot use subjective judgment in deciding whether to approve a project.

Affordable Housing Funding Considerations for Site Selection

At the federal level, programs like the Low-Income Housing Tax Credit (LIHTC) remain the single largest funding source for affordable housing development. The LIHTC program gives State and local LIHTC-allocating agencies annual funding and the ability to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. The California Tax Credit Allocation Committee (CTCAC) administers the federal and state LIHTC Programs. In addition, the California Debt Limit Allocation Committee (CDLAC) provides tax exempt

bonds and other financial resources while the California Department of Housing and Community Development (HCD) has various affordable housing funding programs that are typically dependent on annual funding from elected officials or voter-approved sources.

California has adopted Affirmatively Furthering Fair Housing (AFFH) laws and policies that shape the funding programs of the state housing agencies by including fair housing issues such as exclusion, segregation, and access to opportunity in funding program design. Other policy priorities including energy efficiency and reducing greenhouse gas emissions also influence state programs. These considerations in turn shape financing strategies and influence site characteristics for affordable developments. These goals also align with San Francisco's social equity commitments as well as important considerations for the quality of life for affordable housing residents including access to services, shopping, jobs, transportation, higher performing schools, and parks and recreation, among other important factors.

To align with AFFH, focusing on inclusion and expanding access, CTCAC has updated its 9% tax credit regulations by:

- Considering Opportunity Area Map designations (the state-designated map[10] that categorizes areas from "Low Resource" to "Highest Resource" based on numerous socioeconomic factors which are updated annually) to increase affordable housing in high-resource areas for families with children.

- Providing a basis boost and site amenity points for projects in High Resource and Highest Resource areas.

- Further incentivizing projects in these areas by adding a tiebreaker provision to the tax credit scoring process.

These changes are intended to affirmatively further fair housing and encourage increasing site acquisitions in High and Highest Resource areas to ensure funding competitiveness. In addition to considering site characteristics and funding programs for affordable housing, it is important to consider site suitability.

Methodology for Parcel Suitability Analysis

To analyze the availability and distribution of potential sites for affordable housing, the AHSAS includes a detailed parcel-level analysis to identify sites most suitable for future affordable housing development. Development criteria were informed by local, state, and federal guidelines and practices, as well as by the practical realities of financing, construction, and operation. Spatial and development program assumptions were applied through a Geographic Information System (GIS) to systematically filter, differentiate, and select sites with the strongest potential to support 100% affordable housing.

Some of the baseline site requirements included ensuring that potential development sites were at least 8,000 square feet or that contiguous suitable parcels added up to that minimum size. This

10 2025 CTCAC/HCD AFFH Mapping Tool NC

minimum size for individual and combined parcels is established in the local 100% Affordable Housing and Educator Housing Streamlining Program because this minimum lot size is conducive to accommodating multi-family housing at a scale competitive for funding and more efficient for construction and operations than smaller buildings on smaller parcels. Approved by San Francisco voters as Proposition E in November of 2019, and subsequently codified in Planning Code Section 206.9., Proposition E also allows affordable housing on sites currently zoned for public uses.

PARCEL SIZE

While 8,000 square feet is a minimum for affordable housing development, MOHCD and affordable housing developers prefer lot sizes of at least 10,000 square feet for households with smaller units. Sites of 15,000 square feet are preferred for households with larger units because this size can more easily accommodate a development with varying dwelling unit mixes and housing programs.

PARCEL DEVELOPMENT POTENTIAL

"Softness" for development was calculated for all parcels and then used as part of the selection criteria. Softness is generally defined as the level of development of a particular site's existing structures and use(s) relative to what could be built on the site under local and state laws. Sites that are currently built to a relatively low percentage of potential development capacity are more likely to be suitable and available for development. This analysis used a standard metric of 30% and lower being considered "soft" for new development. In other words, sites are considered "soft" if existing development was less than 30% of the potential gross floor area allowed. For example, if a site could accommodate an 8-story building but currently is built with a 2-story building, it would be considered underdeveloped or "soft" because it is only built to 25% of the allowed capacity.

PARCEL EXCLUSIONS

Given the variety of sites throughout San Francisco and complexities of development, the analysis applied "exclusions" to remove from consideration a range of parcels with various existing uses or characteristics that make development more challenging or unlikely. The exclusions included sites with:

- Existing housing (including rent-controlled housing)
- Entitled development projects that have pulled construction permits
- Large developments that have already been approved and entitled with specific affordable housing requirements
- Some public sites whose agencies are coordinating their own analyses for development (including SFMTA and SFUSD)
- Public universities and some private universities
- Parks and open spaces
- Extremely large sites such as golf courses
- Protected historic resources including resources individually listed under the California and National Registers as well as Articles 10 and 11 of the Planning Code[11]

11 Note that non-contributors in Article 10 and Category V (unrated) buildings in Article 11 were incorporated into the parcel analysis since those historic resources can generally utilize state ministerial laws.

This analysis did not search for sites that are actively for sale or vacant, since those are ever changing. Instead, the analysis took a more inclusive approach to identify the universe of sites or grouping of sites that are both “soft” and meet the mentioned criteria.

PARCEL LAND USE AND STATE DENSITY ASSUMPTIONS

Additionally, the analysis considered land use controls (notably height, bulk, and residential density) as they exist during the time of the analysis in combination with local and state laws (such as Prop E and State Density Bonus Law) that allow additional height and density for 100% affordable projects. The parcel suitability analysis did not incorporate potential heights, density, or flexible standards that will likely be part of the Family Zoning Plan, which is described in more detail below. Current affordable housing policies and programs provide some similar benefits for affordable housing to what the Family Zoning Plan could offer, however, the flexible zoning of the Family Zoning Plan, including increased heights and densities, will create even more development opportunities for affordable housing, as described below.

FAMILY ZONING PLAN AND SITE SUITABILITY ANALYSIS

To expand both overall housing production as well as affordable housing production throughout Housing Opportunity Areas, the Family Zoning Plan is proposing a set of policies to facilitate and accommodate this growth. The Family Zoning Plan continues to evolve but as currently drafted, the Plan includes increases to height limits and changes to density limits (from numeric to form-based density), especially on commercial and transit corridors.

Additionally, a major feature of the proposed Family Zoning Plan is the Housing Choice-SF Local Program, which provides for greater development flexibility. All Housing Choice-San Francisco housing projects, including affordable housing, will receive modified standards such as form-based density, additional height, flexibility on standards for rear yard or lot coverage, usable open space, and dwelling unit exposure, among others, and up to 15% of quantitative objective standards flexibility unless otherwise noted.

Projects that are comprised of 100% affordable housing will additionally receive more code flexibility on a variety of topics plus up to 20 additional feet in additional height. Where applicable, the AHSAS unit capacity is roughly approximating residential units that would be allowed inclusive of the State Density Bonus rules layered on existing zoning (pre-Family Zoning Plan). For example, most residential areas and commercial corridors in San Francisco currently have a height limit of 40 feet and with State Density Bonus could build to 73 feet or three additional stories. With the Family Zoning Plan 100% affordable project could qualify for additional height and other benefits. Because the Family Zoning Plan is still in development, the analysis did not use the proposed local program heights. Therefore, once the rezoning is codified, it will allow further residential capacity throughout these areas, including increasing heights and density and implementing flexible standards specifically for affordable housing that will increase the amount of affordable housing that is possible.

Parcel Suitability Analysis Findings

Across all districts, initial estimates from the draft analysis show that under today's zoning, there are 3,410 total viable sites, with a combined unit capacity of approximately 247,000 units.[12] This includes both stand-alone sites and those that become viable when combined with adjacent parcels. Stand-alone sites (soft, non-residential, and ≥8,000 sq. ft.) account for 1,204 sites and 60% of total capacity (148,231 units). Sites viable with aggregation of adjacent parcels add another 2,206 sites and 98,477 units, demonstrating that parcel assembly could unlock more housing potential. The complexity of aggregation, especially when sites have multiple owners, usually adds time and cost to a project and thus, standalone sites will generally continue to be more straightforward for development.

District 6 has the greatest capacity for affordable housing, likely due to significant number of larger sites without residential development. Districts 2, 3, and 9 also show strong capacity. Districts 8 and 1 have the lowest total capacity, suggesting fewer large parcels without existing residential uses or more constrained development environments.

Figure 4. **Draft Results from Parcel Suitability Analysis**

Supervisor Districts	*Number of Viable Stand-Alone Sites (soft, non-res, and at least 8000 sq. ft.)*	*Unit Capacity*	*Number of Sites Viable Only with Adjacent Sites (soft, non-res, and less than 8000 sq. ft.)*	*Unit Capacity*	*Total Number of Sites*	*Total Sum of Unit Capacity*
1	67	8,037	141	6,599	208	14,636
2	133	17,521	180	9,418	313	26,940
3	121	16,914	192	10,512	313	27,426
4	77	9,659	141	6,997	218	16,656
5	102	12,677	114	6,257	216	18,933
6	237	29,947	491	20,176	728	50,123
7	96	10,284	201	8,261	297	18,545
8	63	7,109	64	3,023	127	10,132
9	125	14,983	319	12,009	444	26,992
10	99	11,385	189	7,956	288	19,341
11	84	9,716	174	7,269	258	16,984
Total	1,204	148,231	2,206	98,477	3,410	246,708

These results underscore that land availability, in and of itself, is not the most significant limiting factor in expanding the city's affordable housing supply. It should be noted that this analysis did not assess the specific availability of any particular site for development or the desire of

12 Note that Planning is still refining and verifying the analysis in partnership with MOHCD and the results will likely continue to evolve.

owners to sell. As discussed more below in Section 6, individual property owners may have disincentives to sell for various reasons, such as complex ownership structures among family members or business partners, low property tax basis under Proposition 13, and satisfactory current revenue. So, while this analysis shows there are many viable, suitable sites for affordable housing development around the city, it will take time and effort to secure sites for development.

The proposed Family Zoning Plan, located primarily in the Housing Opportunity Areas, will expand zoned housing capacity for affordable housing beyond what current policies and programs provide. These changes could spur affordable housing production through mixed-income inclusionary projects, 100% affordable housing development, as well as more affordable "missing middle" housing. By opening multiple pathways to provide affordable housing, the proposed rezoning will provide greater likelihood that a range of affordable housing types will be produced.

Future updates to this analysis will additionally highlight the number of publicly owned sites, religious, and non-profit owned sites by district. Future analyses and findings will help inform more detailed and tailored approaches to district specific strategies for ensuring equitable distribution of new affordable projects. In addition, this inventory currently excludes properties with existing residential uses, which means there remains an additional, longer-term reservoir of sites that could further expand development opportunities as market conditions and policy tools evolve. For example, all sites with even just one unit, such as single-family homes, were excluded from this analysis, however, aggregations of these sites could offer future opportunities for affordable housing development, especially when merged with adjacent underutilized commercial sites. Zoning changes to allow more small and mid-size housing could also allow more affordable housing provided by the private sector as well as by nonprofit and public agencies.

Section 6: Financial and Policy Research

Building on the pipeline and site suitability analyses, the recommendations in this report are further shaped by extensive financial and policy research including case studies and field practices. The Department partnered with Century Urban on the financial analysis and with Enterprise Community Partners on policy research to develop strategies that strengthen pipeline management and support land acquisition. As noted in Section 1, in addition to consultant research, Planning staff convened focus groups in summer 2024 and 2025 with affordable housing developers and practitioners to gather input, surface policy questions, and identify practical strategies, providing additional important input.

This section provides a high-level overview of the research, analysis, and findings conducted by staff and partners, and orients readers to the detailed research memos that will be available on the project website. This section complements the findings and recommendations from the Affordable Housing Leadership Council Report, which covers funding and resources for the affordable housing pipeline more extensively. While there is some overlap, funding, financing, and construction costs are not the main purpose of the research covered here.

Financial Analysis

Planning and MOHCD worked with consultant Century Urban to analyze financial considerations for acquisition and development to inform the City's acquisitions strategies. Their work analyzed trends in the city's land costs and land costs relative to total development costs, land holding costs, the impact of different geographies and zoning on land values, and the effect of rezoning on land prices. Their work also included a review of the City's current investments in site acquisition and evaluation of tools to support affordable housing acquisition. The research summarized here informed the development of strategies in section 7.

LAND VALUE AND LAND COSTS DRIVERS

Land costs are driven by the amount that developers estimate they can afford to pay and the amount that property owners are willing to accept based on their current revenue and their expectations. Land in San Francisco remains among the most expensive in the country. Some factors that contribute to this include limited undeveloped land, proximity to jobs, transit, and amenities, and relatively high revenue from existing uses.

- **Construction costs, rents and sales prices, interest rates, target returns, and other economic and financial factors all play a significant role in determining how much developers are willing to pay for land.**
    - For market-rate developments, "residual land value" provides an estimate of the land cost that they can afford while still achieving a financial return after accounting for all other project costs. This method of land valuation fluctuates with economic conditions, construction costs, and other factors.

- Affordable housing developers compete with market rate developers for land, especially during periods of favorable conditions for market rate development. As a result, the cost of land is similar for affordable and market-rate housing.

- **If the value of the existing buildings or improvements is greater than a parcel's estimated value as a development site, the owner(s) may not be motivated to sell.**

  - Many landowners may have owned their properties for decades, benefitting from low property tax basis, and selling a site may trigger capital gains and/or transfer taxes. A sale must provide sufficient financial incentive to outweigh these factors.

  - Almost all potential development sites in San Francisco are infill parcels with existing buildings or underdeveloped lots, often used for parking or single-story commercial.

- **When economic conditions do not support development feasibility, developers may be unwilling/unable to pay substantial prices for land, while landowners may be unwilling to accept offers substantially below historical or recent land values**, resulting in fewer transactions overall.

LAND COST TRENDS AND DEVELOPMENT COSTS

An analysis of land transactions over the past decade shows relatively stable land prices which generally averaged $121,000 per unit for all projects; about $116,000 per unit for affordable projects, and $125,000 per unit for market rate projects. Starting in 2019, market rate land transactions declined, coinciding with increasing construction costs, decreasing rents, and higher interest rates.

- Average land cost since 2019 is approximately 5% less than the 10-year average, suggesting that despite reduced interest and ability of developers to buy land since 2020, landowners may be reluctant to sell at prices much below historical averages and may be slow to adjust expectations.

- Even in slow years when few or no properties transacted for market rate projects (reflecting challenging market conditions for such development), land sales for affordable housing projects continued to reflect costs at historical averages.

Construction costs have been a far more significant part of development costs than land costs over time. In recent years, construction costs and financing costs have skyrocketed.

- Total development costs per unit have generally increased since 2018, averaging approximately $1 million or more per unit (for a two-bedroom) since 2021.

- Construction costs rose by approximately 31% from Q1 of 2020, at the start of the COVID-19 pandemic, to Q2 of 2024. During this period, rental rates and sales prices did not keep pace with the rise in construction costs. Consequently, mixed-income projects became less economically

feasible.

- Land costs as a percentage of total development costs have remained relatively stable, ranging from 7% to 14% and averaging about 10% of total development costs.

POTENTIAL IMPACT OF EXEMPTION TO TRANSFER TAX

Century Urban also analyzed a potential transfer tax exemption for properties sold for affordable housing, a potential tool mentioned by affordable housing practitioners as a way to incentivize landowners to sell for affordable housing development. If enacted, a transfer tax exemption, discussed in the strategies section of this report (Section 7), would enhance the competitiveness of affordable housing developers in acquiring land.

IMPACT OF REZONING ON LAND VALUES

Century Urban analyzed the impact of rezoning on land values (on a per unit and per acre basis) revealing a complex relationship where rezoning appears to be just one factor affecting land values along with economic conditions and landowner expectations. The analysis also looked at a limited number of land purchases for affordable housing in areas with zoning that allows denser multifamily housing (form-based density) and compared with areas with more restrictive numeric density limits.

Analysis of the Eastern Neighborhoods rezoning (completed in 2009) shows that land value did not increase, and even dropped, on a *per unit* basis following a rezoning. Land transactions, however, appear heavily driven by economic conditions and landowner expectations.

- Before Eastern Neighborhoods rezoning (2009), the land costs in that area averaged $125,100 per unit and after the rezoning (2012), the land dropped to $113,700 per unit, a 9% decrease. Indicating that allowing more units per parcel reduces per unit land costs.

- Average land costs *per acre* increased by approximately 48% in real dollars potentially reflecting the added value generated by the increased residential density. However, it is the per unit costs that are pertinent to the question of how much affordable housing can be delivered for a certain amount of money, not the per acre land cost. The changing economic climate during this time likely also heavily influenced land prices independently of zoning as discussed below.

- Due to the Great Recession, there were no known residential land sales in Eastern Neighborhoods that took place between 2009, when the Area Plan was adopted, and 2012.

- Most land sales in the Eastern Neighborhoods occurred between 2015 and 2018, when the San Francisco was experiencing strong, tech-fueled economic growth that was increasing rents and home prices and driving housing development.

- Land sales volume declined again from 2019 onward as construction costs increased, rents dropped or stagnated, and inflation and interest rates increased.

- Exactions imposed by the city in the Eastern Neighborhoods, including inclusionary housing and impacts fees, may have also captured some of the value created by the rezoning, moderating the potential for land cost increases related to rezoning during this time. Exactions were also likely supported by strong economic conditions and lower development costs from 2012-2019. Value capture may be more limited under current economic conditions.

Century Urban reviewed the City's land acquisitions for development of affordable housing projects, comparing sites in recently rezoned areas with sites in areas that have not been recently rezoned as well as comparing areas based on state opportunity designations.

- **Comparison of recent land sales for affordable housing shows per-unit land costs can be similar across different zoning indicating that market expectations often outweigh zoning differences and land value is influenced by location, current and potential uses, and comparable sales**. Recent land sales for affordable housing in form-based density zoning districts in Eastern Neighborhoods and in districts with numeric density restrictions show comparable land prices per unit despite zoning differences. This data shows that sellers are often setting price expectations for land based on the size of the project (e.g. number of units) they know the buyer intends to build, not necessarily limited just by the zoning of the land.

- The analysis found that there are higher land values in high-resource state-designated Opportunity Areas, reflecting their desirability and access to resources in these areas.

ANALYSIS OF CITY LAND HOLDING COSTS

The city periodically acquires sites for future affordable housing development through direct land purchases or land dedications by developers to meet inclusionary housing requirements. It typically takes between five to seven years from site acquisition to construction start. During this period, the city is responsible for holding and maintenance costs. Site conditions can vary widely from vacant structures and parking lots to buildings with existing tenants. Some sites may accommodate interim uses while some sites may have significant deferred maintenance, affecting tenant retention and overall usability.

- **MOHCD currently manages five city-owned sites for future affordable housing that incur annual holding costs ranging from approximately $34,000 to $453,000.** Resulting in total annual costs currently averaging $837,000. Costs have exceeded $1 million in prior years.

- **Cumulative site holding costs can reach $168,000 to $2.5 million or more, depending on the hold period. Holding costs can add 1% to 17% to the total acquisition cost of a site and commensurately reduce available funding.** Site-specific factors—like existing tenants, capital needs, and interim revenue potential—should be carefully evaluated before site purchase as part of the overall site assessment.

SITE ACQUISITION AND MANAGEMENT FEEDBACK FROM AFFORDABLE HOUSING DEVELOPERS AND PRACTITIONERS

Practitioners across both focus group sessions identified persistent funding challenges as the primary barrier to affordable housing development. They stressed the critical importance of stable and predictable funding sources and asked the city to consider sequencing resources based on project needs to work on acquiring and preparing sites, so they are ready when funding becomes available for construction. They highlighted tools like Transfer Tax exemptions for affordable housing development sites and leasing options to help incentivize sales to affordable housing developers and address the specific challenges affordable developers face in transactions.

Expanding the applicability of the Welfare Property Tax Exemption available to nonprofit-managed 100% affordable housing occupied by low-income residents to sites acquired for affordable housing could lower land holding costs. Expansion of the welfare tax exemption would likely require changes at the state level.

Participants also stressed the value of acquiring sites early, balancing interim uses with holding costs, and removing cost barriers that impact affordable housing including permitting fees and street and infrastructure requirements. These highlights from the discussions and more insights generated from these sessions helped inform the recommended actions described in Section 7 of this report.

Policy Research

Enterprise Community Partners conducted targeted research to identify best practices that can inform San Francisco's affordable housing pipeline management and acquisition. The work examined current practices and how other cities manage and expand their affordable housing pipelines through site acquisition, coordination across public agencies, non-profit and faith-based partners, and the inclusion of smaller "missing middle" housing types to broaden affordability in residential and rezoning areas.

The research combined a literature review, program analysis, and policy recommendations with practitioner insights gathered through interviews with developers, consultants, City staff, and experts. The full memoranda, available on the project website, provide background information, policy analysis and real-world challenges and promising strategies through case studies from the field for further review. The following section highlights insights from the research that informed the recommendations in Section 7.

AFFORDABLE HOUSING PIPELINE MANAGEMENT: BALANCE FUNDING FOR CONSTRUCTION AND SITE ACQUISITION

Enterprise's research finds that a city's affordable housing pipeline must balance two parallel priorities: advancing existing projects to construction and strategically acquiring land for future developments. Both activities are essential for a healthy pipeline, yet they compete for the same limited pool of resources.

A well-managed affordable housing pipeline is central to sustaining production over time. For developers, predictability in process and funding is crucial as it allows for better planning, reduces delays, and ultimately controls costs. Strategic coordination across programs and agencies can help

San Francisco optimize limited resources, accelerate delivery, and ensure a steady flow of affordable housing projects citywide.

Research highlights key considerations and strategies for building an efficient, predictable affordable housing pipeline and offers high-level recommendations to guide City policies that support housing development.

- Given the constrained and limited funding context, cities can strengthen affordable housing production by establishing a local financing strategy that provides a consistent flow of funds for predevelopment and construction—phases that typically occur sequentially.

- A key best practice is consolidating Notices of Funding Availability (NOFAs) to streamline application processes, improve predictability for developers, and enable more strategic, coordinated investment across projects.

- Cities can strengthen affordable housing pipeline management by increasing the availability of local capital, operating, and housing services subsidies through reliable and recurring funding sources.

    - Leading practices include establishing dedicated local revenue streams such as general fund set-asides, voter-approved bonds, or targeted property tax measures to ensure ongoing support for affordable housing development.
    - Creating a dedicated funding stream for site acquisition, whether through a portion of existing permanent sources or future bond allocations, helps maintain project momentum and prevents gaps between acquisition and construction phases.

- Cities can strengthen affordable housing pipeline management by actively supporting coordination and simplification of state funding programs, including advocating for a unified or single-application process that reduces administrative burden and accelerates project timelines.

- Effective pipeline management also includes sustained advocacy for broader policy reforms, such as modernizing property tax structures, expanding state housing funding, and improving federal programs like the Low-Income Housing Tax Credit (LIHTC), to ensure long-term and scalable investment in affordable housing.

As described previously, new site acquisition should consider the number of sites and units in the existing pipeline and funding available. San Francisco's affordable housing pipeline functions as a de facto land bank managed by MOHCD and holding land in San Francisco incurs significant costs that can exceed $400,000 per site per year. Given the existing affordable housing pipeline awaiting funding, new sites should be acquired strategically; additionally, related holding costs that further limit funding for the construction of the pipeline should continue to be considered.

- Cities can strengthen their affordable housing pipeline by implementing targeted site acquisition programs that advance fair housing goals and expand affordable housing opportunities in high-resource areas. Effective programs establish clear selection criteria co-developed with community and industry partners and aligned with funding frameworks such as LIHTC scoring, ensuring transparency and competitiveness.

- Another emerging best practice is adapting local acquisition policies akin to Community Opportunity to Purchase Act (COPA) to include commercial or underutilized properties with potential for affordable housing redevelopment. This approach broadens the range of eligible sites, supports mixed-use and infill development, and helps cities proactively secure land for long-term affordability.

Public land ownership represents a significant asset for future affordable housing site acquisition but must be weighed with agencies' responsibilities and currently does not come free of costs due to the financial needs of various agencies as well as their charter requirements.

- The City could clarify and, where possible, amend land disposition processes across separately chartered agencies to better prioritize affordable housing while balancing each agency's mission.

- The City could continue transferring underutilized City-owned sites and encourage all enterprise and transit agencies to integrate affordable housing into surplus land use and capital planning efforts while also considering the financial needs of each agency.

ADVANCING AFFORDABLE HOUSING THROUGH FAITH-BASED AND NON-PROFIT PARTNERSHIPS

Faith-based Organizations (FBOs) and non-profits collectively own 280 acres of land in San Francisco, much of it in high-resource, transit-accessible areas. These sites offer a major opportunity to advance affordable housing, racial equity, and climate goals.

- Many FBOs often lack the specialized expertise needed for housing development; the city can expand access to training, technical assistance, and trusted partnerships to strengthen organizational readiness.

- Dedicated predevelopment funding, low-cost financing, and adaptable funding structures are essential to make joint development on FBO- and non-profit-owned sites viable.

- The City could promote use of existing tools—such as SB 4 and State Density Bonus Law—and align local zoning through the FZP and approvals to help FBOs and non-profits deliver affordable housing more efficiently.

APPROACHES TO UNLOCK "MISSING MIDDLE" HOUSING

Much of San Francisco's residential fabric, particularly in high-resource neighborhoods that are included in the Family Zoning Plan, consists of small lots and low-density zoning that have limited the production of affordable rental or ownership options for low- and moderate-income households. Even with zoning changes, these smaller lots do not meet the site requirements for publicly subsidized Low-income Housing Tax Credit (LIHTC) projects typically funded by MOHCD.

Research emphasizes that meeting the City's housing goals requires a dual-track strategy: continuing to advance larger multifamily projects with public subsidy such as LIHTC on sites larger than 8,000 square feet while simultaneously unlocking smaller sites for "missing middle" housing. Additionally, rents affordable at 100% AMI and up can be similar to rents in the unsubsidized rental

market, suggesting that additional housing typologies for small scale housing can provide more affordable housing options in residential neighborhoods.

The following land use, policy and design strategies support feasibility of "missing middle" affordable housing options across rezoned neighborhoods, can lower costs and increase feasibility:

- **Pre-Approved Designs:** Offer City-reviewed building designs tailored to common lot types and zoning to expedite permitting, reduce review time, and lower costs for developers while incorporating community input.

- **Simplified Land Assembly and Subdivision:** Streamline processes to combine or subdivide parcels, enabling larger multifamily projects and expanding "missing middle" homeownership options.

- **Single-Stair Buildings:** Allow taller, denser buildings with a single stairway to increase unit count and improve feasibility on small sites.

- **"Flats-for-Land" Partnerships (Antiparochi):** Enable landowners to partner with developers by contributing land in exchange for units or project shares, reducing land costs and improving affordability.

- **Elevator Reform:** Bringing down high costs down, reducing size requirements, and expanded labor access could unlock elevator installations in thousands of affordable housing projects.[13]

POLICY CONSIDERATIONS MOVING FORWARD

Across all three policy areas, the research reveals a consistent theme: **Funding predictability, partnerships for site acquisition, and innovation are the cornerstones of a stronger affordable housing pipeline management system**. A balanced pipeline requires reliable funding and interagency coordination. Unlocking land from public, faith-based, and nonprofit owners demands new partnership models and dedicated technical assistance. Finally, broadening housing options through rezoning and design reform offers a pathway to more inclusive, mixed-income neighborhoods.

13 Smith, S. (2024). Elevators. Center for Buildings, accessed via https://www.centerforbuilding.org/publication/elevators.

Section 7: Recommended Strategies

Based on the research detailed in Sections 3-6, the following five areas include strategies to sustainably manage and grow the affordable housing pipeline:

1. Managing the pipeline to advance housing development and site acquisition
2. Expanding the geography of affordable housing
3. Public sites and faith- and nonprofit-owned sites for affordable housing
4. Strategic market practices for site acquisition
5. Expanding opportunities for "missing middle" affordable housing types

Pipeline management, including site acquisition, is meant to complement recommendations on funding, financing, and cost reduction already published in the Affordable Housing Leadership Council Report.

Managing the pipeline to advance housing development and site acquisition

San Francisco's affordable housing production challenge is primarily due to limited funding and high construction costs. The city will need to focus resources on advancing existing commitments, such as HOPE SF and other pipeline projects, while scaling new site acquisitions to align with funding levels. To succeed, sites must be efficient for affordable housing development and competitive for State and Federal dollars, which align to Affirmatively Furthering Fair Housing Law. The city will need to continue to effectively manage the existing resources while making strategic acquisitions based on goals outlined in the 2022 Housing Element and evolving community needs.

RECOMMENDED STRATEGIES:

- **Increase funding and reduce development costs to produce more affordable housing more quickly.** Implement the 2022 Housing Element and the Affordable Housing Leadership Council recommendations and work with other cities, affordable housing developers, nonprofit and community organizations, and other allies.

    - Efforts to expand local affordable housing funding received a recent endorsement when the San Francisco Board of Supervisors passed a resolution requesting the Controller's Office, Office of Economic and Workforce Development (OEWD), and MOHCD to explore options for an Enhanced Infrastructure Financing District (EIFD) to fund Affordable Housing in Well-resourced areas along with other innovative financing options.

- **Issue NOFAs for site acquisition when funding is available** and coordinate local funding processes with state and federal funding application timelines. Continue to ensure sites for affordable housing are large enough and other necessary characteristics for efficient financing, development, and operation.

- **Scale acquisition of new sites for affordable housing development to available funding to build affordable housing** based on the number of projects already waiting for funding, costs for holding and developing sites, and in balance with goals for equitable geographic distribution of affordable housing around the city (more on geography below in the next section).

    - The total pipeline of units in development should approximately be equal to the average number of units built per year multiplied by the estimated number of years a project takes from predevelopment to construction after a site is acquired.

- **Factor City land holding costs and interim use costs into the land acquisition costs** to fully assess costs.

- **Explore land use policies to support interim use flexibility and lower costs for affordable housing** (ex. removing parking CUAs, vacant to vibrant OEWD programs for MOHCD sites, etc.)

- **Identify opportunities to lower land-holding costs** by having other City agencies, CBO, or other stewards manage the lease, provide capital, and oversee pre-construction site management.

Expanding the Geography of Affordable Housing

To meet Housing Element and Affirmatively Furthering Fair Housing goals, San Francisco must expand affordable housing in higher-resource neighborhoods—targeting 25% of new units—while sustaining investment in equity communities. New affordable housing has been built where multifamily housing has been allowed and the Family Zoning Plan can help expand where affordable housing can be developed. The city will continue to monitor the pipeline for geographic gaps.

RECOMMENDED STRATEGIES:

- **Acquire sites to reach the Housing Element's 25% minimum goal for affordable housing production in higher resource areas** while also adding sites in equity communities as available funding for site acquisition allows.

- **Pursue a flexible target of at least one affordable housing development in the development pipeline in all Supervisorial Districts at all times based on funding availability** as part of the effort to increase geographic equity and meet the Housing Element goal.

- **Track existing pipeline and portfolio for geographic gaps and target site acquisition strategies by District based on factors such as**: Existing affordable housing stock, affordable housing pipeline, concentrations of cost burden renters, and inventory of parcels suitable for affordable housing, including publicly-owned and nonprofit and religious owned land.

- **City agencies, nonprofit developers, policymakers, and community organizations can continue to identify development sites that advance the City's housing goals,** specifically sites that have lower than average per unit land costs, are competitive for funding and efficient for development, create housing in higher resource areas, or help stabilize equity communities.

- **Consider an Enhanced Infrastructure Financing District (EIFD**) in well-resourced areas to capture tax increment for affordable housing along with other affordable housing funding and financing tools as called for by the Board of Supervisors.

Public Sites and Faith- and Nonprofit-Owned Sites

Public and nonprofit-owned land is an opportunity to produce affordable housing while advancing the missions of public agencies, faith-based institutions, and community nonprofits. The City should continue to pursue partnerships, using tools like the Parcel Analysis to identify sites and align with agency and community priorities. Success will require coordination—linking landowners, affordable housing developers, and the city—to combine land, technical expertise, and subsidies. Initiatives like LISC's Faith and Housing program offer technical support which can make it easier for nonprofit and faith-based landowners to navigate development. Projects like the Shirley Chisholm Village on SFUSD land model innovative new partnerships.

RECOMMENDED STRATEGIES FOR PUBLIC LAND FOR AFFORDABLE HOUSING

- **Coordinate with local public agencies to facilitate land for affordable housing while balancing financial feasibility and revenue for public agencies** and considering site characteristics and agency needs.

    - Continue to analyze and identify publicly owned parcels on an ongoing basis that could be used for affordable housing and collaborate with City agencies that own these properties to explore viability of their use for affordable housing.
    - Collaborate with SFMTA on potential site development as part of their Joint Development Program.
    - Develop agency-specific approaches with SFUSD and others that have significant land holdings.
    - Provide information to support public land for housing including updates to existing webpage on public lands for affordable housing and/or case studies of recent affordable projects developed on public lands in the city within the past 10 years.

- **Identify and secure surplus land for affordable housing in coordination and collaboration with state and federal agencies.**

    - Share examples and showcase options for guidance and support to develop affordable housing on state and federally owned land.

RECOMMENDED STRATEGIES FOR RELIGIOUS AND NONPROFIT PROPERTY OWNED LAND FOR AFFORDABLE HOUSING

- **Map and identify priority religious and nonprofit affordable housing development sites per district based on parcel analysis** and coordinate findings with InterFaith Council (SFIC).

    - Advise congregations on historic status of potential development sites to understand implications and best practices for affordable housing development on historic sites.

- **Continue to provide information and technical assistance from City, philanthropic, and nonprofit partners to help religious and nonprofit property owners to assess options for property they own and shepherd affordable developments**. Differentiate approaches for assistance for different types of institutions and where they are in the process.
    - Consolidate resources to support religious and nonprofit partners to explore housing processes through on-line landing page/portal with existing City resources, new content, (primer on process streamlining options for adaptive re-use of properties) and materials from partners such as LISC's SB-4 Housing Accelerator Lab with SFIC.
    - Financially support a series of workshops for congregations on the housing development process to train a cohort of 1-3 FBOs per year (with a goal of 6-12 FBOs over four years).
    - Develop dedicated funding stream for predevelopment phase for religious and non-profit partners through philanthropic and other partners.

Strategic Market Practices for Site Acquisition

The city should continue to take both a strategic and opportunity-driven approach to site acquisition, working with affordable housing developers to control costs and avoid speculation. Incentives such as transfer tax relief and improved valuation methods can help motivate sales, while foreclosures, distressed assets, and below-market properties offer lower-cost options. To prevent price inflation, the city should not publish specific acquisition targets and instead maintain flexibility to pursue a range of sites in every Supervisorial District. Acquisition strategies must balance the goal of expanding affordable housing in Housing Opportunity Areas with the costs of holding and maintaining land. Land banking should be used selectively, in line with available funding and in partnership with nonprofit and philanthropic partners, in balance with advancing the 12,000+ affordable units already in the pipeline.

RECOMMENDED STRATEGIES

Implement programs and policies to strategically acquire and incentivize purchases in the market.

- **Consider a Transfer Tax Incentive for sales of private land for affordable housing** through an exemption for affordable housing project sites.

- **Acquire sites by working with the Housing Accelerator Fund, other CDFIs, Impact Investment Funds, and other philanthropic and nonprofit partners.**

- **Take advantage of lower cost site acquisition opportunities** such as property owners who would like to make sites available for affordable housing, properties in foreclosure or otherwise distressed, through partnerships with nonprofit and religious organizations or other property owners who are willing to offer lower prices.

- **Expand the use of the Community Opportunity to Purchase Act (COPA) to development sites for multifamily housing** as well as existing multifamily buildings for sale if COPA doesn't already apply.

- **Streamline parcel assembly and subdivision.** Coordinate with Public Works and other agencies on an expedited review process that allows for concurrent reviews and reduces iterative processes for the merger or subdivision of parcels. When applicable, encourage the use of ministerial reviews (ex. SB 1123 which expands AB 684) to streamline subdivisions.

- **Leverage public and private resources through joint venture partnerships that** maximize sources of capital. Public entities should continue joint developments with third-party mixed-income developers. For publicly-owned land, consider different approaches to satisfying California's Surplus Land Act by selling or ground leasing all or part of their surplus land to affordable housing developers.

Expanding opportunities for "missing middle" housing types

The City's affordable housing strategy must also consider "missing middle" housing—smaller buildings of 10–50 units—that fit the city's diverse parcel sizes but often lack the economies of scale that make larger projects more feasible. Encouraging small (2–20 units) and mid-size (21–49 units) buildings can expand options for low- and moderate-income households.

Policy changes such as single-stair reform, streamlined permitting, and pre-approved design standards could reduce costs and make these housing types more viable. The city should continue to advocate for code reforms and partner with private, nonprofit, philanthropic, and design sectors to support innovative approaches that grow this segment of the housing market.

RECOMMENDED STRATEGIES

- **Allow form-based density in residential districts** to accommodate as many residential units as possible within the buildable envelope (determined by height and setbacks).

- **Explore and encourage single-stair code reform** at the state and locally along with reforms to elevator requirements.

- **Develop scope for a program of pre-approved designs for small and mid-size housing developments** focused on feasibility and community needs.

- **Convene a working group to develop parameters and provide potential funding support to adapt and pilot the *Antiparochi* or "flats-for-land" model**, to facilitate landowners to exchange property for a share of new multifamily housing.

- **Promote innovation from the private sector, philanthropic sector, design sector, and non-profits for feasible small scale affordable development through RFPs**.

    - Issue a Request for Proposals (RFP) for private developers, philanthropic organizations, design firms, and nonprofit housing providers for *Antiparochi* or "flats-for-land" strategy and pre-approved site plans.

Conclusion

San Francisco faces an urgent challenge: building the affordable housing the city needs with limited financial resources in a costly environment. By aligning land acquisition with funding capacity, strengthening partnerships across public and nonprofit sectors, and pursuing innovative approaches to housing delivery, the City can better manage its pipeline and expand affordable housing opportunities across all neighborhoods. Moving forward, success will require discipline, creativity, and collaboration—but with these strategies in place, San Francisco can chart a more sustainable and equitable path for its affordable housing future.

San Francisco Planning

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September 22, 2025

Ms. Angela Calvillo, Clerk
Board of Supervisors
City and County of San Francisco
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: **Transmittal of Planning Department Case Number: 2021-005878GPA PCA MAP**
Housing Element 2022 Rezoning Initiatives – Family Zoning Plan
General Plan Amendments (Board File to be Assigned)

Planning Commission Recommendation: **Approval**

Dear Ms. Calvillo and Mayor Lurie:

On September 11, 2025, the Planning Commission conducted a duly noticed public hearing at a regularly scheduled meeting to consider the proposed General Plan, Planning Code Text and Map Amendments for the Family Zoning Plan, which implements the Housing Element 2022 Update. The Planning Code Text Amendment and Map Amendment were introduced by Mayor Lurie on June 26, 2025 with substitute legislation introduced on July 29, 2025. The Planning Commission initiated related General Plan Amendments on July 17, 2025 by Resolution No. 21784.

At the September 11, 2025 hearing the Planning Commission adopted a recommendation for approval for the General Plan and Map Amendments and a recommendation of approval with modifications for the Planning Code Text Amendments.

On September 18, 2025, the Planning Department transmitted Planning Commission Resolution Nos. R-21809 and R-21910 recommending approval and approval with modifications, respectively, of the Zoning Map and Planning Code Text Amendments. This transmittal is for the General Plan Amendments.

The Commission certified the Housing Element 2022 Update EIR on November 17, 2022 in motion 21206, and adopted CEQA findings, a Statement of Overriding Considerations, and a Mitigation, Monitoring and Reporting program (MMRP) for the Housing Element 2022 Update on December 15, 2022 in resolution 21220.

The Planning Department prepared an addendum to the Housing Element 2022 Update FEIR, which was published on September 3, 2025 and found that the proposed Family Zoning Plan, including the General Plan, Planning Code and Zoning Map amendments, would not create any new or substantially more severe significant impacts than those described in the FEIR.

As a part of the transmittal, the Planning Department is hereby requesting that the attached Draft Ordinance for the Family Zoning Plan General Plan Amendments be introduced on September 30, 2025 and that the required 30-day hold period be waived.

Please find attached documents relating to the actions of the Commission. If you have any questions or require further information, please do not hesitate to contact me.

Sincerely,

Aaron D. Starr
Manager of Legislative Affairs

cc: Audrey Williams Pearson, Deputy City Attorney
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ATTACHMENTS :

Planning Commission Resolution Nos. R-21808

Draft General Plan Amendments Ordinance

Proposed Revised Urban Design Element Map 04 – Urban Design Guidelines for the Height of Buildings

Planning Department Executive Summary

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PLANNING COMMISSION RESOLUTION NO. 21808

HEARING DATE: September 11, 2025

Project Name: Family Zoning Plan (Housing Element Rezoning Program)
Case Number: 2021-005878GPA MAP PCA
Initiated by: Planning Department Staff
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RESOLUTION ADOPTING AMENDMENTS TO THE SAN FRANCISCO GENERAL PLAN TO AMEND THE GENERAL PLAN, PURSUANT TO SECTION 340, INCLUDING AMENDMENTS TO URBAN DESIGN ELEMENT, THE TRANSPORTATION ELEMENT, THE COMMERCE AND INDUSTRY ELEMENT, THE BALBOA PARK STATION AREA PLAN, THE GLEN PARK COMMUNITY PLAN, THE MARKET & OCTAVIA AREA PLAN; NORTHEASTERN WATERFRONT PLAN, THE VAN NESS AVENUE AREA PLAN, THE WESTERN SHORELINE AREA PLAN, WESTERN SOMA AREA PLAN, THE DOWNTOWN AREA PLAN, AND THE LAND USE INDEX IN RELATION TO THE FAMILY ZONING PLAN, AND ADOPTING AMENDMENTS TO THE LAND USE PLAN OF THE CITY'S CERTIFIED LOCAL COASTAL PROGRAM, AND MAKING FINDINGS OF PUBLIC NECESSITY, CONVENIENCE, AND WELFARE, FINDINGS OF CONSISTENCY WITH THE GENERAL PLAN AND PLANNING CODE SECTION 101.1, AND FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, Section 4.105 of the Charter of the City and County of San Francisco mandates that the Planning Commission ("Commission") shall periodically recommend to the Board of Supervisors for approval or rejection proposed amendments to the General Plan in response to changing physical, social, economic, environmental, or legislative conditions; and

WHEREAS, the Commission, at a duly noticed public hearing on July 17, 2025 and in accordance with Planning Code Section 340(c), initiated the General Plan Amendments for the Urban Design Element, the Transportation Element, the Commerce and Industry Element, the Balboa Park Station Area Plan, the Market & Octavia Area Plan, the Glen Park Community Plan, the Northeastern Waterfront Plan, the Van Ness Avenue Area Plan, the Western Shoreline Area Plan, the Western SoMa Area Plan, the Downtown Area Plan, and the Land Use Index by Planning Commission Resolution No. 21784; and

WHEREAS, on June 24, 2025, Mayor Lurie, Supervisor Sauter, Supervisor Mahmood, and Supervisor Dorsey introduced an ordinance for Zoning Map Amendments (Board File No 250700) as a part of the

San Francisco Family Zoning Plan ("Family Zoning Plan" or "Plan"); and

WHEREAS, on June 24, 2025, Mayor Lurie introduced a companion ordinance amending the Planning Code (Board File No 250701); and

WHEREAS, the General Plan Amendments, the Zoning Map Amendments (Board File 250700), and the related Planning Code Amendments (Board File 250701) (collectively "the 2025 Actions" or "the Project") implement the San Francisco Family Zoning Plan ("Family Zoning Plan" or "Plan"); and

WHEREAS, on January 31, 2023, the Board of Supervisors adopted Ordinance No.010-23, that amended the San Francisco General Plan by establishing a completely revised Housing Element ("Housing Element 2022 Update"); and

WHEREAS, The Housing Element 2022 Update was prepared pursuant to Government Code 65583, which, in part, requires that the Housing Element provide: (a) an assessment of housing needs and an inventory of resources and constraints relevant to meeting these needs; (b) a statement of community's goals, quantified objectives, and policies relative to affirmatively furthering fair housing and to the maintenance, preservation, improvement, and development of housing; and (c) a program setting forth a schedule of actions during the planning period to achieve the goals and objectives of the housing element, including the need to revise certain General Plan objectives and policies and rezone portions of the City to increase development capacity to meet the City's housing needs; and

WHEREAS, the Housing Element 2022 Update was certified as compliant with state housing element law by the California Department of Housing and Community Development on February 1, 2023; and

WHEREAS, as required by the Housing Element 2022 Update, the Planning Department has embarked on a multi-year community-based planning effort to revise land use policies, the Planning Code, and Zoning Maps to assure sufficient and equitable development capacity to create a variety of housing types in areas of the City that are particularly well suited to accommodate additional housing; the rezoning effort is commonly referred to as the "San Francisco Family Zoning Plan" ("Family Zoning Plan"). As called for in the Housing Element 2022 Update, the rezoning focuses on the well-resourced neighborhoods of the western and northern portions of San Francisco (also referred to as Housing Opportunity Areas); and

WHEREAS, throughout this process, the San Francisco Family Zoning Plan has been developed based on robust public input, including, but not limited to, four public open houses; 11 presentations at the Planning Commission; seven focus groups targeting populations facing greater housing insecurity; 62 housing education workshops in District 1 and District 4; five field walks; multiple presentations at City Commissions and Board of Supervisors committee hearings; two webinars open to a general audience; four online surveys; over 90 meetings with individual neighborhood organizations and advocacy groups; a robust interactive web page presence; a mailed notice to all residents, business owners, and property owners within the rezoning area and within 300 feet of its boundary; and thousands of individual meetings, phone calls, and emails with stakeholders; and

WHEREAS, the Family Zoning Plan aims to expand housing affordability and diversity, including housing suitable for families, seniors, people with disabilities, essential workers, and low- and moderate-income

households; to create a more predictable process to approve and build housing; to ensure inspiring urban design and architecture; to support small businesses and neighborhood vitality; and to plan for infrastructure and services to serve growth; and

WHEREAS, the Family Zoning Plan is a required implementation action of the recently adopted Housing Element of the General Plan, is consistent with all of the policies in the Housing Element and broadly consistent with the current General Plan. However, in order to implement the policies and required rezoning actions described in the Housing Element, additional conforming amendments must be made to various objectives, policies, and maps of the following areas of the General Plan: the Urban Design Element, the Transportation Element, the Commerce and Industry Element, the Balboa Park Station Area Plan, the Glen Park Community Plan, the Market & Octavia Area Plan, the Van Ness Avenue Area Plan, the Northeastern Waterfront Plan, the Van Ness Avenue Area Plan, the Western Shoreline Area Plan, the Western SoMa Area Plan, the Downtown Plan, and the Land Use Index. Most of these amendments relate to the height, density, and scale of development in particular geographies to conform with the Housing Element generally and the proposed Family Zoning Plan specifically; and

WHEREAS, a draft ordinance, substantially in the form attached hereto as Exhibit 5b, and approved as to form by the City Attorney's office, would make a number of conforming amendments to various elements of the General Plan, including the Urban Design Element, the Transportation Element, the Commerce and Industry Element, the Balboa Park Station Area Plan, the Glen Park Community Plan, the Van Ness Avenue Area Plan, the Market & Octavia Area Plan, Northeastern Waterfront Plan, the Van Ness Avenue Area Plan, the Western Shoreline Area Plan, the Western SoMa Area Plan, the Downtown Plan, and Land Use Index. Height Maps in the Balboa Park Station Area Plan, the Glen Park Community Plan, the Market Octavia Area Plan, and the Northeastern Waterfront Plan, and the Bulk Map of the Urban Design Element are proposed for removal; and

WHEREAS, the proposed amendments to the Western Shoreline Area Plan constitute amendments to the Land Use Plan of the City's certified Local Coastal Program ("LCP"). On August 1, 2025 the Department issued a Notice of Availability of an LCP Amendment ("NOA") in accordance with California Code of Regulations, Title 14, Section 13515 requirements for public participation and agency coordination. The Department mailed the NOA to all neighborhood organizations that requested notice of hearings and applications in the Coastal Zone; individuals who have made a specific written request to be notified of hearings and applications pertaining to the Coastal Zone; local governments contiguous with the area that is the subject of the LCP Amendment; regional, state, and federal agencies that may have an interest in or may be affected by the proposed LCP Amendment; and the local library. The Department has completed a Consistency Analysis of the proposed LCP Amendment, attached hereto as Exhibit 7, in accordance with California Code of Regulations, Title 14, Sections 13511 and 13552; and

WHEREAS, the General Plan Amendments, together with proposed Zoning Map Amendments (Board File 250700) and Planning Code Amendments (Board File 250701), provide a comprehensive set of policies to implement key actions of the Housing Element 2022 Update; and

WHEREAS, collectively, the General Plan Amendments, the Zoning Map Amendments, and the Planning Code Amendments will affect approximately 92,000 of the approximately 150,000 parcels in the City where residential development is permitted; the Family Zoning Plan will allow increased density on all of those 92,000 parcels (approximately 60% of the 150,000 parcels), and increase the permitted heights on approximately 17% of parcels citywide; and

WHEREAS, the Commission certified the Housing Element 2022 Update EIR on November 17, 2022 in motion 21206, and adopted CEQA findings, a Statement of Overriding Considerations, and a Mitigation, Monitoring and Reporting program (MMRP) for the Housing Element 2022 Update on December 15, 2022 in resolution 21220. The Planning Department has prepared an addendum to the Housing Element 2022 Update FEIR, which was published on September 3, 2025 and found that the proposed Family Zoning Plan, including the General Plan, Planning Code and Zoning Map amendments, would not create any new or substantially more severe significant impacts than those described in the FEIR; and

WHEREAS, on September 11, 2025, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting to consider the proposed General Plan Amendments; and

WHEREAS, the Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of Department staff and other interested parties; and

WHEREAS, all pertinent documents may be found in the files of the Department, as the Custodian of Records, at 49 South Van Ness Avenue, Suite 1400, San Francisco; and

WHEREAS, the Commission has reviewed the proposed Ordinance; and

NOW, THEREFORE, BE IT RESOLVED, that pursuant to Planning Code Section 340(d), the Commission finds from the facts presented that the public necessity, convenience, and general welfare require the proposed General Plan Amendments for the following reasons:

1. The General Plan Amendments will create development capacity for more than 36,200 additional housing units by increasing realistic zoned capacity for housing and removing current constraints on new housing in the City's well-resourced neighborhoods, in satisfaction of Housing Element Action 7.1.1.

2. The General Plan Amendments will facilitate the increase in supply of housing units, helping to alleviate the City's housing shortage and affordability crisis. Allowing for greater density and building height encourages the construction of a wide range of housing typologies, thereby providing greater accessibility to housing for residents of all incomes, household types and needs throughout the city. The increased capacity will also generate more subsidized, permanently-affordable units through the City's inclusionary housing program and by increasing the geographic availability of sites zoned for the scale and type of buildings feasible for 100% affordable housing development.

3. The General Plan Amendments will advance the production of housing in state-designated Housing Opportunity Areas, where, over the past two decades, only about 10% of new housing units were built, even though they comprise more than 50% of the City's land. Building more residential units in these areas – which have higher incomes, good access to jobs, well-performing public schools, and low levels of environmental pollution – will create housing and economic opportunities for low- and moderate-income households.

4. The General Plan Amendments will enable increased housing production, which will generate more tax revenue and other public revenue to support public services and facilities. This increased revenue will ensure that vital infrastructure and services such as transit, schools, parks, and fire stations support healthy and complete communities, and that these facilities and services can increase in capacity as our population grows in addition to supporting reinvestment in existing facilities.

5. The General Plan Amendments will increase housing capacity in mixed-use and commercial areas and corridors, which will benefit local businesses by generating more customers and demand for their goods and services.

6. The General Plan Amendments will increase housing capacity along major transit corridors and near job, schools and services, which will reduce reliance on automobile trips and reduce greenhouse gas emissions, while providing additional ridership to support higher levels of transit service to benefit both existing and future residents, workers, and visitors.

BE IT FURTHER RESOLVED, that the Commission finds the General Plan Amendments, along with the Family Zoning Plan's proposed Planning Code and Zoning Map Amendments, (together "the Family Zoning Plan", or "the Project"), are, on balance, consistent with the General Plan as proposed for amendment and with the eight priority policies of Planning Code Section 101.1(b), as follows:

1. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses enhanced;

The Family Zoning Plan will enable increased density along commercial and transit corridors in western and northern San Francisco. The increased development capacity will both provide new commercial spaces for San Francisco businesses and provide additional residential density; the increased residential density, will, in turn, provide an enlarged client base and increased pedestrian activity for these businesses. The Family Zoning Plan contemplates measures that address the needs of small businesses, such as flexibility in establishing such businesses in new developments, incentives for new development to provide space and support for new and relocating small businesses, and zoning flexibility for Legacy Businesses to re-establish themselves in other locations if they must relocate.

2. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods;

The Family Zoning Plan aims to increase housing capacity within the rezoned areas, while maintaining key aspects of the neighborhoods that are key to San Francisco's character. New housing projects, while potentially larger than surrounding buildings, must meet objective design standards that require appropriate treatment of ground floor commercial and residential uses, building modulation and articulation, and attention to the public interface of new buildings with existing neighborhood context, among other requirements. The Family Zoning Plan maintains all current Planning Code process that strictly limits the ability to demolish existing multi-family housing units and protects existing tenants. Companion legislation to the Family Zoning Plan proposes enhancing protections for existing tenants by establishing similar policies required by State law. As noted above, the Family Zoning Plan also looks to support local businesses by both providing new opportunities in new development and facilitating relocation of Legacy Businesses. The Plan will not affect current policies and review processes for listed Historic Buildings, including properties that are listed in Article 10 and Article 11 of the Planning Code. The Family Zoning Plan includes a flexible housing entitlement program (referred to as "the Housing Choice-San Francisco Program"), whereby housing developers can obtain reductions of certain Planning Code and design standards requirements as a means to encourage housing development. Projects that include demolition of properties listed in the National Register of Historic Places, the California Register of Historic Resources, or Articles 10 or 11 of the Planning Code would not be eligible for this program. Similarly, projects that involve additions or major modifications to Historic Buildings would be reviewed for compliance with the Commission's adopted Preservation Design Standards, helping to assure the ongoing historic integrity of Historic Buildings.

3. That the City's supply of affordable housing be preserved and enhanced;

The Family Housing Zoning Plan is part of the City's effort to produce 82,000 housing units, including 47,000 for lower- and moderate-income households. Increasing housing production overall will lead to an increase of subsidized affordable units, which are supported by the City's inclusionary housing requirements. Additionally, the Family Zoning Plan will increase the variety and types of housing available in these neighborhoods by providing increased development capacity in different neighborhood contexts. Housing stock in the Housing Opportunity Area is predominantly single-family homes, which are expensive and provide little opportunity for households looking for more affordable or smaller units. A greater diversity of new housing stock, including apartments and condominiums in multi-family buildings, will provide more housing opportunities for households of all income levels and sizes in High Opportunity neighborhoods. In addition to providing opportunity for larger multi-family buildings on commercial and transit corridors, the Family Zoning Plan will encourage the development of smaller scale additional of housing, including fourplexes, accessory dwelling units (ADUs), townhomes, and small- mid-sized multi-family buildings in residential areas; all of these housing types tend to be more affordable to a greater range of households than single-family homes.

4. That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking;

The Family Zoning Plan will not impede transit service or overburden streets and neighborhood parking. The Family Zoning Plan would increase housing capacity along existing transit corridors, thereby decreasing reliance on automobile ownership, vehicle trips, and parking. The anticipated increases in

housing density and height are concentrated on high-capacity transit lines. The Family Zoning Plan would reduce maximum allowable off-street parking to reduce vehicle trips generated at future projects. This will also encourage non-auto travel, such as by transit, in compliance with regional Transit Oriented Communities Policy adopted by the Metropolitan Transportation Commission. The rezoning would also restrict new curb cuts for off-street parking and loading on certain core pedestrian-oriented commercial blocks in order to limit conflicts with pedestrian activity and to maintain vibrancy of commercial districts.

5. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced;

The Family Housing Zoning Plan increases development capacity primarily in residential, neighborhood-commercial, and mixed residential-commercial areas that generally do not include significant amounts of existing industrial uses; no industrial (PDR) districts are proposed for rezoning in the Family Zoning Plan. The Family Zoning Plan does not increase capacity for office development; instead, it increases housing and ancillary small scale ground floor commercial spaces for small businesses and institutions to serve future residents. The Family Zoning Plan would increase housing capacity along existing commercial corridors, which will generate more consumer demand – and therefore more opportunity for service sector employment – at the businesses located therein. Furthermore, it will advance measures to address impacts to existing businesses from new development.

6. That the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake;

New construction taking place as a result of the Family Zoning Plan would be required to comply with all current structural and seismic requirements under the San Francisco Building Code.

7. That the landmarks and historic buildings be preserved;

The Family Zoning Plan would maintain current policies for listed Historic Buildings, including properties that are listed in Article 10 or Article 11 of the Planning Code, the California Register, or National Register. As noted above, projects that include demolition of properties listed in the National Register of Historic Places, the California Register of Historic Resources, Article 10 of the Planning Code or Article 11 of the Planning Code would not be eligible for the Housing Choice-San Francisco Program. Similarly, projects that involve additions to Historic Buildings would be reviewed against the Commission's adopted Preservation Design Standards.

8. That our parks and open space and their access to sunlight and vistas be protected from development;

San Francisco policies and procedures regarding shadows on public parks would not be affected by the Family Housing Zoning Plan.

BE IT FURTHER RESOLVED, that the Commission finds that the Family Zoning Plan, including the General Plan, Planning Code and Zoning Map Amendments are in conformity with the General Plan as it is proposed to be amended. The General Plan Amendments will articulate and implement many of

the Goals, Objectives, and Policies described in the General Plan. The Family Zoning Plan is consistent with the following Objectives and Policies of the General Plan, as it is proposed to be amended, as follows:

HOUSING ELEMENT

OBJECTIVE 1.A
ENSURE HOUSING STABILITY AND HEALTHY HOMES

The Project would advance the City's goal of generating 82,000 housing units over the coming years, including 47,000 for lower- and moderate-income residents.

OBJECTIVE 3.B
CREATE A SENSE OF BELONGING FOR ALL COMMUNITIES OF COLOR WITHIN WELL-RESOURCED NEIGHBORHOODS THROUGH EXPANDED HOUSING CHOICE

POLICY 25
Reduce governmental constraints on development in Well-resourced Neighborhoods to enable small and mid-rise multi-family buildings providing improved housing choice and affordability.

The General Plan Amendments and the Family Housing Zoning Plan would increase housing development capacity, relax certain development standards, and generally provide increased housing development opportunities where they currently do not exist. For example, small-scale and mid-rise multi-family housing would be permitted in neighborhoods that previously only allowed single-family homes. Mid-rise buildings would be permitted on commercial and transit corridors.

OBJECTIVE 4.B
EXPAND SMALL AND MID-RISE MULTI-FAMILY HOUSING PRODUCTION TO SERVE OUR WORKFORCE, PRIORITIZING MIDDLE-INCOME HOUSEHOLDS

POLICY 20
Increase mid-rise and small multi-family housing types by adopting zoning changes or density bonus programs in Well-resourced Neighborhoods and adjacent lower-density areas near transit, including along SFMTA Rapid Network and other transit.

POLICY 26
Streamline and simplify permit processes to provide more equitable access to the application process, improve certainty of outcomes, and ensure meeting State- and local-required timelines, especially for 100% affordable housing and shelter projects.

POLICY 31
Facilitate small and mid-rise multi-family buildings that private development can deliver to serve middle-income households without deed restriction, including through adding units in lower density areas or by adding Accessory Dwelling Units (ADUs).

The Family Housing Zoning Plan increases capacity for housing development across a wide range of residential, neighborhood-commercial, and mixed residential-commercial neighborhoods across the City. It creates a local streamlined approval process for housing projects (the Housing Choice-San Francisco

Program) that features objective review and approval, without need for discretionary public hearings, thereby providing a simple permitting process for housing development, in addition to a wide range of code flexibility. The Housing Choice-San Francisco program also provides for additional capacity and code flexibility for 100% affordable housing projects.

OBJECTIVE 4.C
EXPAND AND DIVERSIFY HOUSING TYPES FOR ALL

POLICY 32

Promote and facilitate aging in place for seniors and multi-generational living that supports extended families and communal households.

POLICY 33
Prevent the outmigration of families with children and support the needs of families to grow.

By increasing potential development capacity in various contexts, the Family Zoning Plan enables the creation of a wide variety of housing typologies including those for various populations. By increasing the availability of housing of all types, it will encourage housing for seniors, multi-generational and communal households, and for families with children. By providing for new construction of multi-family housing, more appropriate housing for seniors, such as elevator buildings and smaller units, would be enabled in neighborhoods where existing housing stock is limited to larger single-family homes.

OBJECTIVE 5.A
CONNECT PEOPLE TO JOBS AND THEIR NEIGHBORHOOD WITH NUMEROUS, EQUITABLE, AND HEALTHY TRANSPORTATION AND MOBILITY OPTIONS

POLICY 37
Facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities.

POLICY 38
Ensure transportation investments create equitable access to transit and are planned in parallel with increase in housing capacity to advance well-connected neighborhoods consistent with the City's Connect SF vision, and encourage sustainable trips in new housing.

The Family Zoning Plan would increase capacity for new housing in mixed use districts and commercial and transit corridors in San Francisco's Well-Resourced Neighborhoods, allowing for improved access to daily goods and services, public transportation and jobs.

TRANSPORTATION ELEMENT

OBJECTIVE 2
USE THE TRANSPORTATION SYSTEM AS A MEANS FOR GUIDING DEVELOPMENT AND IMPROVING THE ENVIRONMENT

POLICY 2.1
Use rapid transit and other transportation improvements in the city and region as the catalyst for desirable development, and coordinate new facilities with public and private development.

POLICY 2.2
Reduce pollution, noise and energy consumption

OBJECTIVE 11
ESTABLISH PUBLIC TRANSIT AS THE PRIMARY MODE OF TRANSPORTATION IN SAN FRANCISCO AND AS A MEANS THROUGH WHICH TO GUIDE FUTURE DEVELOPMENT AND IMPROVE REGIONAL MOBILITY AND AIR QUALITY

The Family Zoning Plan would increase housing development capacity along major transit corridors and near major transit stations and nodes. The geography and intensity of housing capacity in the Family Zoning Plan is heavily guided by the public transit system and proximity to commercial and educational centers to improve access and mobility by transit, walking and other non-automobile modes and limit VMT growth from new development.

URBAN DESIGN ELEMENT

OBJECTIVE 1
EMPHASIS OF THE CHARACTERISTIC PATTERN WHICH GIVES TO THE CITY AND ITS NEIGHBORHOODS AN IMAGE, A SENSE OF PURPOSE, AND A MEANS OF ORIENTATION

POLICY 1.1

Recognize and protect major views in the city, with particular attention to those of open space and water

The Family Zoning Plan tailors heights to emphasize characteristic elements of the city pattern, with a predominantly low and mid-rise plan of generally eight stories or less that recognizes topography and maintain key characteristic vistas from public vantage points, locating taller heights at key locations of transit nodes and major intersections for citywide orientation, and locating higher density adjacent to mass transit. The scale of allowable mid-rise buildings is generally aligned with factors such as the width of the street and the significance of adjacent transit and transportation. Buildings of 160 feet and taller will be allowed at key locations and intersections that mark transit nodes and major corridors as envisioned by the Urban Design Element. Large sites will be configured to ensure a small, walkable block pattern that is characteristic of the city fabric. Projects must adhere to Objective Design Standards, including Preservation Design Standards, which emphasize breaking down larger buildings into a finer scale of building patterns characteristic of the city through building modulation and articulation standards.

OBJECTIVE 2
CONSERVATION OF RESOURCES WHICH PROVIDE A SENSE OF NATURE, CONTINUITY WITH THE PAST, AND FREEDOM FROM OVERCROWDING

POLICY 2.4

Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with the past

The HC-SF Program will not be available to projects that propose to demolish landmarks listed in Article 10 of the Planning Code, contributory structures to Historic Districts in either Article 10 and Article 11, or properties listed in either the California Register of Historic Resources or National Register of Historic Places. All projects proposing alterations or additions to historic buildings are required to comply with the adopted Preservation Design Standards. The Project will increase capacity for new development while ensuring that buildings and sites identified as cultural resources will be subject to requirements intended to preserve character defining features.

POLICY 2.7

Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character.

OBJECTIVE 3

MODERATION OF MAJOR NEW DEVELOPMENT TO COMPLEMENT THE CITY PATTERN, THE RESOURCES TO BE CONSERVED, AND THE NEIGHBORHOOD ENVIRONMENT

POLICY 3.5

Relate the height of buildings to important attributes of the city pattern and to the height and expression of existing development

POLICY 3.6

Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.

The Family Zoning Plan tailors heights to emphasize characteristic elements of the city pattern, with a predominantly low and mid-rise plan of generally 8 stories or less that recognizes topography and maintains key characteristic vistas from public vantage points. The Family Zoning Plan locates taller heights at key locations of transit nodes and major intersections for citywide orientation and locates higher densities adjacent to mass transit. The scale of allowable mid-rise buildings is generally aligned with factors such as the width of the street and the significance of adjacent transit and transportation. Buildings of 160 feet and taller will be allowed at key locations and intersections that mark transit nodes and major corridors as envisioned by the Urban Design Element. Large sites will be configured to ensure a small, walkable block pattern that is characteristic of the city fabric. Projects must adhere to objective Citywide Design Standards, including Preservation Design Standards, which emphasize breaking down larger buildings into a finer scale characteristic of the city pattern through building modulation and articulation standards. The Family Zoning Plan and the Citywide Design Standards also contain bulk limits for taller buildings to avoid overly bulky massing, as well as stepbacks for the upper floors of larger buildings adjacent to lower scale housing.

The Family Zoning Plan respects and accounts for existing neighborhood character while increasing allowable heights; areas that are presently comprised predominantly of small residential parcels off of the

main commercial and transit corridors would generally remain at a height limit of 40 feet, with limited allowance for six stories on corners and larger lots.

COMMERCE AND INDUSTRY ELEMENT

OBJECTIVE 6
MAINTAIN AND STRENGTHEN VIABLE NEIGHBORHOOD COMMERCIAL AREAS EASILY ACCESSIBLE TO CITY RESIDENTS

POLICY 6.1
Ensure and encourage the retention and provision of neighborhood-serving goods and services in the city's neighborhood commercial districts, while recognizing and encouraging diversity among the districts.

POLICY 6.2
Promote economically vital neighborhood commercial districts which foster small business enterprises and entrepreneurship, and which are responsive to economic and technological innovation in the marketplace and society.

The Family Zoning Plan concentrates density and new residences along commercial corridors, which will benefit local businesses by generating more customers and demand for their goods and services. The proposed zoning maintains Neighborhood Commercial zoning and encourages ground floor commercial uses, including through the creation of a new Residential Transit Oriented – Commercial zoning district, to allow more flexibility to provide ground floor commercial space for neighborhood-serving businesses. The Housing Choice program also includes incentives to support small businesses. While a modest number of small businesses may be directly affected over time by proposed housing development on sites that they operate, on the whole the Family Zoning Plan will increase the viability and vitality of neighborhood commercial businesses and districts overall.

POLICY 6.7
Promote high quality urban design on commercial streets.

The Family Zoning Plan will advance Citywide Design Standards that create clear expectations for new construction, including high quality pedestrian-oriented storefronts and active ground floors that encourage pedestrian and commercial activity, as well as fine-grained well-designed buildings overall.

POLICY 6.8
Preserve historically and/or architecturally important buildings or groups of buildings in neighborhood commercial districts.

The Family Zoning Plan will increase capacity for new development while ensuring that buildings and sites listed as cultural resources will be subject to requirements intended to preserve cultural heritage.

BALBOA PARK STATION AREA PLAN

OBJECTIVE 1.1
Integrate the diverse uses in the plan area around the commercial spine and transit node.

POLICY 1.1.1

Strengthen the link between transportation and land use.

The Family Zoning Plan will increase allowed heights along Ocean Avenue and around the BART station within the Area Plan's boundaries thereby encouraging additional housing development and the increased diversification of the land uses along these important commercial spine and transit nodes.

OBJECTIVE 1.2

STRENGTHEN THE OCEAN AVENUE NEIGHBORHOOD COMMERCIAL DISTRICT.

POLICY 1.2.2

Encourage mixed-use residential and commercial infill within the commercial district.

Permitted heights will be increased along the Ocean Avenue commercial district thereby strengthening the commercial district with heights appropriate to the scale and importance of the street and providing housing for additional residents, who will in turn provide an additional customer base for the commercial businesses.

OBJECTIVE 4.6

ENHANCE AND PRESERVE THE EXISTING HOUSING STOCK

POLICY 4.6.2

Discourage dwelling unit mergers.

The Family Zoning Plan reinforces existing policies that discourage unit mergers by introducing new provisions that strengthen the Planning Commission's stance against the loss of residential flats.

GLEN PARK COMMUNITY PLAN

OBJECTIVE 2

ENSURE THE COMPATIBILITY OF NEW DEVELOPMENT WITH THE FORM AND CHARACTER OF GLEN PARK

POLICY 2.2

Consider new housing and commercial opportunities in appropriately scaled infill development that supports the commercial area.

The Family Zoning Plan increases allowed heights in the Glen Park Plan Area appropriate for its location next to major regional transit facilities including the Glen Park BART Station and the MUNI J-Church Metro line. Developments using the local program will be required to meet the Citywide Design Standards, which include design standards addressing buildings' bulk, articulation and relationship to adjacent smaller buildings. The existing height limits in the commercial area are so low as to suppress all possible new housing and infill development, and are not appropriate for the location adjacent to a BART and Muni Metro station, and so are not aligned with this policy.

MARKET OCTAVIA AREA PLAN

OBJECTIVE 1.2

ENCOURAGE URBAN FORM THAT REINFORCES THE PLAN AREA'S UNIQUE PLACE IN THE CITY'S LARGER URBAN FORM AND STRENGTHENS ITS PHYSICAL FABRIC AND CHARACTER.

POLICY 1.2.2

Maximize housing opportunities and encourage high-quality commercial spaces on the ground floor.

POLICY 1.2.7

Encourage new mixed-use infill on Market Street with a scale and stature appropriate for the varying conditions along its length.

The Family Zoning Plan would increase height along Market Street within the Market and Octavia Area Plan's boundaries as well as in the "Hub" area near Market and Van Ness and the blocks just south of this intersection. The additional height will help emphasize Market Street's role as San Francisco's "main street", while enabling greater housing capacity along the City's most intensive transit spine. Heights will be varied to a scale and stature appropriate for the varying conditions along its length.

OBJECTIVE 2.3

PRESERVE THE AFFORDABILITY OF EXISTING HOUSING STOCK AND STRENGTHEN TENANT PROTECTION PROGRAMS.

POLICY 2.3.3

Discourage dwelling-unit mergers.

The Family Zoning Plan reinforces existing policies that discourage unit mergers by introducing new provisions that affirm the Planning Commission's commitment to preserving residential flats. The Plan maintains existing Code restrictions against merging and demolishing existing units in multi-family buildings.

OBJECTIVE 7.1

CREATE A VIBRANT NEW MIXED-USE NEIGHBORHOOD IN THE HUB.

POLICY 7.1.2

Encourage residential towers on selected sites.

The Family Zoning Plan will increase heights at key sites within the HUB subarea, encouraging more housing in one of the City's most transit-rich locations. The construction of residential towers would be permitted and encouraged, but projects must comply with new zoning requirements to ensure towers are appropriately scaled and integrated with the surrounding urban fabric.

NORTHEASTERN WATERFRONT AREA PLAN

OBJECTIVE 6
TO DEVELOP AND MAINTAIN RESIDENTIAL USES ALONG THE NORTHEASTERN WATERFRONT IN ORDER TO ASSIST IN SATISFYING THE CITY'S HOUSING NEEDS AND CAPITALIZE ON THE AREA'S POTENTIAL AS A DESIRABLE LIVING ENVIRONMENT.

POLICY 6.2
Encourage the development of additional housing wherever feasible (except on new or replacement fill).

POLICY 6.4
Encourage the development of a variety of unit types for households of all sizes where practical.

The Family Zoning Plan will allow increased heights within the Fisherman's Wharf subarea of the Northeastern Waterfront Area Plan. This targeted upzoning responds to the area's relatively underutilized character and has the potential to introduce significant new housing. In addition to addressing the City's broader housing needs, new residents would help enliven the neighborhood and provide a stronger balance between commercial, tourist, and residential uses.

The Housing Choice program enables flexibility in providing a variety of housing types and means of satisfying affordability requirements.

VAN NESS AVENUE AREA PLAN

Land Use

SUBAREA 1: Redwood to Broadway

OBJECTIVE 1
CONTINUE EXISTING COMMERCIAL USE OF THE AVENUE AND ADD A SIGNIFICANT INCREMENT OF NEW HOUSING.

POLICY 1.1
Encourage development of high-density housing above a podium of commercial uses in new construction or substantial expansion of existing buildings.

POLICY 1.4
Maximize the number of housing units.

POLICY 1.5
Employ various techniques to provide more affordable housing.

The Family Zoning Plan will increase heights along all portions of Van Ness Avenue within the Plan Area. The Van Ness Avenue corridor would see the most intensive housing capacity increases in the Family Zoning Plan. These height increases would allow for significantly more housing along this prominent corridor, consistent with its stature and role as a major transit spine. The addition of new residents would also strengthen the customer base, supporting a vibrant retail presence as envisioned in the Area Plan.

ENCOURAGE DEVELOPMENT WHICH REINFORCES TOPOGRAPHY AND URBAN PATTERN, AND DEFINES AND GIVES VARIETY TO THE AVENUE.

POLICY 5.1
Establish height controls to emphasize topography and adequately frame the great width of the Avenue, and support the redevelopment of the Avenue as a diverse, mixed use boulevard and transit corridor.

Although heights will increase along the entire corridor, they would remain sensitive to the surrounding topography, consistent with a key urban design value of San Francisco. The tallest buildings would be located at Geary Boulevard and Van Ness Avenue, with heights gradually tapering down in all directions.

Preservation of Significant Buildings

OBJECTIVE 11
PRESERVE THE FINE ARCHITECTURAL RESOURCES OF VAN NESS AVENUE.

POLICY 11.1
Avoid demolition or inappropriate alteration of historically and architecturally significant buildings.

The Housing Choice Program will not apply to projects that propose the demolition of listed historic buildings, including those identified in the Van Ness Avenue Area Plan. Projects proposing alterations to these landmarks could participate, but only if they comply with the City's Preservation Design Standards and satisfactorily pass review for appropriate alterations to such structures.

WESTERN SOMA AREA PLAN

OBJECTIVE 3.2
ENCOURAGE NEW NEIGHBORHOOD RESIDENTIAL USES IN LOCATIONS THAT PROVIDE THE GREATEST OPPORTUNITIES TO BUILD ON THE EXISTING NEIGHBORHOOD PATTERNS

POLICY 3.2.2
Encourage in-fill housing that utilizes design strategies that consider the existing built housing qualities in terms of heights, prevailing density, yards and unit sizes. [*as proposed for amendment*]

POLICY 3.2.3
Provide additional housing production incentives for areas identified as most appropriate for housing production.

The Family Zoning Plan will increase heights along the major arterials of the far western blocks of Western SoMa Area Plan while maintaining the lower scale of interior alley environments. These height increases would expand housing capacity on well-located, often underutilized sites.

OBJECTIVE 3.3
ENSURE THAT A SIGNIFICANT PERCENTAGE OF THE NEW HOUSING CREATED IS AFFORDABLE TO PEOPLE WITH A WIDE RANGE OF INCOMES

POLICY 3.3.3
Encourage a mix of affordability levels in new residential development.

The Family Zoning Plan and its Housing Choice Program enables flexibility in meeting the City's robust affordable. housing requirements.

WESTERN SHORELINE AREA PLAN

Transportation

OBJECTIVE 1
IMPROVE PUBLIC TRANSIT ACCESS TO THE COAST.

POLICY 1.5
Consolidate the Municipal Railway turnaround at the former Playland-at-the-Beach site

The SFMTA La Playa and Cabrillo Terminal Bus Loop site falls within the proposed SFMTA Non-Contiguous SUD, which would preserve and potentially expand its role as a key Richmond District bus facility while also allowing the addition of future housing.

Richmond and Sunset Residential Neighborhoods

OBJECTIVE 11
ENSURE DEVELOPMENT IN THE COASTAL ZONE ADVANCES HOUSING AND COMMUNITY DEVELOPMENT GOALS APPROPRIATE FOR THE LOCATION OF EACH PARCEL *[as proposed for amendment]*

POLICY 11.1
Consider the location of each parcel relative to both the city context, including major commercial and transit corridors, as well as the coast, when establishing standards for the form, design, and use of new development. *[as proposed for amendment]*

POLICY 11.3
Continue the enforcement of citywide housing policies, ordinances and standards regarding the provision of safe and convenient housing to residents of all income levels, especially low- and moderate-income people.

POLICY 11.4
Strive to increase the amount of housing units citywide, especially units for low- and moderate-income people

In most portions of the Western Shoreline Area Plan, existing height limits would be retained while permitting greater residential density. Select pockets along neighborhood commercial corridors would allow modest height increases, consistent with the City's broader policy of encouraging additional height along such corridors. The Family Zoning Plan and its Local Program also provide flexibility in meeting the City's robust affordability requirements.

BE IT FURTHER RESOLVED, that the Commission finds that the General Plan Amendments do not impose any new governmental constraints on the development of housing, as those terms are defined in

Policies 7.1.1 and 8.1.6 of the 2022 Housing Element, nor do they lessen the intensity of land use within the meaning of Government Code Section 66300(h)(1). The Commission further finds that the collectively, the General Plan Amendment, the Zoning Map Amendments and Planning Code Amendments, provide capacity for more than 36,200 additional units, which would more than offset any constraint or reduction in intensity on specific parcels, if any; and,

BE IT FURTHER RESOLVED, that the Commission finds the amendments to the Land Use Plan of the City's certified LCP meet the requirements of, and are in conformity with, the policies of Chapter 3 of the Coastal Act (California Public Resources Code Section 30200 et seq.) for the reasons set forth in the Consistency Analysis, attached hereto as Exhibit 7. The Commission further finds that the LCP amendments will be implemented in full conformance with the Coastal Act's provisions; and,

BE IT FURTHER RESOLVED, that the Commission has reviewed and considered the FEIR and CEQA Findings as modified by Addendum No. 1, and related findings previously adopted by the Commission for the Family Zoning Plan, including the statement of overriding considerations and mitigation monitoring and reporting program, the findings as set forth in Addendum No. 1, and the findings related to amendments to adopted mitigation measures set forth in Exhibit 8 to this Resolution. The Commission adopts the findings made in Addendum No. 1 and adopts the amendments to mitigation measures as proposed by Addendum No. 1 and identified in Exhibit 8; and,

BE IT FURTHER RESOLVED, that Commission finds and determines that the Project as modified by the 2025 Actions is within the scope of the Project analyzed in the FEIR as modified by the subsequent Addendum No. 1 and require no further environmental review pursuant to CEQA and the CEQA Guidelines Section 15180, 15162, and 15163 for the following reasons: (1) implementation of the 2025 Actions does not require major revisions in said FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and, (2) no substantial changes have occurred with respect to the circumstances under which the actions analyzed in said FEIR will be undertaken that would require major revisions to the FEIR due to the involvement of new significant environmental effects, or a substantial increase in the severity of effects identified in the FEIR; and, (3) no new information of substantial importance to the actions analyzed in said FEIR has become available which would indicate that (A) the Project as modified by the 2025 Actions will have significant effects not discussed in the FEIR; (B) significant environmental effects will be substantially more severe; (C) mitigation measures or alternatives found not feasible, which would reduce one or more significant effects, have become feasible; or (D) mitigation measures or alternatives, which are considerably different from those in the FEIR, will substantially reduce one or more significant effects on the environment; and,

NOW, THEREFORE, BE IT FURTHER RESOLVED, that the Commission hereby adopts the General Plan Amendments in the proposed Ordinance attached to this Resolution and recommends approval by the Board of Supervisors.

I hereby certify that the foregoing Resolution was adopted by the Commission at its meeting on September 11, 2025.

Jonas P Ionin Digitally signed by Jonas P Ionin
Date: 2025.09.17 14:36:55 -07'00'

Jonas P. Ionin

Commission Secretary

AYES: Campbell, McGarry, Braun, So

NOES: Williams, Imperial, Moore

ABSENT: None

ADOPTED: September 11, 2025

San Francisco Planning

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EXHIBIT 7

FAMILY ZONING PLAN – LOCAL COASTAL PROGRAM AMENDMENTS CONSISTENCY ANALYSIS

Purpose

This document provides an analysis of the consistency of amendments to the City's Local Coastal Program (LCP), proposed as part of the Family Zoning Plan, with relevant provisions of the California Coastal Act (Public Resources Code Division 20) and the certified LCP in accordance with California Code of Regulations, Title 14, Sections 13511 and 13552.

LCP Land Use Plan (LUP) Amendments

Summary of Proposed LUP Amendments

The proposed LUP amendments pertain to residential and commercial development in the Coastal Zone portions of residential neighborhoods in the Richmond and Sunset districts. The amendments revise Objective 11 of the LUP, which currently calls for preservation of the scale of development in those districts, to call for advancing housing and community development goals in a place-sensitive manner. Policy 1 under Objective 11, which currently calls for regulating the density and appearance of development in order to preserve the scale and character of residential neighborhoods, would be revised to call for regulation of the form, design, and use of development in a manner that takes into consideration both the Coast and the larger City context. The proposed amendments are necessary for the City to accommodate its Regional Housing Needs Allocation shortfall of 36,200 units under Housing Element law.

Standard of Review

Pursuant to Coastal Act Section 30512.2 (Chapter 6 Article 2), the standard of review for LUP amendments is that they must conform with the requirements of Chapter 3 policies of the Coastal Act to the extent necessary to achieve the basic state goals specified in Section 30001.5.

Relevant Coastal Act Requirements

The proposed LUP amendments concern high-level policy regarding regulation of residential and commercial development in existing developed areas located inland from the first public road. Relevant

Coastal Act requirements are therefore concentrated in Articles 6 (Development) and 2 (Public Access) of Chapter 3 (Coastal Resources Planning and Management):

Article 6: Development

Section 30250: Location; existing developed area

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

(b) Where feasible, new hazardous industrial development shall be located away from existing developed areas.

(c) Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.

Section 30251: Scenic and visual qualities

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Section 30252: Maintenance and enhancement of public access

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Article 2: Public Access

Section 30211: Development not to interfere with access

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212: New development projects

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway. […]

Section 30213: Lower cost visitor and recreational facilities; encouragement and provision; overnight room rentals

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

The commission shall not: (1) require that overnight room rentals be fixed at an amount certain for any privately owned and operated hotel, motel, or other similar visitor-serving facility located on either public or private lands; or (2) establish or approve any method for the identification of low or moderate income persons for the purpose of determining eligibility for overnight room rentals in any such facilities.

Consistency Analysis

The proposed LUP amendments would apply to the Coastal Zone portions of residential neighborhoods in the Richmond and Sunset districts, which are existing developed areas extending well inland from the Coastal Zone and identified as well-resourced neighborhoods in the Housing Element of the San Francisco General Plan. As articulated in the Housing Element, it is the City's goal to expand housing choice within well-resourced neighborhoods and promote neighborhoods that are well-connected, healthy, and rich with community culture. The proposed amendment to LUP Objective 11 aims to ensure that development in these neighborhoods advances the City's housing and community development goals as appropriate for the location of each parcel. The proposed amendment to Policy 1 would further clarify that the location of each parcel relative to both the coast and the city context should be considered when establishing standards for development, and that the city context includes major commercial and transit corridors.

Article 6: Development

The proposed LUP amendments identify existing developed areas as locations for advancing the City's housing and community development goals, and are therefore consistent with Section 30250 which encourages infill development by calling for new residential and commercial development to be located within such areas.

The amendments require that both the coast and the city context be considered when establishing standards for development, thus reconciling the need for housing and community development in these neighborhoods with Section 30251's requirement that scenic and visual qualities of coastal areas be considered and protected as a resource of public importance. The established street pattern

in the Sunset and Richmond districts is a rectilinear grid with frequent uninterrupted streets arrayed orthogonally to the coast. All existing developed areas are inland from the first public road, which is generally parallel to the coast, and all land between the coast and first public road is publicly owned open space. These street and land-use patterns ensures that public views to and along the coast, generally available from public streets and open space, are protected from development impacts consistent with Section 30251. Furthermore, by requiring consideration of the city context when establishing development standards, the amendments are compatible with Section 30251's requirement that development be visually compatible with the character of surrounding areas, where these surrounding areas are considered as established City neighborhoods with boundaries that extend well inland of the Coastal Zone.

Section 30252 requires that the location and amount of new development maintain and enhance public access to the coast, including via transit and other non-automotive modes. The Richmond and Sunset districts include several transit corridors with high-quality rail and bus lines that connect the Coastal Zone with the rest of the City and with regional transit. The City's housing and community development goals as articulated in the Housing Element call for expanding housing choices and neighborhood commercial activity along these corridors. Implementing these goals in the Coastal Zone neighborhoods, as called for in the proposed LUP amendments, would help support this transit service, consistent with Section 30252. Furthermore, the established neighborhood street grid is fine grained and highly walkable, thus providing residents and visitors with abundant opportunities for non-vehicular circulation as required by this Section.

Article 2: Public Access

The existing street pattern of the Sunset and Richmond districts, discussed above, ensures that development will not interfere with access to the sea consistent with **Section 30211**. Likewise, since the proposed LUP amendments pertain to existing developed areas that are all inland from the nearest public roadway to the shoreline, the proposed LUP amendments are consistent with **Section 30212**.

The coast adjacent to the Sunset and Richmond districts is publicly owned and includes beaches, parks, and other recreational facilities that are free to all, consistent with **Section 30213** which calls for the provision of lower cost recreational facilities. In addition, the Richmond and Sunset districts include several commercial corridors that extend into the Coastal Zone and include establishments that provide lower cost services useful to visitors, such as grocery stores and take-out food establishments. The proposed LUP amendments would require consideration of these existing commercial corridors when establishing development standards, facilitating the continued presence of such establishments in the Coastal Zone.

LCP Implementation Plan (IP) Amendments

Summary of Proposed IP Amendments

The proposed IP amendments would modify development controls in the westernmost portions of the City's Richmond and Sunset districts. These are existing developed areas, inland of the first public road, and are

largely residential with moderate amounts of neighborhood- and visitor-serving commercial uses. These areas are designated for residential and commercial uses under the current IP, and the proposed amendments would continue this designation while allowing more housing and complete neighborhood amenities as appropriate in both the City and Coastal context. In particular, the amendments would:

- create the Housing Choice – San Francisco (HC-SF) program which includes a local residential bonus program that is similar to the State Density Bonus law in that it allows additional residential development opportunities in certain circumstances. The HC-SF program also includes a Housing Sustainability District to encourage housing production on certain infill sites near public transportation;
- create the R-4 Height and Bulk District, which will provide for form-based density, and increased height limits for projects using the HC-SF Program;
- reclassify certain properties as Residential Transit Oriented, Commercial District (RTO-C), which permits a wide array of neighborhood-serving uses at limited sizes along with housing, subject to form-based density;
- require minimum densities in transit-rich locations and impose maximum size limits on residential units;
- create the San Francisco Municipal Transportation Agency Special Use District (SFMTA SUD), which is comprised of parcels owned by the SFMTA, most of which are currently used as parking lots. The SUD allows development of market-rate and affordable housing consistent with each parcel's surrounding zoning district, as well as other zoning modifications specific to the SUD; and
- modify the zoning controls in Neighborhood Commercial (NC-1, NC-2, NC-S) Districts in the Coastal Zone to allow for form-based density and reclassify certain properties as NC-2.

Standard of Review

The standard of review for IP amendments is that they must be consistent with and adequate to carry out LCP Land Use Plan (LUP) provisions. The proposed IP amendments will be paired with LUP amendments that will be adopted locally and submitted for Coastal Commission certification concurrently with the IP amendments. The standard of review for the proposed IP amendments is therefore the LUP as amended by the accompanying LUP amendments.

Relevant LUP Provision

The proposed IP Amendments concern residential and commercial development in the Coastal Zone portions of residential neighborhoods in the Richmond and Sunset districts. The applicable LUP provisions are in the Richmond and Sunset Residential Neighborhoods section (Objective 11 and related policies, as proposed to be amended), with additional provisions in the Transportation section (Objective 1 and related policies) and the Coastal Hazards section (Objective 12 and related policies):

> **RICHMOND AND SUNSET RESIDENTIAL NEIGHBORHOODS**
>
> OBJECTIVE 11: ENSURE DEVELOPMENT IN THE COASTAL ZONE ADVANCES HOUSING AND COMMUNITY DEVELOPMENT GOALS APPROPRIATE FOR THE LOCATION OF EACH PARCEL.

Policy 1: Consider the location of each parcel relative to both the city context, including major commercial and transit corridors, as well as the coast, when establishing standards for the form, design, and use of new development.

Policy 2: Develop the former Playland-at-the-Beach site as a moderate density residential apartment development with neighborhood commercial uses to serve the residential community and, to a limited extent, visitors to the Golden Gate National Recreation Area.

Policy 3: Continue the enforcement of citywide housing policies, ordinances and standards regarding the provision of safe and convenient housing to residents of all income levels, especially low- and moderate-income people.

Policy 4: Strive to increase the amount of housing units citywide, especially units for low- and moderate-income people.

Policy 7: Maintain a community business district along Sloat Boulevard within the Coastal Zone to provide goods and services to residents of the outer Sunset and visitors to the Zoo and Ocean Beach.

TRANSPORTATION

OBJECTIVE 1: IMPROVE PUBLIC TRANSIT ACCESS TO THE COAST.

Policy 1: Improve crosstown public transit connections to the coastal area, specifically Ocean Beach, the Zoo and the Cliff House.

Policy 5: Consolidate the Municipal Railway turnaround at the former Playland-at-the-Beach site.

COASTAL HAZARDS

OBJECTIVE 12: PRESERVE, ENHANCE, AND RESTORE THE OCEAN BEACH SHORELINE WHILE PROTECTING PUBLIC ACCESS, SCENIC QUALITY, NATURAL RESOURCES, CRITICAL PUBLIC INFRASTRUCTURE, AND EXISTING DEVELOPMENT FROM COASTAL HAZARDS.

Policy 12.4: Develop the Shoreline in a Responsible Manner.

Consistency Analysis

Richmond and Sunset Residential Neighborhoods section

The proposed IP amendments would establish eligibility for the HC-SF Local Program (Local Program), which qualifies eligible projects for certain height, density, and code flexibility. Eligible projects would generally be required to meet inclusionary housing requirements, thus increasing the amount of housing for residents of all income levels, especially low- and moderate-income people, consistent with Policies 3 and 4 of this section.

Allowable building heights under the current IP are generally 40 feet. The proposed IP amendments include moderate increases in allowable heights along transit and commercial corridors, mostly for projects using the Local Program. Most height limit increases proposed within the Coastal Zone are located at least one block inland from the first public road and are components of larger district-wide patterns that extend beyond the Coastal Zone, consistent with Objective 11 and Policy 1.

Consistent with Policy 2, the proposed IP amendments would facilitate redevelopment of under-developed portions of the former Playland-at-the-Beach site with moderate density residential and neighborhood commercial uses by allowing moderate height increases under the Local Program and for SFMTA Joint Development (see below), and by reclassifying certain properties from the Neighborhood Commercial Shopping Center (NC-S) zoning use district to the Small-Scale Neighborhood Commercial (NC-2) zoning use district.

The amendments would retain the existing NC-2 zoning use district along Sloat Boulevard, consistent with Policy 7. Furthermore, the amendments would reclassify certain properties along other established transit and commercial corridors from various residential zoning use districts to the RTO-C zoning use district, allowing for additional commercial uses to serve the residential community and visitors in addition to the two commercial clusters named in Policies 2 and 7.

Transportation

The proposed IP amendments would allow and encourage denser residential and mixed-use development in existing walkable neighborhoods that are well-served by existing high-quality public transit, particularly along crosstown transit corridors that connect the Coastal Zone to the rest of the city and to regional transit. The amendments are consistent with Objective 1 and related Policies since transit can achieve greater ridership and cost-effectiveness by serving areas with higher densities and other complementary elements such as mixed uses and pedestrian connectivity.

The SFMTA's La Playa/Cabrillo Terminal Loop at 780 La Playa Street is located at the former Playland-at-the-Beach site and supports crosstown public transit connections to the Coastal Zone including the northern portion of Ocean Beach and the Cliff House. The proposed IP amendments would reclassify the Terminal site from the Low Density Mixed Residential (RM-1) zoning use district to the NC-2 zoning use district, and into the Non-Contiguous SFMTA Special Use District in implementation of the SFMTA Joint Development Policy. The proposed zoning reclassification, base height increase to 50', and Local Program height increase to 85' would all facilitate residential mixed-use redevelopment of the site while retaining the ability to maintain and improve transit-related uses, consistent with Objective 1 and related Policies.

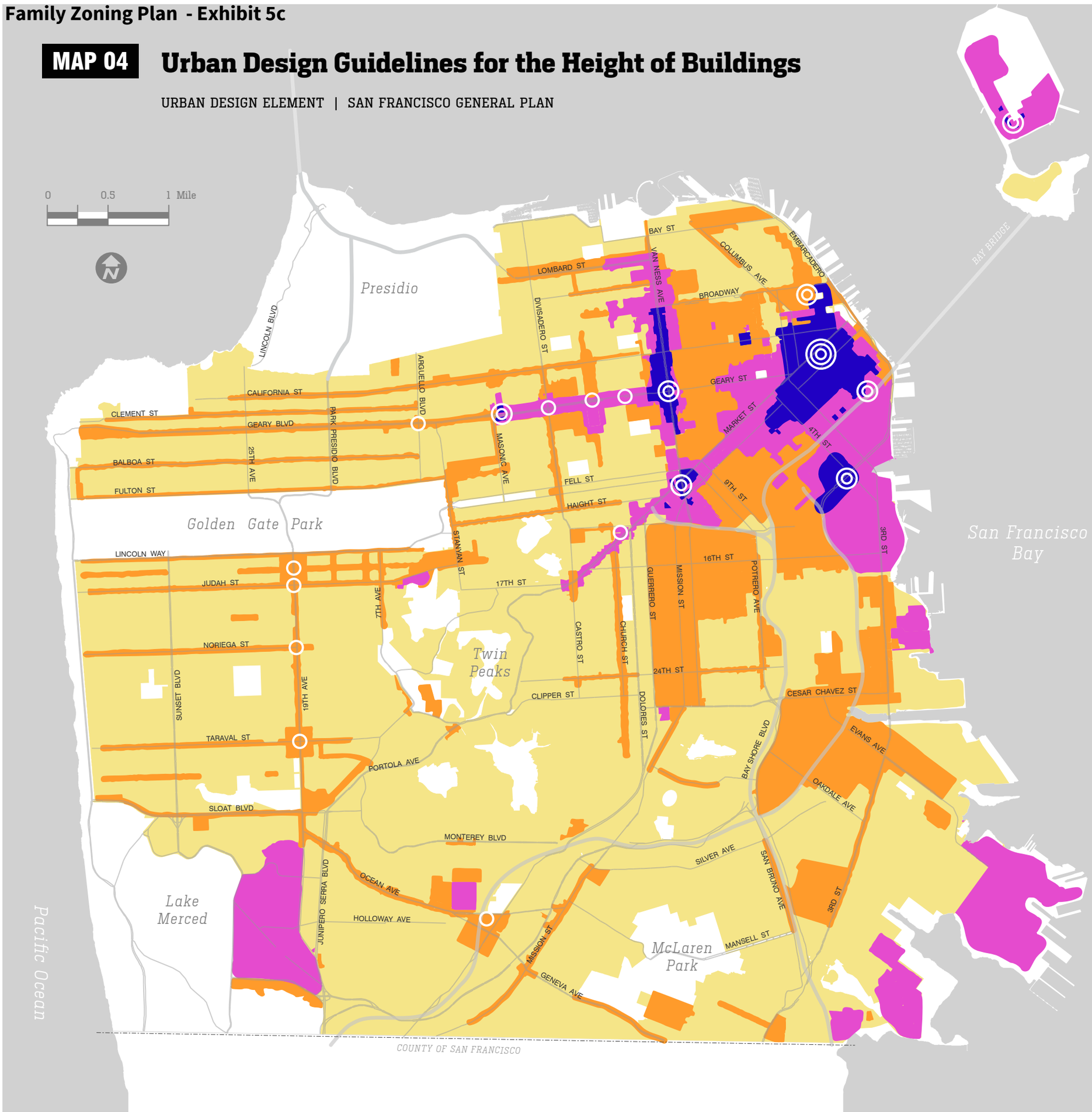
Coastal Hazards

Objective 12 and related Policies are mostly concerned with the shoreline, while the proposed IP amendments would only apply to existing developed areas inland from the first public road. Policy 12.4 states that development in the Coastal Zone should be sited to avoid coastal hazard areas when feasible, and requires design and construction mitigations where avoidance is not feasible. As of this time the City has not identified any coastal hazard areas overlapping the areas to which the proposed IP amendments apply, and the amendments are thus not in conflict with Policy 12.4. In accordance with California Senate Bill No. 272 the City is developing a Sea Level Rise Plan (SLR Plan), as part of the City's LCP, including vulnerability assessment, adaptation strategies, and recommended projects. The SLR Plan may identify new coastal hazard areas, in which case it may propose new development controls or other guidance to minimize impacts to public safety and property from relevant hazards.

Family Zoning Plan - Exhibit 5c

MAP 04 Urban Design Guidelines for the Height of Buildings

URBAN DESIGN ELEMENT | SAN FRANCISCO GENERAL PLAN



General Residential Neighborhood Fabric

Generally up to four stories, with 5 or 6 stories in certain conditions, such as adjacent to major transit corridors and certain major employment or educational centers, corner parcels, and large sites.[3]

Commercial Streets, Major Transit Corridors, and General Mixed Use Districts

65' on narrower or less significant streets, 85' on wider and more significant streets or segments of streets. General medium density mixed-use areas and major industrial areas should have height limits from 6 to 8 stories.[2, 3]

High-Density Residential and Mixed-Use Neighborhoods, Lower Scale High-Rise Districts

A general fabric of 8 to 25 story buildings. Most areas typically 85' podium buildings, with some areas of taller structures, including widely-spaced lower towers.[2]

High-Rise Districts

Concentrated areas or corridors of tall buildings. Tower spacing controls above street wall heights related to street width.

Points on Skyline and Taller Height than Surrounding Area

Neighborhood Skyline Markers

Notable Citywide Skyline Sub-Peaks

Tallest Peak of Skyline Citywide

NOTES:

1. Guidelines for Building Height Limits are intended to convey the desired actualbuilt height of buildings inclusive of any bonuses or other regulatory programs. This diagram conveys policy intent and guidance for the establishment of height limits and regulatory programs, and should not be construed or used as a regulatory map of height limits.
2. Pockets of lower height limits may be warranted in discrete areas to address certain conditions, such as residential enclaves on narrow alleys, listed historic districts, adjacencies to certain open spaces, or other conditions.
3. Public, cultural and institutional buildings may, on a case-by-case basis, rise above the prevailing neighborhood heights by a modest amount due to their civic importance and role as visual landmarks.
4. Buildings in open spaces and on piers require special review and consideration. Not all open spaces are shown this generalized map.

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Executive Summary

ADOPTION OF GENERAL PLAN AMENDMENTS; PLANNING, BUSINESS, AND TAX REGULATIONS CODE AMENDMENTS; AND ZONING MAP AMENDMENTS

HEARING DATE: SEPTEMBER 11, 2025

Record No.:	2021-005878 GPA PCA MAP
Project Name:	Family Zoning Plan
Staff Contact:	Lisa Chen – (628) 652-7422 Lisa.Chen@sfgov.org
Reviewed By:	Rachael Tanner, Director of Citywide Planning

RECOMMENDATION: Adoption with Modifications

Summary

On September 11, 2025, the Planning Commission will consider a series of approval actions related to the proposed Family Zoning Plan ("Plan"). The actions before the Commission include the following:

1. Recommendation to the Board of Supervisors to **approve Planning, Business, and Tax Regulations Code Amendments** to establish the key zoning controls and other regulations that will be applicable to development projects in the proposed Family Zoning Plan, and in some cases, citywide or other geographies.

2. Recommendation to the Board of Supervisors to **approve Zoning Map Amendments** to modify the use districts and the height and bulk districts for parcels in the Housing Opportunity Areas and surrounding areas that are proposed to be rezoned through the Family Zoning Plan.

- Recommendation to the Board of Supervisors to **approve General Plan Amendments** to amend the Urban Design Element, Commerce and Industry Element, Transportation Element, the Balboa Park Station Area Plan, the Glen Park Community Plan, the Market and Octavia Area Plan, the Northeastern Waterfront Plan, the Van Ness Avenue Area Plan, the Western SoMa (South of Market) Area Plan, the

Western Shoreline Area Plan, the Downtown Area Plan, and the Land Use Index;

This Executive Summary includes content on the following topics:

1. Project Background
2. Family Zoning Plan: Proposed Zoning Map
3. Family Zoning Plan Legislation
4. Environmental Review
5. Required Commission Action
6. Recommendation
7. Basis for Recommendation
8. Issues for Consideration
9. Attachments

Background

The Family Zoning Plan (Housing Element Rezoning Program) is a state-mandated implementation action identified in the certified 2022 Housing Element Update (Housing Element). The Housing Element was unanimously adopted by the Board of Supervisors in January 2023 and subsequently certified by the California Department of Housing and Community Development (HCD). The Housing Element Update serves as San Francisco's plan for meeting our housing needs for the next 8 years (2023-2031).

Through the Housing Element and rezoning, we are creating more space for families, workers, and the next generation of San Franciscans. In the 2022 Housing Element, the City committed to rezoning to accommodate 36,200 additional **homes** above the city's current zoning to meet state requirements. Since the Housing Element was adopted, the Department has been working on the Housing Element Rezoning Program, the *Family Zoning Plan* (formerly known as Expanding Housing Choice). Starting in February 2023, the Department conducted significant public outreach and held 17 public hearings at the Planning Commission and other City commissions.[1]

In addition to the rezoning legislative package, the Board of Supervisors have **introduced complimentary ordinances intended to supplement the Family Zoning Plan**. Most notably, the Department has partnered with Mayor Lurie and with Supervisor Chyanne Chen to introduce an accompanying Tenant Protections Ordinance focused on local implementation of Senate Bill 330. The ordinance will strengthen existing

[1] The Community Engagement Summary for Spring 2023 – Spring 2024 may be accessed at: https://sfplanning.org/sites/default/files/documents/citywide/housing-choice/housingchoice_community_engagement_summary.pdf

polices and add additional measures to protect tenants in existing housing, particularly vulnerable low-income tenants. This ordinance is not described in this memorandum. It is expected to be introduced at the Board of Supervisors on September 9, 2025 and will be considered for adoption at the Planning Commission this Fall.

STATE REQUIREMENTS

The Family Zoning Plan will amend zoning policies primarily in the Housing Opportunity Areas[2] to increase capacity for multi-family housing to **satisfy the City's Regional Housing Needs Allocation (RHNA) shortfall of 36,200 housing units**. *Figure 1* illustrates the shortfall. [3]

The rezoning creates opportunities for more homes in the Housing Opportunity Areas, where the zoning has limited multifamily housing construction in recent decades. Rezoning in these areas fulfills state and federal laws that require the City to **Affirmatively Further Fair Housing (AFFH)** through actions that:

> *"…[C]ombat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and life barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all Californians."*[4]

One way San Francisco will advance this goal is by focusing the rezoning in the Housing Opportunity Areas. In these areas, exclusionary zoning has limited the ability for apartments, condominiums, and other lower cost forms of housing to be developed. Zoning as well as restrictive covenants and other exclusionary practices prevented low-income and persons of color from living in these areas. Significant portions of these neighborhoods have maintained primarily single-family zoning, which creates housing types that are less affordable to low-income households.

The state has found Housing Opportunity Areas to have higher incomes, better-performing public schools, more economic opportunities, and lower environmental pollution – all of which have been shown to provide positive outcomes for low- and moderate-income residents.[5] To reverse patterns of racial and economic segregation, the City can create more permissive zoning that allows multifamily homes to develop alongside single family homes.

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[2] Areas designated as "Highest Resource" and "High Resource" on the Opportunity Area Map published by California Department of Housing and Community Development, developed by the California Tax Credit Allocation Committee (CTCAC). These areas were also called "Well-Resourced Neighborhoods" in the 2022 Housing Element.

[3] The State of California requires each region of the state to plan for a certain number of homes within a certain timeframe. San Francisco's requirement is 82,200 homes by 2031. Per state guidelines, a 15% "buffer" was added to the 86,200-units to account for uncertainty, meaning that San Francisco is planning for a capacity of 94,300 more homes. The City was able to count roughly 58,100 units that are already approved or expected to be built in this timeframe; this is commonly referred to as the "pipeline". After accounting for these expected units, the remaining number San Francisco must plan for is 36,200 homes.

[4] California Department of Housing and Community Development's goal of Affirmatively Furthering Fair Housing (AFFH): https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing

[5] For more information regarding the data and development of the Housing Opportunity Areas, consult the information provided by the state California Tax Credit Allocation Committee (CTCAC)/ HCD Opportunity Areas Maps here: https://www.treasurer.ca.gov/ctcac/opportunity.asp

Although the proposed rezoning is concentrated in the Housing Opportunity Areas, significant housing production is still expected elsewhere in the city. This is due to development expected and permitted under existing zoning and approved plans, including from prior zoning changes such as Area Plans and Development Agreements that enabled mid-rise and high-rise housing.[6] These areas are where most new housing has been built over the past 20 years, and where most of the 58,100 units under existing zoning are expected to be produced during the 8-year Housing Element cycle (2023-31), shown in Figures 1 and 2 below.

Figure 1: Regional Housing Needs Allocation (RHNA) Gap Shortfall

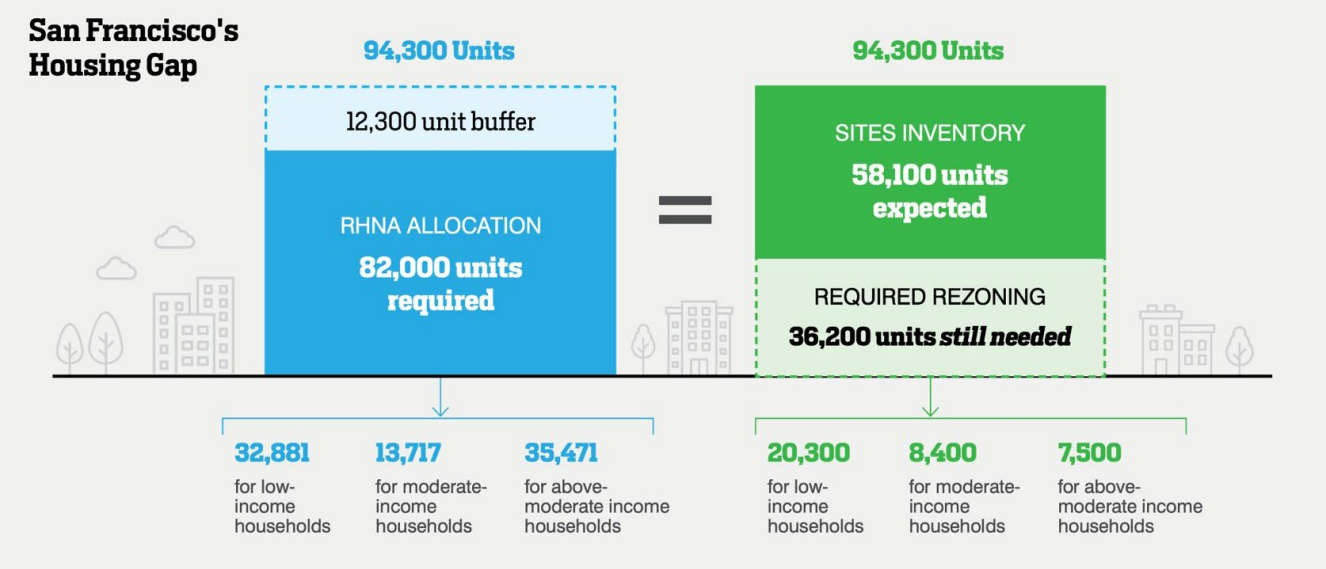
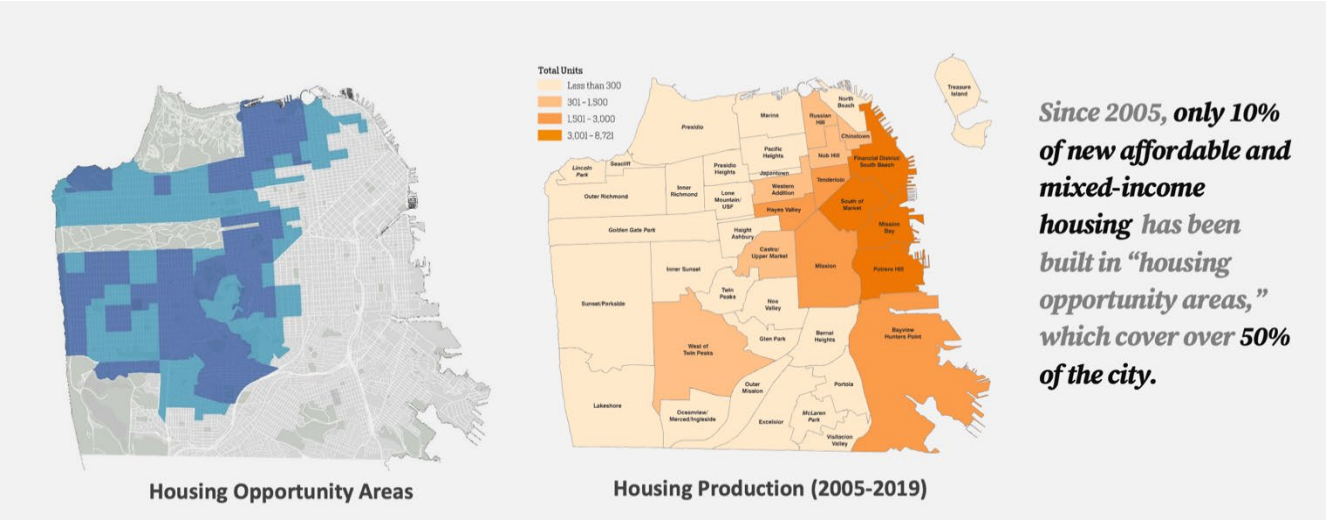


Figure 2: Housing Opportunity Areas & Housing Production (2005-2019)



[6] 2022 Housing Element Appendix B: Sites Inventory and Rezoning Program: https://sfplanning.org/sites/default/files/documents/citywide/housing-choice/housingchoice_element_appendixB_sites_inventory.pdf

FAMILY ZONING PLAN: KEY OBJECTIVES

At a high level, the Family Zoning Plan is meant to address the following needs and ambitions:

- **Ambitious zoning to meet the changing needs of our City and satisfy our statutory obligations in a way that works for San Francisco:** The magnitude of San Francisco's housing shortfall (36,200 units) **requires an ambitious response to get the City closer to meeting its goals,** particularly given the current economic conditions and low rate of housing production.

- **Maintains and strengthens the City's resolve to preserve existing multi-family and rent-controlled housing.** Existing multifamily housing must be maintained as the city grows and accommodates new neighbors in new homes built on opportunity sites. Housing Element law and other state laws support the preservation of existing housing by asking cities to identify sites suitable and available for housing. **State guidance encourages cities and their zoning plans to promote development of underutilized sites while preserving existing multifamily housing.** This proposal maintains our current tenant protections in San Francisco and limits the demolition of existing multifamily and/or rent controlled housing.

- **The proposal allows the City to control our own destiny by directing and shaping growth in ways that keep San Francisco special while making space for future generations.** By satisfying state requirements, which the proposal does, San Francisco can **avoid a state takeover of our zoning powers** and can retain essential funding for transit and affordable housing. The creation of the optional Local Program (described in a later section) also creates opportunities for growth consistent with core City policy goals and design standards, while adhering to state requirements.

- **Strengthening San Francisco neighborhoods to make space for families, workers, and the next generation of San Franciscans:** The rezoning plans for future growth and vibrancy of the city's neighborhoods while remaining sensitive to existing conditions and building on what makes San Francisco neighborhoods special. The rezoning, bolstered by updates to laws that will protect existing tenants and support small businesses, supports neighborhoods welcoming more neighbors. **More housing will be concentrated on streets without existing housing, and heights have been sculpted in consideration of public vistas from signature open spaces.**

- **Inclusive growth & expanding housing opportunities and affordability:** The rezoning adds more homes broadly across the plan area so that a diversity of housing options will be available throughout the entire City. New housing generates increased property tax revenue and funding for affordable housing, and creates more diverse housing in areas that are predominantly single-family, including housing for families, seniors, essential workers, people with disabilities, and others.

- **Financial feasibility & ease of implementation:** Trends and patterns from successful area plans and Development Agreements informs the zoning. The proposal is vetted by analyses of financial feasibility and likelihood of development and will be accompanied by zoning changes that provide clear objective standards and that allow for streamlined and ministerial project review.

The Department is in the process of developing a series of factsheets describing key project goals and describe various issues (such as small businesses and tenant protections), in particular to clarify topics

where there is frequent misinformation by providing supporting data and information. Some of these resources are listed in Exhibit 2b.

INFORMATIONAL HEARINGS & COMMUNITY ENGAGEMENT

Since Winter 2023, the Planning Department has presented 18 informational hearings on the progress of the program to related legislative bodies, detailed in *Figure 3 (Public Hearing Timeline)*.

Figure 3: Public Hearing Timeline

Date	Legislative Body	Topic
July 27, 2023	Planning Commission	Phase 1 Zoning Concept Maps
September 11, 2023	Small Business Commission	Support for small businesses in the areas proposed for the rezoning
October 2, 2023	Youth Commission	Phase 1 Zoning Concept Maps and youth perspectives on housing challenges and needs for new housing
November 30, 2023	Planning Commission	Phase 2 Draft Zoning Proposal (Fall 2023)
February 1, 2024	Planning Commission	Proposed Zoning Map (February 2024); Local Program overview
February 21, 2024	Historic Preservation Commission	Proposed Zoning Map (February 2024), Local Program overview, and Historic Preservation policies
June 6, 2024	Planning Commission	Phase 1 & 2 Engagement Summary, Objective Design Standards, Historic and Cultural Preservation policies
February 27, 2025	Planning Commission	Tenant Protections
April 7, 2025	Youth Commission	Proposed Zoning Map (April 2025), Community engagement
April 10, 2025	Planning Commission	Proposed Zoning Map (April 2025), Local Program updates
April 17, 2025	Planning Commission	Small Business Strategies
June 16, 2025	Board of Supervisors	Land Use & Transportation Committee (Informational Hearing): Proposed Zoning Map (June 2025), Rezoning Legislation
June 26, 2025	Planning Commission	Family Zoning Plan legislation; Financial Feasibility Analysis
July 17, 2025	Planning Commission	Affordable Housing Sites Analysis & Strategy, Infrastructure Planning, and General Plan Amendments
July 28, 2025	Small Business Commission	Family Zoning Plan legislation; Small Business Strategies
August 20, 2025	Historic Preservation Commission	Family Zoning Plan legislation; Historic preservation
August 25, 2025	Small Business Commission	Small business strategies (continued)
September 3, 2025	Historic Preservation Commission	Family Zoning Plan legislation; Historic preservation

The proposed zoning map and legislative amendments have been shaped iteratively over multiple rounds of feedback dating back to February 2023. Since Summer 2024, outreach has been focused on parsing and incorporating feedback from earlier rounds of community outreach and conducting supplemental events

and meetings with individual community and advocacy groups to hear more specific feedback on the Draft Zoning Map and associated policies.

Notably, in recent months there has been a noticeable increase in requests for community meetings. **From the release of the Family Zoning Plan in April 2025 through August 2025, Department staff have had over 50 community conversations in a variety of public settings,** including town halls, webinars, panel discussions, and Q&A sessions, and our team has numerous other such events scheduled through the Fall. We've also had countless other smaller meetings with individuals and small groups from community organizations to discuss various policy topics in greater detail.

The Department continues to hear mixed reactions to the idea of adding new housing. Some community members embrace zoning changes and push for taller heights and higher densities, while other community members want to see lower heights, less change, or avoid adding new housing altogether. The Department has worked to find a balance among these disparate viewpoints and is advancing a zoning proposal that fulfills state requirements for adding housing capacity, while incorporating specific feedback we've heard on areas that are most suitable and likely to produce new housing.

Community groups are welcome to request Planning Department presentations by contacting the project team via email at sf.housing.choice@sfgov.org.

Family Zoning Plan: Proposed Zoning Map

As part of the Family Zoning Plan, Mayor Lurie released several maps starting in April 2025 illustrating the key changes to height and density proposed in the Housing Opportunity Areas. The map currently under consideration, the **July 2025 Proposed Zoning Map (Exhibit 1)**, reflects community and policy maker input received during the adoption of the 2022 Housing Element and outreach on the Family Zoning Plan. The online map includes layers with previous drafts of the map, so that community members may track how the proposal evolved on specific parcels, as well as other geographic information and data layers to provide additional context.

The heights shown on the proposed **Local Program Map** illustrate the height limits that will be permitted under the Housing Choice SF Local Program. These heights are generally equivalent to heights that would be feasible and desirable for projects using other state density bonus options. Projects will have the option to use either the Local Program or state programs to achieve the heights on the proposed map.

The heights shown on the proposed **Base Height Map** applies to development not using the Housing Choice Local Program. Housing developments that are seeking to use state bonus programs would use this height limit to establish their "base project" to apply any bonuses or code relief, which could result in projects taller than base height limits and, in some cases, above the Local Program height limits. A project could also pursue a code complying project at these base heights if desired.

KEY GUIDING PRINCIPLES OF THE UPDATED MAP

Below are the key guiding principles that have shaped the locations and heights of housing development in the Proposed Zoning Map:

- In **residential areas surrounding the major transit and commercial streets**, zoning rules will be adjusted to encourage more units (generally under existing height limits) by removing density limits and instituting "form-based" zoning. For the vast majority of residential sites, these changes are only available for projects opting into the Local Program. **In most cases, the height limit will remain at 40 feet, the same as today. Approximately 77% of the parcels in the rezoning fall into this category and are not receiving a proposed height increase under the Plan.** Around a small number of streets (such as Market Street, Church St, Divisadero St, Columbus Ave, and others), projects may build an additional 1 story (up to 50') through the Local Program.

- The map continues to **concentrate new housing and proposed height increases on major transit routes, commercial streets, and other major hubs of activity**. These areas are better served by transit, retail, and other amenities, and contain more sites that are suitable and likely to be developed into housing. Comparing the proposed Local Program height limits to today's height limits, approximately 8% of parcels would receive a height increase of 1 to 2 additional stories (10' to 20'), another 8% would receive 3 to 4 additional stories (30' to 40'), and the remaining 7% would receive 5 or more stories of additional height (50' or more).

- **Additional new housing would be distributed broadly** across the "Housing Opportunity Areas" so that no single neighborhood or set of neighborhoods would receive most of the new housing.

- Most corridors would be rezoned (with height changes and removal of density limits) to result in **mid-rise development** (65' to 85', or 6-to-8 stories). Heights of 85' are generally proposed for wider streets adjacent to or near major transit lines and stations (such as rail and bus rapid transit).

- **High-rise heights** (ranging from 105' – 650', or 10-to-65 stories) are proposed in areas that:

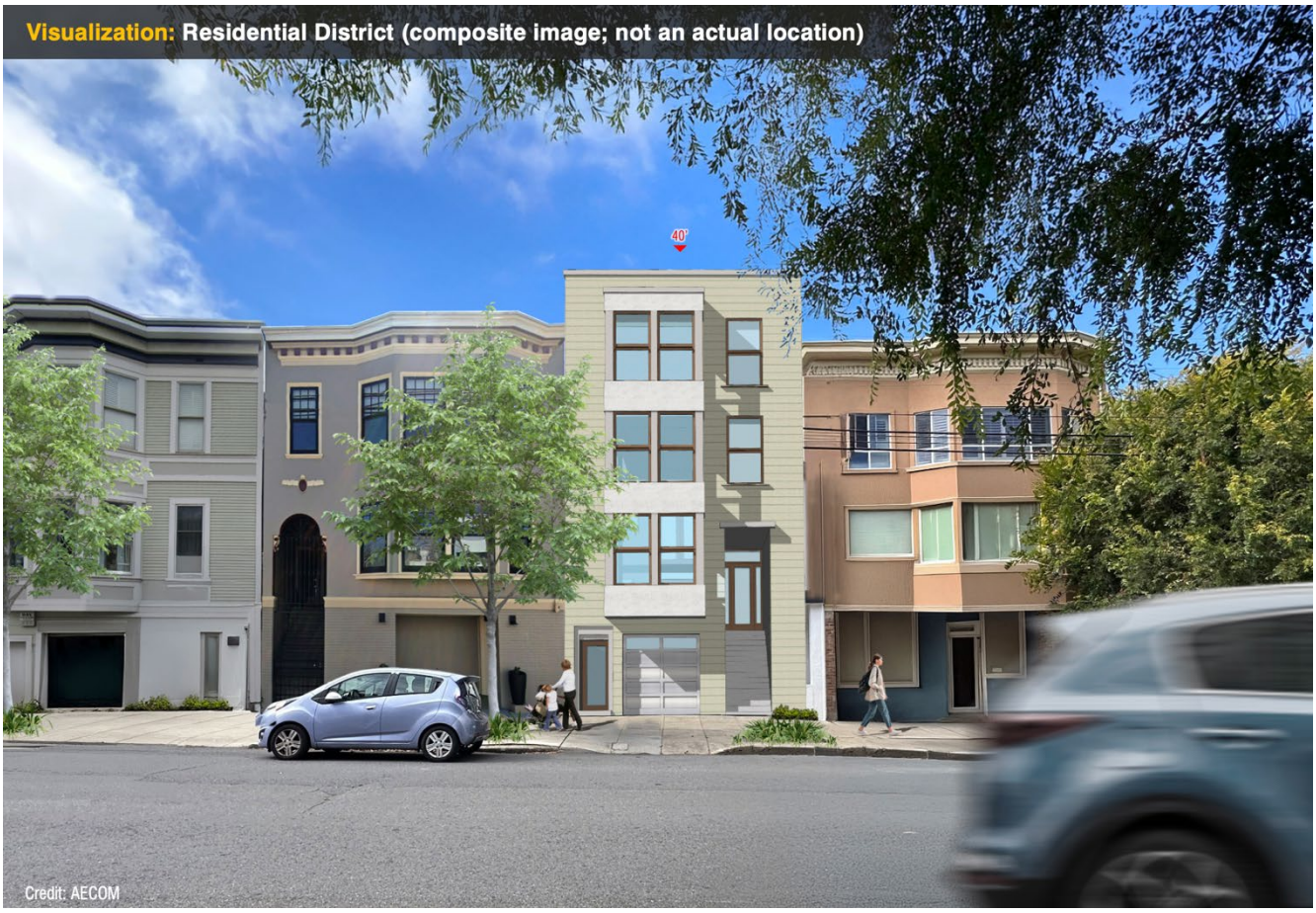
    - Currently allow high-rise construction above 85' (for example, the greater Van Ness corridor).
    - At key intersections along major corridors (for example, sections of Geary Boulevard and 19th Avenue).
    - Wider streets that have more medium- and large-sized parcels that are well suited for housing development (for example, Market Street and Lombard Street).
    - Areas near major transit (for example, Market Street, Geary Boulevard, Glen Park).

- **Opportunity sites** throughout the well-resourced neighborhoods that meet a certain size threshold (8,000 square feet), such as public, nonprofit, and religious sites, will be permitted higher height limits. This approach leverages properties that are particularly well-suited to comfortably accommodate more housing—especially affordable housing.

- The proposal has been **mindful of the core physical patterns of San Francisco and in keeping with principles of the Urban Design Element**. The approach considers key characteristic views from major

public vantage points, such as from the tops of hills, parks known for their views, and from the waterfront. The proposal also fulfills the Urban Design Element's guidance to locate taller buildings in areas of greater activity and transit access and to mark key locations in the City. While the visual impact of new buildings will be felt most acutely by properties that are in their immediate proximity, collectively the proposal does not introduce major areas of tall buildings that would block key public views or change the overall perception of the landscape of the city.

The Department worked with urban design consultant AECOM to develop visualizations that illustrate how new homes of different scales may look at various example locations, shown below. The complete list of renderings that have been developed to date are provided in Exhibit 2.c ["Rezoning Visualizations (For Illustrative Purposes Only)]. Please note that the images do not portray actual proposed developments. They are meant to provide a sense of the scale of new homes under the proposed plan, and how communities may look and feel as new buildings are added incrementally.



Visualization: Divisadero St and Bush St
140'

Visualization: Lombard St at Richardson St
65 ft (6 stories)
65'
65'
Credit: AECOM

Family Zoning Plan Legislation

On June 24, 2025, Mayor Daniel Lurie introduced legislation to enact the Family Zoning Plan and commence the Plan's adoption process, in accordance with the state-mandated deadline of January 31, 2026. The Mayor subsequently introduced substitute ordinances on July 29, 2025 that made additional amendments to address technical errors and to make slight refinements to the Plan.

This section describes the legislative information contained in the legislative packet, including key documents whose adoption or approval will constitute the legislative amendments to enact the Family Zoning Plan. Exhibits 3, 4, and 5 of packet and the various subsections are organized around items that require Commission action, as follows:

- **Exhibit 3:** Planning, Business, and Tax Regulations Ordinance (Board File 250701).
- **Exhibit 4:** Zoning Map Ordinance (Board File 250700)
- **Exhibit 5:** General Plan Amendments Ordinance

The content of each Exhibit is briefly described below. The ordinances will amend the Zoning Map, Height Map, General Plan, and the Planning, Business, and Tax Regulations Codes. The legislative package will include substantial amendments to the Planning Code and will also make amendments to relevant existing zoning districts. It will revise or establish controls in key areas, such as height, bulk, minimum densities, design standards, affordable housing, parking limits, and allowable uses, among other topics.

EXHIBIT 3: PLANNING, BUSINESS, AND TAX REGULATIONS ORDINANCE (BOARD FILE 250701).

The amendments to the Planning, Business, and Tax Regulations Codes establish the key zoning controls and other regulations that will be applicable to development projects in the proposed Family Zoning Plan. Major components of the ordinance include:

- Creating a **new zoning district:** "RTO-C," a new additional variation of Residential Transit Oriented (RTO) zoning. RTO-C allows for form-based housing development and will permit (but not require) a variety of non-residential uses on the ground floor. As part of this change, the current Residential Transit Oriented ("RTO") district will be renamed to Residential Transit Oriented – 1 ("RTO-1") to improve clarity, though most of the underlying code requirements and standards will remain the same.

- Establishing an optional **Housing Choice SF Program ("Local Program")** a flexible zoning program meant to provide sponsors with additional options to develop housing at the proposed heights and densities while meeting various City and State policy goals.

- **Establishing a new "R-4" height and bulk district** in which all properties are designated with two height designations: 1) a "local program height" that is applicable to projects using the Housing Choice SF Program, and 2) a "base height" that is applicable to projects not using the Local Program. The heights can be read as "X base height // Y Housing Choice height." For example, "40//65-R-4"

allows a 40' height in the base and a 65' height under the Housing Choice SF Local Program.

- Implementing changes to advance the **efficient use of land near transit facilities**, in fulfillment of the Metropolitan Transportation Commission's Transit-Oriented Communities Policy and other city policies. This includes changing parking standards, adding minimum residential densities and office use intensities, establishing maximum unit sizes, and adjusting permitted curb cuts. This allows San Francisco to maintain priority funding for major transportation projects.

- Creating a Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District to **implement the SFMTA Joint Development Policy**. The policy was adopted by the SFMTA Board and the Board of Supervisors. The Planning Commission heard an informational presentation on this item on March 6, 2025.

- Allowing certain **Legacy Businesses** to relocate without a Conditional Use Authorization and waiving development impact fees for those businesses.

- Creating a **Housing Sustainability District (HSD)** which creates a ministerial approval process for housing projects that meet specified eligibility requirements.

- Modifying **height and bulk limits** to provide additional capacity in the Housing Opportunity areas.

- Revising **wind review standards** applicable to projects taller than 85' in selected zoning districts.

- Making **conforming changes** to zoning control tables in various Districts.

- Amending the **Local Coastal Program** to be consistent with the provisions above and directing the Planning Department to forward the ordinances to the California Coastal Commission upon the Plan's adoption.

Exhibit 3 includes the proposed Planning Code ordinance (Exhibit 3.b) and draft Resolution (Exhibit 3.a) to approve the Ordinance. It also includes summary tables that describe the code ordinance (Exhibit 3.c).

EXHIBIT 4: ZONING MAP ORDINANCE (BOARD FILE 250700)

The amendments to the Zoning Map would change use districts and height and bulk districts for parcels in the Housing Opportunity Areas and surrounding areas that are proposed to be rezoned through the Family Zoning Plan. It will do this through the following provisions:

- Reclassifying certain properties to the new **Residential Transit Oriented – Commercial ("RTO-C") district.** As part of this change, the current Residential Transit Oriented ("RTO") district will be renamed as Residential Transit Oriented – 1 ("RTO-1") to improve clarity. However, most of the underlying code requirements and standards will remain the same.

- **Reclassifying properties in the rezoning area with the new "R-4" height and bulk district**. Under this new district, all properties will receive a split height designation, with: 1) a "local program height" that is applicable to projects using the Housing Choice SF Program, and 2) a "base height"

that is applicable to projects not using the Local Program.

- **Changing the height limits on certain properties** in the Family Zoning Plan, including establishing a "local program" height for all properties in the Plan area, and in a smaller number of cases, modifying the "base height."

- **Reclassifying certain properties** from Public to Mixed-Use or Neighborhood Commercial Districts to allow housing development.

- Designating various properties to be included in the **Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District.**

- Amending the **Local Coastal Program** to be consistent with the provisions above and directing the Planning Department to forward the ordinances to the California Coastal Commission upon the Plan's adoption.

Exhibit 4 includes the proposed Zoning Map ordinance (Exhibit 4.b) and draft Resolution (Exhibit 4.a) to approve the Ordinance. It also includes a set of illustrative Zoning Maps by Supervisor District (Exhibit 4.c). The full parcel tables that describe the Zoning Map changes at a detailed parcel level are available on the Legistar webpage for the ordinance (Board File 250700).[7]

EXHIBIT 5: GENERAL PLAN AMENDMENTS ORDINANCE

The ordinance proposes amendments to various General Plan Elements and Area Plans for consistency with the Family Zoning Plan, including: Urban Design Element, Commerce and Industry Element, Transportation Element, the Balboa Park Station Area Plan, the Glen Park Community Plan, the Market and Octavia Area Plane, the Northeastern Waterfront Plan, the Van Ness Avenue Area Plan, the Western SoMa (South of Market) Area Plan, the Western Shoreline Area Plan, the Downtown Area Plan, and the Land Use Index.

The changes consist of removing outdated zoning and height maps, as well as language about height and density limits to align with the Housing Element and the general parameters of the Family Zoning Plan. The Amendments to the Western Shoreline Area Plan constitute amendments to the Local Coastal Program.

Exhibit 5 includes the proposed General Plan Amendments ordinance (Exhibit 5.b) and Draft Resolution (Exhibit 5.b). The Draft Resolution also contains master General Plan and Planning Code Section 101.1 consistency findings for all the actions related to adopting the Family Zoning Plan.

Attached to this staff report is also a memorandum **(Exhibit 5.c), providing more background on each of the Area Plans that overlaps with the Family Zoning Plan** as well as more specific information on how each Area Plan would be amended to allow for increased housing capacity.

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[7] https://sfgov.legistar.com/LegislationDetail.aspx?ID=7449404&GUID=0F95C63F-86D3-433A-8B92-069CAB240942&Options=ID|Text|&Search=250700

Environmental Review

On November 17, 2022, the Commission certified the Housing Element 2022 Update EIR in motion 21206, and adopted CEQA findings, a Statement of Overriding Considerations, and a Mitigation, Monitoring and Reporting program (MMRP) for the Housing Element 2022 Update on December 15, 2022 in resolution 21220.

On September 3, 2025, the Department published an addendum to the Housing Element 2022 Update FEIR, and found that the proposed Family Zoning Plan, including the General Plan, Planning Code and Zoning Map amendments, would not create any new or substantially more severe significant impacts than those described in the FEIR. The FEIR Addendum may be downloaded on the Department website at https://sfplanning.org/environmental-review-documents.

Required Commission Action

The proposed resolutions are before the Commission so that it may adopt them, reject them, or adopt them with modifications.

Recommendation and Basis for Recommendation

The Department recommends that the Commission **approve the proposed Ordinances with modifications** and adopt the attached Draft Resolutions to that effect.

The Department recommends the modifications shown in Table 4 below, which also describes the rationale recommended changes.

Table 4: Family Zoning Plan Legislation – Amendments Recommended by Department

#	Code Section	Change	Rationale
1	135	Reduce the usable open space requirement for Senior Housing (e.g. to 36 sq ft) and allow indoor community spaces to meet the requirement.	To make it easier to build senior housing and reduce requirements that may not be needed for this use type.
2	155.1	Eliminate or reduce (e.g., cut by 50%) the bike parking requirements for Senior Housing.	To make it easier to build senior housing and reduce requirements that may not be needed for this use type.
3	202.2(f)(1)(C)	Change the definition of Senior Housing so that there is no minimum number of units to qualify.	To make it easier to build senior housing at all scales.
4	202.17	Expand the waiver of the Conditional Use Authorization (for use authorization) and impact fees waivers from just Legacy Businesses to all displaced businesses.	To make it as easy as possible for a business to relocate if it is affected by new housing development.

#	Code Section	Change	Rationale
5	206.10(d)(1)	Waive ground floor height requirement (Section 145.1) for projects using the Local Program to allow a building of 9 stories in 85' height districts.	To permit more units within the 85' mid-rise construction typology, potentially creating more efficient buildings and reducing costs.
6	206.10(d)(1)(B)	Amend the unit mix requirement applicable to projects using the Local Program as follows: • 4-unit building: min one 2+BR • 5-9 units: min 25% 2+BR, including at least one 3+BR unit • 10+ units: min 25% 2+BR, including at least 5% 3+BR	To ensure a minimum number of 3BR units while creating more flexibility for very small projects.
7	206.1(d)(1)(E) and (K); various	Square Footage Bonus for additional multi-bedroom units in the Local Program: Projects of 3+ units can receive additional square footage added to their building envelope for providing: • 3BR units: 250 sq ft for each unit provided , including any the required unit(s) • 4+BR units: 400 sq ft for each unit provided including any required unit(s) In the R-districts, bonus square footage can be added horizontally through any combination of the following: • Reducing the required rear yard (from 30% down to 25% rear yard or 20 feet, whichever is greater). • Reducing the rear yard on the ground floor to 18% or 15 ft, whichever is greater. • Building into the required side yard, where applicable. • Reducing the required upper-story setback for additions to historic properties, from 15 feet down to 10 feet. (Preservation Design Standard P.5.1.1). In other districts, bonus square footage can be added horizontally as above, or vertically through the addition of additional height, generally not to exceed 1 additional story of height.	To provide incentives for new developments to include larger, family-sized units.

#	Code Section	Change	Rationale
8	206.1(d)(1)(E) and (K); 414A; various	Square Footage Bonus for family-friendly amenities in the Local Program: In R-districts, projects can get a square footage bonus for providing certain communal amenities, calculated as follows: • 2.0 sq ft bonus for each square foot provided of shared community rooms, shared kitchen, reservable room for overnight guests, extra storage for large objects, space for in-home childcare. Bonus square footage can be added horizontally through any combination of the following: • Reducing the required rear yard (from 30% down to 25% rear yard or 20 feet, whichever is greater). • Reducing the rear yard on the ground floor to 18% or 15 ft, whichever is greater. • Building into the required side yard, where applicable. • Reducing the required upper-story setback for additions to historic properties, from 15 feet down to 10 feet. (Preservation Design Standard P.5.1.1). In addition, projects that are providing an in-home childcare space may receive a waiver of their childcare fee obligation (Section 414A).	To provide incentives for new developments to include various amenities that are supportive of families and communal living arrangements.
9	206.10(d)(1)(F)	Remove usable open space requirement for projects using the Local Program. Projects are still subject to applicable rear yard requirements.	To allow more flexibility to make the Local Program more competitive with the state density bonus. Project massing is still regulated by required rear yards (which would be 25-30% for Local Program projects).
10	206.10(d)(1)(G)	Remove Planning Code exposure requirements for projects using the Local Program.	To allow more flexibility to make the Local Program more competitive with the state density bonus. Projects are still subject to California Building Code requirements for unit exposure.

#	Code Section	Change	Rationale
11	206.10(d)(1)(K)	Add an additional Height Bonus available for projects in the Local Program, comprised of additional square footage for providing tenant improvements (e.g., a "warm shell").	To bring down the costs to occupy new storefronts, particularly for cost-prohibitive buildouts like food service uses.
12	206.10(d)(1)(K)	Square Footage Bonus and Code Flexibility for Preservation of historic structures. Add a bonus and code flexibility for adaptive reuse on sites with historic structures (which could include Category A buildings, designated Article 10/11 landmarks, and listed resources in the State or National historic registers) in districts other than R districts and in the RTO-C district that do not demolish the resource and comply with the Preservation Design Standards in ways that preserve the resource and reduce the volume of the project within the otherwise permitted building envelope not accounting for the historic structure. The bonus square footage shall be equivalent to 1.5 times the square footage foregone through setback or unused volume above the footprint of the historic structure. This volume can be used to expand the allowed volume of a building horizontally or vertically, not to exceed a certain additional number of stories (to be determined) or reduce the required rear yard above the ground floor to less than 15 feet where abutting the rear yard of parcels containing residential uses.	To incentivize the retention of historic properties, particularly undesignated or unlisted Category A historic resources, particularly in commercial corridors, while not precluding their redevelopment with housing using the Local Program.
13	206.10(d)(1); 303	Allow replacement of tourist hotels/motels of 75 rooms or less for projects using the Local Program, without a Conditional Use Authorization (2/3 of the gross square footage must be residential).	To allow existing hotel uses to continue on a site (even if it is not the same operator).
14	206.10(d)(1)	State that future revisions to the Housing Choice SF program must satisfy two conditions: 1) Any proposed new or increased government constraints in the Housing Choice SF program must be offset by decreasing constraints; and, 2) Substantive changes to the applicability and/or development standards in the Local Program must be analyzed for consistency	To ensure that future amendments to the Local Program remain competitive with state programs and do not negatively affect the City's compliance with state law and the adopted Housing Element.

#	Code Section	Change	Rationale
		with Housing Element statute in Government Code 65583(a)(3).	
15	209.4	Edit the Use Size Control for the RTO-C district and delete the first clause ("P: up to 4,999 gross square feet per lot") so that it reads as follows: "P: Non-Residential use of any size that is part of a project where at least 2/3 of the floor area contains Residential uses. C: Non-residential use in new development, changes of use, or addition of more than 20% to an existing structure, in which the non-residential uses constitute more than 1/3 of the gross square footage of the proposed new, converted, or enlarged structure(s)."	Ensure new projects are at least 2/3 residential, to satisfy state requirements.
16	311	Codify early notification for commercial tenants. Upon receipt of a development application on a commercial corridor, the Planning Department will send mailed notice to the address (to notify any commercial tenants) and notify the Office of Small Business.	To provide as much advance notice to the City and commercial tenant and allow for sufficient time to make a plan if relocation is needed.
17	317(c)(12)	Edit the proposed language to read: *(12) Residential Flats. Notwithstanding anything to the contrary in this Section 317, projects that propose the Merger, Reconfiguration or Reduction in size of Residential Flats shall not require a Conditional Use Authorization if the project would increase the number of units on the property.*	Clarification of language consistent with existing Commission policy. Removes reference to demolitions which would still be subject to Section 317.
18	Various	Clean up Planning Code Section 151 references and supersede those with 151.1 references. PC 151.1 is the only remaining off-street parking section.	Technical cleanup.

Issues for Consideration

This section describes other topics for the Commission to consider, including:

- **Consistency with Housing Element and State Laws**
- **Connection to San Francisco's Local Coastal Plan**
- **Racial and Social Equity Analysis**
- **Other Issues for Consideration**

CONSISTENCY WITH HOUSING ELEMENT AND STATE LAWS

To date, all versions of the proposed map have been developed to ensure alignment with the guiding principles listed above and consistency with the 2022 Housing Element and state laws. The current map remains broadly consistent with example maps published in the adopted Housing Element and the rezoning scenarios studied as part of the Housing Element Environmental Impact Report.

The Department has been using several analytical methods to ensure the proposed map meets the City's RHNA obligations. First, proposed heights and density adjustments are run through a unit capacity estimation calculation that was used for the Housing Element Sites Inventory of Sites Proposed for Rezoning (Housing Element Appendix B4, Table B). This method has been commonly used to estimate capacity for all of San Francisco's past rezonings and to identify sites more likely to develop based on various site characteristics, including existing uses and underdevelopment relative to proposed zoning. The results indicate that the proposed zoning map plans for housing capacity exceeding our RHNA shortfall.

Second, the proposed zoning map is also evaluated through a housing feasibility model. The Department has been working with external modelling experts and researchers to refine other analytical models that evaluate the feasibility of housing development on every parcel to estimate of how much new housing development is financially feasible with the proposed zoning changes under a range of reasonable economic conditions. In addition to the unit capacity methodology listed above, this model has guided refinements to the map that are necessary to demonstrate that rezoning could reasonably produce the RHNA shortfall.

To augment both of these analyses, the Department has been developing a review of the development activity from previous rezonings and citywide that occurred over a period of time in those areas and compared that data to the capacity estimates that the Department developed at the time of those rezonings, as well as evaluating how much housing has been entitled and produced citywide relative to overall citywide zoned capacity over recent decades. This review is intended to inform any adjustments that might need to be made to the outputs of the above modeling methods.

Finally, the Department has consulted with Century Urban, a real estate consultant, to evaluate the development feasibility of a range of building typologies in San Francisco. Among a number of common factors that affect the financial feasibility of a development, the study considered building size, location, lot size, number of units, construction hard and soft costs, and the review process that a project must undergo to be constructed. The Department also worked with Century Urban on a study of how government-imposed costs (such as fees, inclusionary housing requirements, and lengthy permitting timelines) impact project feasibility, to fulfill Housing Element Action 8.1.8, which required completion of a "pro-forma-based study of cumulative governmental constraints on housing development in relation to the socio-economic needs of the city." The results of these studies were discussed at the informational Commission hearing on June 26, 2025.

CONNECTION TO SAN FRANCISCO'S LOCAL COASTAL PLAN

The Local Coastal Program (LCP) is a policy and regulatory document required by the California Coastal Act that establishes land use, development, natural resource protection, coastal access, and public recreation policies for San Francisco's Coastal Zone. The Coastal Zone extends approximately 6 miles along the City's Pacific (western) shoreline, from the Point Lobos recreational area in the north to the Fort Funston cliff area in the south. This area is covered by the Western Shoreline Area Plan of the General Plan (WSAP).

The LCP consists of two components: (1) the Implementation Plan and (2) the Land Use Plan. The former is comprised of Planning Code provisions that relate to development within the Coastal Zone that have been certified by the California Coastal Commission (CCC). The latter consists of those portions of the WSAP that have been certified by the CCC. Because the General Plan Amendments for the Family Zoning Plan include amendments to the WSAP, an amendment to the Land Use Plan of the LCP is required. The Draft Ordinance includes instructions to the Planning Department to submit the approved General Plan Amendment to CCC for certification following City approval. Department staff completed a Consistency Analysis of the proposed Local Coastal Program Amendment associated with the adoption of the Family Zoning Plan, attached to this report as Exhibit 7, in accordance with California Code of Regulations, Title 14, Sections 13511 and 13552.

HOUSING CHOICE SF PROGRAM ("LOCAL PROGRAM")

As described in previous Commission hearings, the proposed rezoning is structured so that housing projects will have multiple pathways to achieve the heights illustrated in the Local Program map (Exhibit 1). They may use: 1) the Housing Choice SF Program ("Local Program"); or, 2) the "base heights" layered with other state or local bonus laws, such as the State Density Bonus or AB2011.

The Local Program is meant to be a parallel program to state programs (such as the State Density Bonus) and sponsors may elect either option depending on which is most advantageous for the project. **Projects using the Local Program must opt out of using state bonus programs and meet objective code requirements and design standards.** The Local Program allows us to maintain what makes San Francisco special while welcoming new homes.

How to qualify: To qualify, projects must meet the following requirements:

- Contain at least two or more units and add at least one additional unit;
- Located within the rezoned area (also referred to as the R-4 Height and Bulk District);
- Does not take advantage of State Density Bonus program or other state program that provides its own bonuses or waivers from local zoning standards;
- Does not involve the demolition of a structure designated as a landmark under Article 10, is listed as contributor to an historic district in Article 10, is listed as a Significant or Contributory Building under Article 11, is listed in the California Register of Historic Resources, or is listed on the National Register

of Historic Places;

- Complies with the Citywide Design Standards and the Preservation Design Standards, except where otherwise allowed to be modified through the Local Program's Major Modification process;

Local Program projects may still use provisions in state law that provide for entitlement process streamlining (i.e., ministerial review), such as those created by AB2011 and SB423, provided they meet those program's applicable criteria.

Projects using the Local Program will receive flexibility from some Planning Code controls (e.g., development benefits), described in Figure 5 below. Projects that choose to use the Local Program would be able to choose an unlimited number of benefits from this menu of "local waivers." **The topics listed here reflect the draft ordinance as currently filed (Board File 250701, version 2) and do not reflect the recommended amendments described in the prior section.**

The menu is derived from examining the most common waivers and concessions sought by projects recently using the State Density Bonus (ex: rear yard, exposure, usable open space, among other areas). The Department conducted outreach with industry experts and community groups to review the provisions of the local program and gather additional feedback on its implementation.

Figure 5: Local Program Development Benefits in Draft Ordinance (Board File 250701, version 2)

Topic	**Applicable Planning Code or Design Standard** *(Under Current Zoning)*	**Local Program "Automatic" flexibility** *(i.e., "waivers" in Local Program; current as of July 29th ordinance – Board File 250701 v.2)*
Density	Generally, parcels off-corridor and some parcels on corridors are subject to density limits based on lot size.	Projects using the Local Program, including off-corridor sites, would not be subject to lot-based density limits but rather to Form-Based Density standards.
Height	Projects are subject to the height limit (i.e. "base" height limit). Eligible projects using State Density Bonus or other programs may exceed the height limit per the rules of those programs.	Projects may extend up to the Local Program Height Limit as provided on the Proposed Zoning Map. Corner lots and lots larger than 8,000 square feet may go up to 65'. Projects may receive up to a 5' height increase to accommodate key architectural features, such as stoops and entries.
Inclusionary Housing	Projects may meet inclusionary housing requirements through: • Affordable Housing Fee;	Projects can choose any compliance method or some combination thereof to meet Section 415. Projects that elect

Topic	Applicable Planning Code or Design Standard *(Under Current Zoning)*	Local Program "Automatic" flexibility *(i.e., "waivers" in Local Program; current as of July 29th ordinance – Board File 250701 v.2)*
	• On-site Affordable Housing; • Off-Site Affordable Housing; • Small Sites; • Land Dedication (currently available in select districts) Projects using state density and ministerial review programs must meet applicable eligibility requirements of those programs, which typically require that some or all inclusionary units be provided on-site.	off-site or land-dedication must provide the required units or land within the geography of the Housing Opportunity Areas. Projects of 24 units or less also have the option of providing a 100% rent-controlled building instead of providing inclusionary units.
Height Bonus for Community Serving Uses and Micro-Retail	None	Projects may receive a square footage bonus for providing specific uses, which may be accommodated by adding up to 10' additional height: • Up to 2 additional feet of building square footage for every square foot provided of Community Serving uses (childcare, Legacy Business, displaced business, grocery, laundromat, nonprofit office, trade office). • Up to 1.5 additional feet of building square footage for every square foot provided of "micro-retail" spaces (measuring 100-1,000sf).
Unit Mix	Most rezoned areas (NC, C districts): 25% 2+ BRs bedrooms, including at least 10% 3+BRs (applicable starting at 10+ units). RTO and Van Ness & Market SUD: 35% 2+ BRs bedrooms, including at least 10% 3+BRs (applicable starting at 5+ units).	***As Introduced:*** Projects may instead meet 25% 2+BR or more through Local Program. Applicability is 5+ units. ***Note: Proposed for amendment by Planning Commission. See Department Recommendations for proposed amendments.***

Topic	Applicable Planning Code or Design Standard *(Under Current Zoning)*	Local Program "Automatic" flexibility *(i.e., "waivers" in Local Program; current as of July 29th ordinance – Board File 250701 v.2)*
Street-facing legislated and front setback	Required dimensions vary depending on legislated setbacks or zoning districts (RTO, RH, and RM, PUDs, etc.)	Projects on 19th Avenue may reduce legislated and front setback if sidewalk expands and is at least 15'.
Rear Yard	RH, RM-1, RM-2, RTO, RTO-M: 30% rear yard required All other Zoning Districts: 25% rear yard required	Rear yard (except in R districts) may be reduced to 18% of lot depth, or 15' whichever is greater; a corner lot's required rear yard may be reduced up to 18% of the lot area. In NC and C Districts, where otherwise not permitted, the ground floor is allowed 100% lot coverage.
Usable Open Space	Outside of Eastern Neighborhoods Mixed Use Districts, requirement varies from 36 square feet (SF) per dwelling unit (DU) to 300 SF/DU	***As Introduced:*** Reduced to 36 SF/DU **Common Usable Open Space:** 10' in horizontal dimension, min 100' SF **Private residential Usable Open Space:** 3' min horizontal dimension and 27' min SF. ***Note: Proposed for amendment by Planning Commission. See Department Recommendations for proposed amendments.***
Dwelling Unit Exposure	Dwelling units citywide must face an open area meeting one of the following: (1) A public street, public alley at least 20' in width, side yard at least 25' in width, or rear yard; if an outer court whose width is less than 25', then depth is no greater than its width; or (2) An unobstructed open area (whether an inner court or a space between separate buildings on the same lot) of no less than 25' in every horizontal dimension.	***As Introduced:*** **Up to 30%** of the units may meet a lower standard, providing exposure to "yards" or "courts" as defined by California Building Code (Ch. 12, Sec. 1205.2 & 1205.3). ***Proposed for amendment by Planning Commission. See Department Recommendations in the Executive Summary for proposed amendments.***

Topic	Applicable Planning Code or Design Standard *(Under Current Zoning)*	Local Program "Automatic" flexibility *(i.e., "waivers" in Local Program; current as of July 29th ordinance – Board File 250701 v.2)*
New ground floor non-residential use size limits	Use size cap varies from 2,000sf to 25,000sf depending on the zoning district.	No cap; no Conditional Use Authorization required.
Height limits for vertical non-habitable architectural elements	Height exceptions for non-habitable architectural elements are only available in Eastern Neighborhoods Mixed Use Districts, 85' height or less: • One element per lot; • Not to exceed 1,000 GFA • Element shall not have a plan dimension greater than 50'; • Element's height should not exceed 50% of the applicable height limit.	Allow an identical height exception for vertical non-habitable architectural elements on lots zoned for 85' or below.
Additional "catchall" flexibility	n/a	In addition to the options above, projects using the Local Program may seek an additional 15% reduction of any other quantitative Planning Code standard, with some exceptions.
Additional flexibility for 100% Affordable	Various Planning Code sections	100% affordable projects can use any of the incentives above, plus: • **Reduce active ground floor** requirement by **20%** • **Additional 20'** of height above Local Program height. • **Curb Cuts** restrictions in Section 155(r) shall not apply. • **Ground floor ceiling height** requirements in Section 145.1(c)(4) shall not apply.
Ministerial project review	Qualifying projects may opt to use state laws that enable ministerial review (e.g., SB423, AB2011, Housing Element low-income sites provision).	In addition to existing state ministerial programs, legislation will establish a new Housing Sustainability District (HSD), which will be available to projects using the Local Program.
Major modification	Per Planning Code 304, where not specified elsewhere in the code, a modification is possible on lots of at least ½-acre through a discretionary Planning	Projects of *any size* may choose to seek a **major modification** for any additional relief requested in excess of the pre-determined list and the 15% "catchall"

Topic	Applicable Planning Code or Design Standard *(Under Current Zoning)*	Local Program "Automatic" flexibility *(i.e., "waivers" in Local Program; current as of July 29th ordinance – Board File 250701 v.2)*
	Commission approval of a Planned Unit Development.	flexibility that are embedded into the Local Program.

RACIAL AND SOCIAL EQUITY ANALYSIS

The Family Zoning is a key implementation action of the Housing Element 2022 Update, which is San Francisco's first comprehensive housing plan that is centered on equity. Consistent with Planning Commission Resolution 20738, which requires that the Planning Commission center its work and decision-making in racial and social equity, the Department developed the **Racial and Social Equity Analysis: Family Zoning Plan** (Exhibit 2.d; referred to as "RSE Analysis").

The Family Zoning Plan project team considered and applied racial and social equity-minded practices while conducting outreach for the project, addressing community concerns, and iteratively developing the final proposal. The RSE Analysis completed by staff with support from Ground Works Consulting examines the impacts of the existing zoning in San Francisco's high-resource neighborhoods, recounts the history of exclusionary zoning and existing disparities in the city, describes the intentions of the Family Zoning Plan and the evidence to support them, and discusses expected positive outcomes of rezoning and considers actions to address any potential unintended consequences, many of which have been incorporated into the proposed legislation.

Crucially, the RSE Analysis affirms the Family Zoning Plan as a critical strategy to help undo policies that have created and reinforced patterns of economic and racial segregation, due to policies dating as far back as the early 20th century. By changing zoning rules to increase housing capacity, **the Plan will increase access to affordable and diverse housing types in the Housing Opportunity Areas**, whose characteristics have been shown by research to be associated with positive economic, education, and health outcomes for low-income families – particularly better long-term outcomes for children.

A few highlights from this robust analysis are presented below.

Part 2: Historical Patterns of Exclusion and Related Disparities

This section of the RSE Analysis includes an evaluation of spatial data and historical information to describe longstanding patterns of exclusion and its impacts on various socioeconomic disparities. **The analysis finds that the neighborhoods collectively encompassed by the Housing Opportunity Areas possess the following characteristics:**

- **Low housing production, limited housing options, and expensive housing**

  - Only 9% of new housing citywide was built there over the last 25 years, despite comprising more than 50% of the city's land area and 60% of parcels.
  - Home sales prices are 29% higher and rental prices are 28% higher than the median values in other parts of the city.
  - 66% of the parcels in the High Opportunity Areas that have housing on them are used for only single-family (58,500 parcels out of 89,000)—the most expensive and exclusive housing type. Single family homes tend to be 11-40% more expensive than condos and other multifamily housing types.

- **Residents are less diverse and more affluent**
  - More residents are white—49% compared to 29% in other neighborhoods.
  - Median household incomes are approximately 23% higher than the citywide median.
  - More residents are homeowners—46% compared to 32% in other neighborhoods.

- **Better health and education outcomes**
  - More residents have a college degree—70% compared to 50% in other neighborhoods.
  - Life expectancy is 4 years longer than in other neighborhoods.

Part 3: Potential Outcomes of the Proposal

This section provides a summary of research, data, and policy strategies that address four key topics where community members have expressed concerns about the proposed rezoning, including:

- Housing Affordability
- Residential Displacement
- Small Business Impacts
- Infrastructure and Community Services

Figure 6 below ("RSE Analysis – Potential Benefits and Unintended Consequences") presents the results of this analysis, describing the potential positive outcomes that could be realized by the proposed Family Zoning Plan, as well as possible negative or unintended consequences. As noted, this analysis has been conducted iteratively and in parallel with the development of the Family Zoning Plan legislation. It has helped shape the policy proposal itself and has highlighted critical topics for consideration during Plan implementation. This section of the full RSE Analysis (Exhibit 2.b, Part 3) also describes specific policies that can address some of these concerns, including existing policies (e.g. City or state policies), actions that are currently in the proposed Family Zoning Plan legislation, and other ideas for additional actions that could be pursued either with the rezoning or through separate actions.

Figure 6: RSE Analysis – Potential Benefits and Unintended Consequences

RSE Topic	Potential Benefits of Rezoning	Potential Unintended Consequences of Rezoning
HOUSING AFFORDABILITY	• **Updating land use regulations to add more housing generally has a positive, yet moderate, impact on affordability** for housing in the general market, which is how the vast majority of households of all incomes acquire housing. Multi-family housing, enabled through the rezoning, also tends to be more affordable to more households than single family homes. • Allowing for larger building sizes through the rezoning will make 100% affordable housing developments more feasible in places they were not previously. Further, the development of **new market rate housing will generate fee revenues and build units that will grow the deed-restricted affordable housing stock**.	• It is not guaranteed that rezoning will result in more development in the short term, nor that developing more housing in the Housing Opportunity Area will significantly lower prices in the near term, particularly given extremely high demand for housing combined with **current economic conditions which make many housing types infeasible to build**.
RESIDENTIAL DISPLACEMENT	• Adding housing to the Housing Opportunity Areas, especially subsidized affordable units, has the potential to **help low-income and middle-income households and households of color move to the Housing Opportunity Areas** and help to **reduce displacement pressures** for existing residents. • The **Tenant Protections Ordinance** will work in conjunction with other tenant protection policies to **deter developers from displacing tenants and demolishing existing housing**. In practice, these policies direct developers to focus development efforts on "soft sites" without existing housing, such as parking lots.	• **If rents stay high, rather than stabilize or slightly decrease as expected, there will continue to be displacement pressures** (which are primarily due to causes like Ellis Act, owner move-ins, capital improvements, or other causes of eviction), and people could be displaced before they can benefit from increased housing supply. • Renters who are more susceptible due to age, disability status, language ability, or socio-economic status, may face **challenges navigating the existing systems** and resources designed to protect them from displacement.

RSE Topic	Potential Benefits of Rezoning	Potential Unintended Consequences of Rezoning
SMALL BUSINESS	• **More housing will support small businesses** by increasing their customer base, and by making it easier for employees and owners to live nearby. • The **proposed micro-retail spaces will create more affordable or right-sized options for small businesses**, and the inclusion of the RTO-C zoning district will expand the available area in the city where commercial uses are allowed. • **Early notification** of development applications will give OSB more time to work with the impacted business to explore options including negotiating the ability to return, seeking a different site, exploring a different business model, or otherwise planning for the next phase of the business. • **Financial resources and simplifying the requirements** for relocating a displaced business can help businesses impacted by the rezoning stay afloat.	• A small number of businesses, particularly those in buildings without residential units, **may face closure if their building is proposed for new developments** (though it is worth noting that the majority of new housing is not proposed on sites with existing storefronts). They may also experience decreased sales or other negative impacts if they are located near housing construction.
INFRASTRUCTURE & COMMUNITY SERVICES	• **More people will benefit from neighborhoods that already have access to good schools, open space, lower pollution, and essential infrastructure and community services.** For most types of infrastructure, City agencies project that there is sufficient capacity to accommodate new growth for approximately the next two decades . • **Dense, new development will be more energy and water efficient** and can reduce a household's need to drive, which can benefit the environment as well as household budgets.	• In the longer term, in cases where demand will outpace the capacity of infrastructure and services, a larger population could reduce the quality and access to services for existing residents if future investments and service expansions are unable to keep up. **This may be particularly impactful for low-income residents** who rely on specific programming, public transit, and services provided by nonprofits and community-based organizations.

RSE Topic	Potential Benefits of Rezoning	Potential Unintended Consequences of Rezoning
	• **New residents and new developments can increase City revenues** (e.g., via impact fees, property taxes, sales taxes, etc.) to reinvest in infrastructure and services, both offsetting the impacts of growth and improving service to existing residents.	

OTHER CITY COMMISSIONS

The Department has made several presentations at the **Youth Commission**, the **Small Business Commission**, and the **Historic Preservation Commission**. Relevant correspondences from these commissions are attached in Exhibit 6.a ("Responses from Other City Commissions").

The **Youth Commission** discussed the Family Zoning Plan at two informational hearings, and **adopted two resolutions in support of the Family Zoning Plan**. Generally, Commissioners acknowledged the need for more housing opportunities, particularly for young people and families, and welcomed the focus on affordable, family-sized housing. They stressed the need for strong tenant protections, including a "right to return" if redevelopment occurs, and also asked questions about historic preservation. They also asked how the City will ensure housing is actually built and how progress will be tracked.

On May 19, 2025, the Commission adopted a resolution supporting the Expanding Housing Choice Plan while urging that any zoning changes include strong tenant protections, particularly the right to return for families displaced by development. On June 16, 2025, it adopted a second resolution supporting new housing but calling for safeguards to prevent displacement of small businesses that provide jobs, culture, and community stability for youth and families. Together, the resolutions highlight the Commission's commitment to expanding affordable housing while ensuring that tenants and small businesses are not left behind.

The **Small Business Commission** discussed the legislation at three hearings, and the introduced legislation was forwarded to them for review and to make recommendations related to the Plan's potential impacts on small businesses. On August 25, 2025, the **Commission voted to support the legislation**, making the following recommendations:

- Codify a notification process to commercial tenants and the Office of Small Business when a development application on a rezoned site is submitted to the Planning Department,
- Track small business displacement under the rezoning plan,
- Codify incentives for development projects that include warm shell buildouts in new commercial

spaces,

- Explore statewide advocacy to support commercial relocation assistance; and,
- Explore incentives for development projects to make contributions to a small business mitigation fund.

The **Historic Preservation Commission** heard informational on the Plan at three calendared hearings. At the September 3, 2025 hearing, the Commission **voted to direct the HPC President to develop a letter to the Planning Commission** sharing various recommendations on how to strengthen the policies and incentives related to historic preservation in the Family Zoning Plan. This letter is expected to be sent to the Commission in advance of the Adoption hearing on September 11th.

OTHER LEGISLATIVE ISSUES FOR CONSIDERATION

In addition to the recommended modifications, the Department considered, but are not recommending, numerous other possible amendments to the ordinances that the Commission or Board of Supervisors could potentially consider, such as to create additional options for development, study different height and/or density proposals, or refine other aspects of the proposed Family Zoning Plan. These other issues for consideration are listed in Exhibit 2.a ("*Other Legislative Issues for Consideration*").

Public Comment

Exhibit 6.b ("Public Comment Letters") provides an overview of public comment letters that have been received on the Family Zoning Plan, primarily since the legislation introduction on June 24, 2026. The following summarizes this recent public comment:

The Planning Department has received seven organizational letters of support for the San Francisco Family Zoning Plan, from a broad array of civic, business, and affordable housing organizations, including the Chamber of Commerce, Bay Area Council, SPUR, Sierra Club, Golden Gate Restaurant Association, BOMA, Hospital Council, AdvanceSF, MidPen Housing, Mission Housing, and the SF District Benefit District Alliance. Supporters emphasized that the Plan will expand housing opportunities for families, increase density near transit and commercial corridors, and strengthen neighborhood vitality. Business and community groups also highlighted the plan's role in supporting the local workforce, small businesses, and long-term economic resilience. Collectively, the letters underscore widespread recognition that the plan advances affordability, inclusivity, and quality of life for San Francisco families.

The Planning Department also received 18 individually-written letters and 4 form letters in support of rezoning. These letters generally tended to focus on the importance of building more housing to alleviate San Francisco's housing crisis. They also noted that increasing heights and development capacity would make these neighborhoods more inclusive, thus making the rezoning important from an equity perspective.

In total, we received 25 individually-written letters and 327 form letters opposing the rezoning. These letters generally make claims that the rezoning would incentivize mass demolition, displacement of renters and small businesses, and the unchecked spread of luxury high-rises across San Francisco. These letters also make claims that the plan lacks affordability guarantees, tenant protections, or meaningful community input, framing it as a giveaway to developers and investors rather than a solution to the city's housing needs. The form opposition letters also characterize the rezoning as a blanket upzoning approach, warning it will fuel speculation, gentrification, and irreversible neighborhood change. They call on the Planning Commission to scale back or postpone the plan, prioritize tenant and small business protections, and pursue community-driven alternatives.

We received several dozen emails from other groups and individuals that voiced neither total support nor opposition to the rezoning, but included a mix of technical zoning inquiries, parcel-specific questions, and concerns and questions about a range of topics including height limits, affordability, tenant protections, and funding. Some of the letters provided feedback on specific geographies, including requests to lower heights in certain areas, shift housing growth to other areas, or to add additional height or density in certain areas. Several messages also requested meetings or clarification on hearing times, while a smaller number offered specific policy suggestions.

Attachments

Exhibit 1. Proposed Family Zoning Map (July 2025)

Exhibit 2. Issues for Consideration & Communications

a. Other Legislative Issues for Consideration
b. Factsheets (September 2025)
    i. What is the Family Zoning Plan?
    ii. Family Zoning Plan and Small Business
    iii. State and Local Tenant Protections
c. Rezoning Visualizations (for illustrative purposes only)
d. Racial and Social Equity Analysis: Family Zoning Plan (September 2025)

Exhibit 3. Planning, Business, and Tax Regulation Code Amendments

a. Planning, Business, and Tax Regulation Code Amendments Draft Resolution
b. Planning, Business, and Tax Regulation Code Amendments Draft Ordinance
c. Summary of Planning, Business, and Tax Regulation Code Amendments

Exhibit 4. Zoning Map Amendments

a. Zoning Map Amendments Draft Resolution
b. Zoning Map Amendments Draft Ordinance[8]

[8] The full Zoning Map Amendments Parcel Tables are available online on Legistar under File 250700.

c. Zoning Maps by Supervisor District (for illustrative purposes only)

Exhibit 5. General Plan Amendments

a. General Plan Amendments Draft Resolution
b. General Plan Amendments Draft Ordinance
c. Urban Design Element Map 04 – Urban Design Guidelines for the Height of Buildings
d. Overview of Area Plans that Overlap with the Family Zoning Plan

Exhibit 6. Other Commissions & Public Comment

a. Responses from Other City Commissions
b. Public Comment Letters

Exhibit 7. Local Coastal Program Consistency Findings

Exhibit 8. Addendum No. 1 to the Housing Element 2022 Update FEIR

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PLANNING COMMISSION RESOLUTION NO. 21784

HEARING DATE: July 17, 2025

Project Name:	Family Zoning Plan (Housing Element Rezoning Program)
Case Number:	2021-005878GPA
Initiated by:	Planning Department Staff
Staff Contacts:	Lisa Chen, Principal Planner lisa.chen@sfgov.org, 628-652-7422
Reviewed by:	Rachael Tanner, Director of Citywide Planning Rachael.tanner@sfgov.org, 628-652-7471

ADOPTING A RESOLUTION OF INTENT TO INITIATE AMENDMENTS TO THE SAN FRANCISCO GENERAL PLAN, PURSUANT TO SECTION 340, IN RELATION TO IMPLEMENTATION OF THE HOUSING ELEMENT 2022 UPDATE AND ADOPTION OF THE SAN FRANCISCO FAMILY ZONING PLAN, INCLUDING AMENDMENTS TO THE URBAN DESIGN ELEMENT, COMMERCE AND INDUSTRY ELEMENT, TRANSPORTATION ELEMENT, THE BALBOA PARK STATION AREA PLAN, THE GLEN PARK COMMUNITY PLAN, THE MARKET AND OCTAVIA AREA PLAN, THE NORTHEASTERN WATERFRONT PLAN, THE VAN NESS AVENUE AREA PLAN, THE WESTERN SOMA (SOUTH OF MARKET) AREA PLAN, THE WESTERN SHORELINE AREA PLAN, THE DOWNTOWN AREA PLAN, AND THE LAND USE INDEX.

WHEREAS, Section 4.105 of the Charter of the City and County of San Francisco provides that the Planning Commission ("Commission") periodically recommend General Plan Amendments to the Board of Supervisors; and

WHEREAS, the General Plan consists of goals, policies and programs for the future physical development of the City and County of San Francisco that take into consideration social, economic and environmental factors; and

WHEREAS, the General Plan shall be periodically amended in response to changing physical, social, economic, environmental or legislative conditions; and

WHEREAS, Planning Code Section 340 provides that an amendment to the General Plan may be initiated by the Commission; and

WHEREAS, On January 31, 2023 the Board of Supervisors adopted Ordinance No. 010-23, which amended the San Francisco General Plan by establishing a completely revised Housing Element ("Housing Element 2022 Update"). The Housing Element 2022 Update was prepared pursuant to Government Code 65583, which, in part, requires that the Housing Element provide: (a) an assessment of housing needs and an inventory of resources and constraints relevant to the meeting these needs; (b) a statement of community's goals, quantified objectives, and policies relative to affirmatively furthering fair housing and to the maintenance, preservation, improvement, and development of housing; and (c) a schedule of actions during the planning period to achieve the goals and objectives of the Housing Element, including the need to revise certain General Plan objectives and policies and rezone portions of the City to increase development capacity to meet the City's housing needs; and

WHEREAS, As required by the Housing Element 2022 Update, the Planning Department has embarked on a multi-year community-based planning effort to revise land use policies and the Planning Code and Zoning Maps to assure sufficient and equitable development capacity to create a variety of housing types in areas of the City that are particularly well suited to accommodate additional housing. This rezoning effort is commonly referred to as the "San Francisco Family Zoning Plan" ("Family Zoning Plan"). As called for in the Housing Element 2022 Update, the Family Zoning Plan focuses on the well-resourced neighborhoods of the western and northern portions of San Francisco (also referred to as Housing Opportunity Areas); and

WHEREAS, The General Plan Amendments, together with proposed Zoning Map Amendments and Planning Code Amendments, provide a comprehensive set of policies to implement key actions of the Housing Element 2022 Update; and

WHEREAS, The Proposed General Plan Amendments would amend certain objectives, policies and maps of the Urban Design Element, Commerce and Industry Element, Transportation Element, the Balboa Park Station Area Plan, the Glen Park Community Plan, the Market and Octavia Area Plan, the Northeastern Waterfront Plan, the Van Ness Avenue Area Plan, the Western SoMa (South of Market) Area Plan, the Western Shoreline Area Plan, the Downtown Area Plan, and the Land Use Index, to align these Area Plans and Elements with the Housing Element 2022 Update and the Family Zoning Plan; and

WHEREAS, The Commission conducted a duly noticed public hearing at a regularly scheduled meeting to consider initiation of the proposed Ordinance on July 17, 2025; and

WHEREAS, a proposed Ordinance has been drafted in order to make the necessary amendments to the General Plan to implement the Family Zoning Plan. The Office of the City Attorney has approved the Proposed Ordinance as to form; and

WHEREAS, the Commission certified the Housing Element 2022 Update EIR on November 17, 2022 and adopted CEQA findings for the Housing Element Update in December 2022. This General Plan Amendment initiation would not, in and of itself, result in a physical change to the environment, and is not an approval of the proposed General Plan Amendments or of the Family Zoning Plan. Therefore, this action is not considered a project under the California Environmental Quality Act. The

Planning Department is currently preparing an addendum to the EIR, which will be completed prior to the Commission taking action on the subject General Plan Amendments; and

WHEREAS, the Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of Department staff and other interested parties; and

WHEREAS, all pertinent documents may be found in the files of the Department, as the custodian of records, at 49 South Van Ness Avenue, Suite 1400, San Francisco; and

WHEREAS, the Commission has reviewed the proposed Ordinance; and

NOW, THEREFORE BE IT RESOLVED, that pursuant to Planning Code Section 340(c), the Commission adopts this Resolution of Intent to initiate amendments to the General Plan;

AND BE IT FURTHER RESOLVED, that pursuant to Planning Code Section 333, the Commission authorizes the Department to provide appropriate notice for a public hearing to consider the above referenced General Plan amendments substantially in the same form as in the draft ordinance, approved as to form by the City Attorney in Exhibit A, to be considered at a publicly noticed hearing on or after September 11, 2025.

I hereby certify that the foregoing Resolution was ADOPTED by the Commission at its meeting on July 17, 2025.

Jonas P Ionin Digitally signed by Jonas P Ionin
Date: 2025.07.31 08:55:18 -07'00'

Jonas P. Ionin
Commission Secretary

AYES: Campbell, McGarry, Braun, Imperial, So

NOES: Moore, Williams

ABSENT: None

ADOPTED: July 17, 2025

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

NOTICE OF ELECTRONIC TRANSMITTAL

DATE: October 16, 2025

TO: Angela Calvillo, Clerk of the Board of Supervisors

FROM: Ryan Shum, Environmental Review Coordinator, (628) 652-7542 or ryan.shum@sfgov.org

RE: Environmental Review for the Family Zoning Program
Board Files 250700, 250701, and 250966

In compliance with San Francisco's Administrative Code Section 8.12.5 "Electronic Distribution of Multi-Page Documents," the Planning Department is submitting a link to the Final Environmental Impact Report (FEIR) for the 2022 Housing Element Update and Addendum No. 1 to the FEIR for the Family Zoning Program documents in digital format to the Clerk of the Board for distribution to the members of the board of supervisors. In addition, enclosed are a memo addressing public comments on the addendum as well as analysis of the modifications to the zoning program provided in substitute legislation on September 30, 2025.

The Land Use and Transportation Committee of the Board of Supervisors will hold a hearing on the Family Zoning Program on October 20, 2025. These environmental documents are associated with Board Files 250700, 250701, and 250966. For questions regarding the environmental review for this project, please contact Ryan Shum at the above contact information.

Links: Housing Element FEIR - Vol. 1
Housing Element FEIR – Vol. 2
Housing Element FEIR – Vol. 3
Addendum No. 1 to the Housing Element FEIR

All documents related to the environmental review of the Housing Element Update and Family Zoning Program are available at: https://sfplanning.org/environmental-review-documents?title=housing+element&field_environmental_review_categ_target_id=All&items_per_page=10

Enclosures

1. Memorandum: Responses to Public Comments on the Environmental Review of the Family Zoning Plan – Housing Element Rezoning Program
2. Memorandum: CEQA Analysis for Family Zoning Plan – Substitute Legislation (Version 3)

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
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MEMORANDUM

Date: October 16, 2025
To: San Francisco Board of Supervisors
From: Lisa Gibson, Environmental Review Officer – lisa.gibson@sfgov.org , (628) 652-7571
Debra Dwyer, Principal Planner – debra.dwyer@sfgov.org, (628) 652-7576
Ryan Shum, Senior Planner – ryan.shum@sfgov.org, (628) 652-7542

RE: **Responses to Public Comments on the Environmental Review of the Family Zoning Plan – Housing Element Rezoning Program**
Planning Case Nos. 2019-016230ENV, 2021-005878CWP, and 2021-005878GPA
Board file nos. 250700, 250701, and 250966

Introduction

The purpose of this memorandum is to respond to questions and concerns raised in public comments on the September 3, 2025, Addendum No. 1 to the Housing Element 2022 Update Final Environmental Impact Report (FEIR), which addressed the Family Zoning Plan (rezoning program). Although neither the California Environmental Quality Act (CEQA) nor chapter 31 of the San Francisco Administrative Code establish a public comment period or require written responses to comments on an addendum, the San Francisco Planning Department (department) has prepared this memorandum to inform the Board of Supervisors (board) and the public that the department has carefully considered the comments received and finds that the addendum is the appropriate environmental review document for the rezoning program, pursuant to CEQA and chapter 31.

The department published Addendum No. 1 to the Housing Element Final Environmental Impact Report (addendum) on September 3, 2025, pursuant to CEQA, specifically California Public Resources Code section 21166 and CEQA Guidelines sections 15162–15163, for the rezoning program. The Planning Commission (commission) heard the rezoning program on September 11, 2025, and recommended approval with modifications to the board. Members of the public submitted written comments to the board and the commission prior to the commission hearing and also orally at the commission hearing. Additional public comments have been submitted to the board and the department since the commission hearing.

CEQA Requirements for an Addendum

When a FEIR has been certified for a project, CEQA and the CEQA Guidelines state that no new, subsequent, or supplemental FEIR shall be required unless one or more of the following events occurs:

(1) Substantial changes to a project are proposed that will require major revisions to the FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes will occur with respect to the circumstances under which the project is being undertaken, requiring major revisions to the previous FEIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known at the time the FEIR was certified, has become available. (See CEQA section 21166 and CEQA Guidelines sections 15162–15163.)

The Housing Element FEIR analyzed the indirect effects of housing element implementation including rezoning to accommodate the City's RHNA and future housing development in the City. None of the events listed above has occurred as substantiated below; therefore, an addendum to the Housing Element FEIR is the appropriate level of environmental review.

The California Supreme Court has determined that the legal standard of review of an addendum to an EIR is substantial evidence in the record, and that a lead agency's decision of whether or not to prepare a subsequent EIR after one has already been certified for a project depends on whether the EIR still retains relevant information for the project.[1] As noted in the addendum, the Housing Element FEIR still retains information relevant to environmental review of the rezoning program, and substantial evidence supports the department's decision to prepare an addendum to the FEIR for the rezoning program.

Approach to Analysis of Rezoning Program

Broadly, many of the comments contend that the rezoning program would result in new significant impacts that were not analyzed in the Housing Element FEIR considering differences in the assumptions for where housing growth could occur due to increased height limits and removal of density limits (known as form-based density). As a result, the commenters state that a new or subsequent FEIR should be prepared. For the reasons provided below, an addendum is the appropriate environmental review document for the rezoning program as the rezoning program would not result in any new or substantially more severe significant impacts, or result in the need for new mitigation measures.

As detailed in the addendum, the FEIR adequately disclosed all significant impacts that would result from the anticipated rezoning program and subsequent housing development. The FEIR mitigation measures remain effective to reduce the significant impacts that would result from future development consistent with the rezoning program, though they would not eliminate all significant impacts, as disclosed in the FEIR and the addendum.

The FEIR acknowledged that the housing element itself would not result in direct physical impacts on the environment. However, the FEIR noted that indirect effects of adopting the housing element would include future rezoning programs primarily in the well-resourced areas, but not limited to them, to accommodate

1 *Friends of the College of San Mateo Gardens v San Mateo County Community College Dist*. (2017) 11 CA5th 596, 603

the City's regional housing needs allocation (RHNA). Further, the FEIR disclosed that at the time the 2022 housing element update was being considered, the specific rezoning actions had not been developed in detail, and therefore the FEIR presented a representative analysis of the locations where the resulting housing development could occur.

As such, the FEIR and the addendum present an inherently representative analysis of impacts, and minor changes in the location of actual growth within the well-resourced areas of the city would not automatically constitute a new significant impact. Incremental new growth adjacent to well-resourced areas and taller building heights similarly do not necessarily constitute a new significant impact, as the impacts resulting from taller buildings or future housing development in different areas would be substantially similar to the impacts disclosed in the FEIR. In addition, the FEIR indicated that an increased share of the city's future housing growth would occur within, *but would not be limited to*, well-resourced areas (FEIR Responses to Comments, p. 2-1).

Furthermore, the housing growth distribution analyzed in the FEIR was described as a hypothetical scenario and not indicative of the final zoning proposal:

> "The impact analysis in the EIR is based on…representative future conditions, [and] the depictions are not intended to be precise maps of where future development would occur. Rather, the depictions are used to identify the types and magnitude of impacts anticipated from the increased density and redistribution of housing growth under the proposed action compared to the 2050 environmental baseline." (FEIR, p. 1-4)
>
> "[The project description figure] presents one possible distribution of future housing development growth that could occur and informs the programmatic environmental impact analysis presented in the EIR. While the impact analysis in the EIR is based on these representative future conditions, future housing development could occur in any areas of the city where zoning allows." (FEIR, p. 4-5)

That is, the FEIR impact conclusions are based upon a representative analysis and do not apply to only one specific growth and height distribution. The purpose of the FEIR was to disclose the reasonably foreseeable impacts of constructing approximately 50,000 new housing units throughout the city, primarily in the well-resourced areas of the city, but not limited to those areas and not necessarily in the exact locations depicted in the EIR. Furthermore, as clarified in the FEIR, the boundary of the well-resourced area(s) of the city is not static and changes from year to year (FEIR, p. S-2).[2]

While the distribution of housing growth in the rezoning program differs from the scenario analyzed in the FEIR and proposes slightly more units than originally contemplated, the additional analysis conducted for the proposed rezoning program, as documented in the addendum, confirmed that the representative analysis from the FEIR remains valid and that the rezoning scenario would not result in new or substantially more severe environmental impacts that were not already disclosed in the EIR.

[2] California Tax Credit Allocation Committee. *CTCAC/HCD Opportunity Area Maps*. Published December 2024. Accessed October 1, 2025.

Further responses below address why further environmental analysis is not required as a result of changed circumstances or new information of substantial importance and also address comments regarding consistency with the general plan, Senate Bill 131, and housing sustainability districts.

As described in more detail below, a new or subsequent FEIR for the rezoning program is not required.

No New or Substantially More Severe Significant Impacts

Comments related to the adequacy of the addendum state that the rezoning program would result in new and/or more severe significant impacts because it proposes new growth and/or new height limits in areas of the city that were not explicitly depicted in the FEIR. However, as previously discussed, the FEIR presents a programmatic analysis that considered the reasonably foreseeable impacts of constructing 50,000 new housing units primarily within, but not limited to, the well-resourced areas of the city. The FEIR acknowledged that future implementation actions such as rezoning to increase housing capacity in the city and future development consistent with the Housing Element would result in significant and unavoidable impacts related to:

- Built-environment historic resources,
- Transportation (construction, public transit delay and loading),
- Noise (construction and operation),
- Air quality (criteria air pollutant emissions and health effects),
- Wind,
- Shadow, and
- Utilities and service systems.

Effective mitigation measures were identified to reduce impacts to the extent feasible. The FEIR acknowledged that impacts for these topics would be significant and unavoidable even with mitigation. In addition, the FEIR found certain impacts, such as liquefaction hazards and hazardous materials, to be less than significant due to existing regulations that would be complied with as applicable.

The department analyzed the proposed rezoning program and evaluated its impacts in comparison with the impacts identified in the FEIR and documented its conclusions in the addendum. Below is a summary of why the rezoning program would not result in new or substantially more severe impacts for the topics raised in the comment letters.

Wind and Shadow

With regards to impacts related to taller building heights, including wind and shadow, the addendum acknowledged that taller and denser development in certain areas of the city would likely result in significant wind and shadow impacts. However, because the FEIR impact findings are programmatic and not specific to one particular area of the city, these impacts would be similar to those that were discussed in the FEIR and there would not be new or substantially more severe wind and shadow impacts.

Both the FEIR wind and shadow discussions are representative analyses that indicate the range of wind and shadow impacts that could occur across the city with implementation of the housing element update. Key areas were selected based on a variety of factors such as geography and neighborhood building heights to

represent the nature and severity of impacts based on the hypothetical height map, but the impacts could occur in any part of the city and would not be limited to only the key areas. See FEIR pp. 4.7-9 to 4.7-13 in the wind section and FEIR p. 4.8-18 to 4.8-42 in the shadow section for more information.

Mitigation measures were identified to minimize wind and shadow impacts from future development, and these mitigation measures would apply to future development at the time that they are proposed, if applicable. The mitigation measures require site- and project-specific analysis and incorporation of building features to reduce wind and shadow impacts to the extent feasible. The changes to growth distribution and building heights in the proposed rezoning program would not result new or more severe wind and shadow impacts that were not already discussed, and the same mitigation measures to reduce impacts would continue to apply.

With respect to the change from a one-hour to a nine-hour per year wind hazard standard, the addendum noted the policy reasons for the modification (see addendum pp. 102 to107). Namely, the policy change would remove a constraint for housing development by easing the ability of housing projects to comply with the wind standards more quickly and with less cost, consistent with housing element policies. The change would not modify the 26 miles per hour (mph) equivalent threshold of a wind hazard.

Notably, even with modification of the standard, any project over 85 feet would still be required to conduct a wind tunnel test to determine if there is potential for hazardous winds, consistent with current practice, and projects would need to incorporate wind-reducing features to address net new hazard exceedances of nine or more hours in a year. The addendum acknowledged that the change *may* lead to accelerated ground-level winds for one to eight hours *per year* in a location. But, on average over the course of a year, a wind hazard exceedance of less than nine hours would not substantially harm pedestrians, and the one-hour per year wind hazard criterion was overly conservative. Therefore, modification of the wind hazard criterion from one to nine hours would not result in a new or more significant impact than was previously disclosed in the FEIR.

Built-Environment Historic Resources

The FEIR impact analysis on built-environment historic resources was also programmatic and representative. As discussed on FEIR p. 4.2-77, the growth projections illustrate possible future conditions and are not intended to be precise depictions of where future development could occur. Rather, the analysis identifies the types and magnitude of impacts that could occur to both known and forecasted built-environment historic resources. Not all built-environment historic resources that could be identified between present day and 2050 are known, as new historic resources may be identified in the future. Therefore, the EIR established a projection, or forecast, that anticipated how the city's built-environment historic resources setting will evolve over the next approximately 30 years while development implements the policies of the adopted housing element. Environmental impacts are assessed against a forecast rather than the current setting, which contains only a portion of the resources that could be affected through 2050. The impact analysis is representative in that a range of representative scenarios that could occur with future housing projects that involve a historic resource were described and considered in making an overall impact conclusion. Specifically, the EIR considered a range of outcomes for types of housing projects that may impact the range of known and forecasted built-environment cultural resource identified within San Francisco, see Table 4.2-7 (Summary of Housing Project Types Anticipated for Future Development Consistent with Housing Element Update and Anticipated Impacts prior to Application of Mitigation [Revised])on FEIR pp. 4.2-85 and 86. The

EIR analysis disclosed the scope and magnitude of impacts to built-environment historic resources, including both individual resources and historic districts.

Thus, the FEIR analyzed the impact of future development on built-environment historic resources at a citywide, programmatic level, and identified 12 mitigation measures (Mitigation Measures M-CR-1a through M-CR-1l) that would apply to future housing projects that adversely affect historic resources. At the time that these development projects are proposed, they would be required to undergo project-level environmental review as applicable to determine which mitigation measures would apply and what specific measures would be required based on the project scope and design and the specific historic resource(s) that would be affected.

Topics addressed through Regulations

For some environmental resource topics, significant impacts would not occur due to the reliance on existing regulations. Projects throughout the city must comply with these regulations, as applicable. Therefore, contrary to commenter statements, changes to the location, density and height of housing development would not result in new or substantially more severe impacts due to compliance with regulations described below.

Geology and Soils Impacts – Liquefaction Hazards

The FEIR determined that future housing development would result in less than significant impacts related to geology and soils. No mitigation measures related to geology and soil impacts were identified and would be required of future construction. Future housing development enabled by the Housing Element and future rezoning programs would be required to comply with state and local building codes and conduct site-specific geotechnical reports by a qualified licensed engineer at the time they are proposed. Pursuant to the Seismic Hazards Mapping Act of 1990 (Public Resources Code, Chapter 7.8, Section 2690-2699.6), projects located within a seismic hazard zone, including for liquefaction hazard, are required to specifically identify measures needed to protect life and property from seismic hazards. There have been no substantive changes to the geotechnical regulatory requirements since the EIR. Thus, taller buildings in certain parts of the City would not alter the conclusion of the FEIR or result in new or substantially more severe impacts.

Hazardous Materials

The FEIR determined that future housing development would result in less than significant impacts related to hazardous materials. As discussed in the FEIR, all projects in the city that disturb more than 50 cubic yards of soil on sites with potentially hazardous soils or groundwater are subject to the Maher Program, which is overseen by the health department. Construction and transportation of hazardous materials are also regulated by the state. All projects are required to comply with the Maher Program and mitigate any potential hazardous material impacts to less-than-significant levels prior to building construction and occupancy.

Biological Resources

The FEIR determined that future housing development would result in less than significant impacts related to biological resources. Biological resources in the city are protected at the federal, state, and local levels through existing regulations and no further mitigation measures are required to reduce potential impacts. For example, the city has adopted regulations for bird-safe designs within the city. Planning code section 139, Standards for Bird-Safe Buildings, establishes building design standards to reduce bird strikes and avian mortality rates. Compliance with planning code section 139 is required, applies city-wide, and would ensure that impacts related to bird hazards would be less than significant.

Changed Circumstances and New Information

As described below, there are no new significant impacts nor a substantial increase in the severity of identified significant impacts due to changed circumstances or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence, at the time the Housing Element FEIR was certified as complete.

Great Highway Closure (Public Transit Delay)
The addendum notes the Great Highway road closure and acknowledges that its closure has diverted additional vehicles onto nearby roadways, including 19th Avenue. This change results in additional travel time for nearby public transit routes such as the Muni 28/28R. However, the diverted vehicle volume is not so substantial such that there would be a significant increase in transit delay on the previously identified significant impact on the 28/28R. As shown in Table 6 (addendum p. 76), there would not be a substantial increase in transit travel time on the 19th Avenue corridor during both the AM and PM peak hours under the proposed rezoning program. Furthermore, the San Francisco Municipal Transportation Agency (SFMTA) is working on signal timing upgrades and improvements at key bottlenecks to improve traffic flow and transit operations in the area.[3] For these reasons, the closure of the Great Highway is not a change in circumstance that would result in new or more significant impacts, and no new or subsequent FEIR is required.

Air Pollutant Exposure Zone (Air Quality and Health Risk)
As acknowledged in the addendum, the air pollutant exposure zone (APEZ) map was updated following the publication of the housing element EIR. The most recent update added areas of the city to the APEZ. The expansion of the APEZ map is not a change in circumstance that would result in new or substantially more severe air quality impacts because it would not worsen air quality impacts. In fact, the map update is more protective compared to the prior APEZ map because more future housing development would be subject to the protective mitigation measures required to be implemented when constructing within the APEZ, including incorporation of enhanced ventilation for sensitive use developments such as residential projects. Additionally, the expansion of the map is not new information because the APEZ map and fact that it is updated every five years was known at the time of the EIR. The expansion of the APEZ map does not meet the definition of new information of substantial importance as defined in CEQA Guidelines section 15162, noted above.

Consistency with the General Plan

Commenters claim that that the general plan protects historic districts such as North Beach and Telegraph Hill and priority equity geographies from development, and therefore the rezoning is inconsistent with the general plan. The commenters do not specify which specific general plan policy the rezoning is inconsistent with. Additionally, one commenter claims that the rezoning would exceed the height and density limits set forth in the general plan. The general plan, which includes the housing element, is a long-term vision document with a policy framework and plan to guide policy and decision-making in the city. The general plan does not include specific height or development parameters such as housing density or land use, as these are regulated by the city's planning code and zoning map, which implements the general plan.

[3] San Francisco Municipal Transportation Agency. "New Data on Great Highway Road Closure: How We're Supporting Your Trips." Available at: https://www.sfmta.com/blog/new-data-great-highway-road-closure-how-were-supporting-your-trips. Accessed October 2, 2025.

With regards to development in historic districts and priority equity geographies, there are no general plan policies that preclude development in any part of the city, including in historic districts or priority equity geographies. The general plan has policies for the city to consider and develop policy to address specific community needs and goals, but the policies do not comprehensively prohibit development in historic districts or priority equity geographies.

The commission found that the rezoning program is consistent with the general plan, for the reasons set forth in the Resolution recommending adoption of the program for approval by the board (Resolutions 21808-21810.). Specifically, the commission found that the rezoning program is, on balance, consistent with general plan policies. The comments do not specify which general plan policies the rezoning program is in conflict with and it is unclear how the rezoning program is inconsistent with the general plan.

Senate Bill 131

One commenter claims that SB 131 does not apply to the rezoning program. SB 131 establishes a statutory exemption from CEQA for rezoning programs meeting specified criteria. The rezoning program qualifies for an addendum under CEQA and the discussion regarding SB 131 is provided in the addendum primarily for informational purposes. The addendum acknowledged that SB 131 would not apply to natural and protected lands and thus separate environmental review (i.e., the two-pronged approach noted in the addendum) would be required for parcels within the rezoning program that are located on natural and protected lands, as defined, were the department to rely upon SB 131, which it does not. The addendum acknowledges that presenting a two-pronged approach could be confusing for decision makers and the public, and thus the department elected to undertake a singular approach (i.e., the addendum). Nonetheless, a lead agency's decision to prepare an addendum for a project does not preclude the project's eligibility for applicable statutory exemptions. Nothing in SB 131 precludes the use of the statutory exemption for a rezoning of parcels that are not natural or protected lands.

Housing Sustainability Districts

Contrary to the assertions of some comments, the Housing Element FEIR discusses housing sustainability districts throughout the document and identifies areas that could be designated as a housing sustainability district (see "Housing Sustainability District" section starting on FEIR p. 2-27 and Figure 2-8 "Areas of the City Under Consideration for Possible Housing Sustainability Districts"). The addendum also includes a figure comparing the areas which the FEIR identified as potential housing sustainability district areas versus what is ultimately being proposed (see addendum Figure 1). Establishment of a housing sustainability district creates a streamlined ministerial process for project approval. Development that could occur within the district is accounted for within the 54,000 units anticipated under the rezoning program. Therefore, the FEIR and addendum adequately address the physical impacts associated with the housing sustainability district.

Conclusion

This memorandum demonstrates that the department has carefully considered the comments received and provides further substantial evidence that the FEIR addendum is the appropriate environmental review document for the rezoning program pursuant to CEQA and chapter 31.

The Housing Element FEIR analyzed a hypothetical rezoning scenario of future housing growth in the city. The FEIR acknowledged that the height and growth distribution depicted in the FEIR was hypothetical and not intended to be a precise depiction of future zoning changes. As a result, the FEIR employed a representative analysis to assess the reasonably foreseeable impacts of new housing growth in the city. Following the publication of the FEIR and adoption of the Housing Element, the department undertook an iterative process to develop the proposed rezoning program and prepared an addendum to confirm the findings of the FEIR analysis. The addendum included additional technical analysis and determined that the representative analysis from the FEIR remained valid, and that the rezoning program would not result in new or substantially more severe significant impacts that were not already disclosed in the EIR. Furthermore, there have been no substantial changes in circumstances in the city or the revelation of new information of substantial importance such that there would be a new significant impact, or a substantial increase in severity of a previously identified significant impact, compared to what was discussed in the EIR. For projects subject to CEQA, the mitigation measures identified in the FEIR would continue to apply to future development projects, as determined applicable, during the project-specific environmental review.

As discussed in this memorandum, the commission found that the rezoning program is consistent with the general plan. The addendum and FEIR also adequately analyzed the proposed housing sustainability districts and changed circumstances with regards to the APEZ expansion and closure of the Great Highway. Lastly, the discussion in the addendum regarding SB 131 is provided primarily for informational purposes, but the department's decision to prepare an addendum does not preclude the applicability of SB 131 to the rezoning.

For these reasons, a new or subsequent FEIR is not required, and an addendum is the appropriate CEQA document for the proposed rezoning program.

San Francisco Planning

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MEMORANDUM

Date: October 16, 2025
To: San Francisco Board of Supervisors
From: Lisa Gibson, Environmental Review Officer – lisa.gibson@sfgov.org , (628) 652-7571
Debra Dwyer, Principal Planner – debra.dwyer@sfgov.org, (628) 652-7576
Ryan Shum, Senior Planner – ryan.shum@sfgov.org, (628) 652-7542

RE: CEQA Analysis for Family Zoning Plan – Substitute Legislation (Version 3)
Planning Case Nos. 2019-016230ENV, 2021-005878CWP, and 2021-005878GPA
Board file nos. 250700, 250701, and 250966

Attachments: Attachment A – Summary Table for Substitute Legislation (Version 3 –September 30, 2025)
Attachment B – Map of Family Zoning Plan Changes between July and September 2025

Introduction

The purpose of this memorandum is to document why recent minor modifications in the substitute Family Zoning Plan legislation do not require further analysis pursuant to the California Environmental Quality Act (CEQA) beyond the previously prepared environmental impact report and addendum.

Following the publication of the Housing Element 2022 Update Final Environmental Impact Report (FEIR) and adoption of the Housing Element, the San Francisco Planning Department (department) undertook an iterative process to develop a proposed rezoning program. The Mayor introduced the Family Zoning Plan (rezoning program) on June 24 and July 28, 2025. The department reviewed the legislation in compliance with CEQA, determined that there would be no new environmental impacts from the legislation, and prepared an addendum to the FEIR to confirm the findings of the FEIR analysis. The department published Addendum No. 1 to the Housing Element 2022 Update FEIR (addendum) on September 3, 2025, pursuant to CEQA.[1] The Planning Commission (commission) heard the rezoning program on September 11, 2025 and recommended its approval with modifications to the Board of Supervisors (board).

1 San Francisco Planning Department. *Addendum No. 1 to the Environmental Impact Report*. September 3, 2025. Available at: https://sfplanning.org/environmental-review-documents?title=housing+element&field_environmental_review_categ_target_id=All&items_per_page=10

After the September 11 hearing at the Planning Commission, the Mayor submitted substitute legislation on September 30, 2025 that includes minor changes to the zoning map and the planning code.[2]

This memorandum provides analysis for the modifications in the substitute legislation (Version 3 – September 30, 2025) pursuant to CEQA Statute section 21166 and CEQA Guidelines section 15162-15164, and incorporates by reference analysis in the FEIR and addendum.

Description and Analysis of Proposed Modifications

A summary list of proposed changes in the substitute legislation is included with this memorandum as Attachment A and the full text of the proposed ordinances and map changes are available online at on the board's Legislative Research Center (https://sfbos.org/legislative-research-center-lrc) under board file nos. 250700, 250701, and 250966.

The proposed changes include clarification and consistency modifications to the Planning Code, and modifications in response to Planning Commission recommendations. The proposed modifications with the potential to result in physical environmental effects are discussed further below. Table 1 below presents the environmental analysis of proposed map changes. Table 2 presents the potential environmental analysis of proposed planning code changes.

TABLE 1: CEQA Analysis of Map Changes

#	Block/Lot(s)	Amendment	CEQA Analysis
1	1701/001A, 002, 006, and 007 1804/001	Reclassify height limit and bulk district from 40-X to 40//40-R-4	Proposed modification would not alter the maximum height or density or number of units allowed compared to the rezoning program analyzed in the addendum. No further analysis required.
2	1354/001	Reclassify zoning use district from RH-2 to RM-1) instead of to RTO-C	The proposed modification would not alter the maximum height achievable and the overall units allowed would not change. The proposed modification is covered by the addendum, and no further analysis is required.
3	0035/001 0015/001 0017/002	Remove from table and maps completely	Removal of Port property from the rezoning program. No increase in height or units is proposed compared to what was previously analyzed in the addendum. No further analysis is required.
4	All parcels on Blocks 0018-0023, 0028-0034, 0040-0041, and 0043	Revise base height for North Beach/Fisherman's Wharf parcels on blocks between Columbus Avenue and the Embarcadero and between Francisco and Beach streets that have Local Program height	The maximum achievable heights would not exceed what was previously analyzed in the addendum for these parcels. No further analysis is required.

2 San Francisco Planning Department. *Family Zoning Plan: July 29, 2025, Substitute Legislation (version 3).* Available at: https://sfgov.legistar.com/View.ashx?M=F&ID=14834613&GUID=01515652-61EE-41BB-B353-CFB0C61A2C95

#	Block/Lot(s)	Amendment	CEQA Analysis
		of 85 ft. to 40 ft. (from 50 ft.) (i.e., Change from 50//85-R-4 to 40//85-R-4)	
5	All NC and parcels proposed for RTO-C on Blocks 0248-0249, 0621-0622, 0643-0645; All lots on blocks 0250-0251 and 0277-0278	Revise proposed local program height on certain parcels in the Polk Neighborhood Commercial (NC) district and proposed RTO- C parcels from 85 ft. to 120 ft.	The proposed modification would increase the maximum number of units in the area by 289 units. The substitute legislation includes a decrease of 103 units in the North Beach area, which is located near these proposed changes along and near Polk Street in the same northeastern part of the city. In aggregate, the proposed modifications would result in a net increase of approximately 186 units in the area. **Transportation.** The net increase of 186 units in the area would result in a marginal increase in housing growth closer to the 19-Polk Muni route, but the number of vehicle trips would be similar and would result in similar transportation impacts. The proposed modification would add approximately 836 daily person trips (208 automobile, 54 TNC/taxi, 234 transit, 24 bike, and 316 walking trips) to the area. Of the 180 automobile trips, only 15 vehicle trips would occur during the PM peak hour. These 15 peak hour vehicle trips would not significantly contribute to transit delay on the 19-Polk. The proposed modification would not result in a new significant transportation impact that was not previously identified in the FEIR and addendum, nor would it result in substantially more severe impacts than those previously identified. **Shadow.** The proposed modification would increase the maximum allowable building heights on the subject parcels up to 120 feet. Future development on the subject parcels may affect nearby Recreation and Park property. As described in the addendum, future development projects would be subject to future project-level CEQA review, as applicable. If subject to CEQA and the department determines that the future development would have a significant shadow impact, FEIR Mitigation Measure M-SH-1 would be required. However, given that the specific massing, location, orientation, and design of individual projects is currently unknown, and there would be uncertainties regarding the feasibility of redesigning projects to avoid or reduce significant shadow impacts to a less-than-significant level, the impact remains significant and unavoidable, consistent with the FEIR and addendum conclusions. **Wind.** The proposed modification would increase the maximum allowable building heights on the subject parcels up to 120 feet.

#	Block/Lot(s)	Amendment	CEQA Analysis
			Buildings over 85 feet in height could result in accelerated wind speeds at ground level and wind hazard impacts. The wind impact analysis in the FEIR and addendum disclosed that the nature and severity of the wind impacts under the proposed rezoning program would be similar to the wind impacts for the adopted housing element. That is, the proposed rezoning program would not result in new or substantially more severe wind impacts than identified in the FEIR. Furthermore, wind hazard exceedances could occur in some areas in the city as a result of future development under the proposed rezoning program, and FEIR Mitigation Measures M-WI-1a and M-WI-1b would apply to all buildings over 85 feet citywide, if subject to CEQA and if a significant wind impact is identified. The proposed modification is similar in nature to the proposed rezoning program changes throughout the city, and subsequent development standards would be substantially similar. For these reasons, the proposed modification would not result in new significant wind impacts that were not previously identified in the FEIR, nor would it result in more severe impacts than those previously identified. **Other Topics.** The proposed modification would increase the maximum allowable height on the subject properties up to 120 feet, but would otherwise be similar in nature to other rezoning changes proposed by the rezoning program throughout the city. The proposed modification does not consist of peculiar features or unusual circumstances that would distinguish these areas from other areas of the rezoning that have been analyzed. Thus, while the proposed modification would result in a minor increase in housing units in the area, the impacts of the following topics would be similar as to what is described in the FEIR and addendum: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, paleontological resources, population and housing, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire. No further analysis is required.
6	Blocks 0089-0091, 0100-101, 0103, 0117-0118	Remove from parcel table and maps completely all parcels on Blocks 0090, 0101, 0117, 0118 and NC parcels on Blocks 0089, 0091 and 0103. Revise	There would be no increase in height limits or anticipated units compared to what was previously analyzed in the addendum. No further analysis is required.

#	Block/Lot(s)	Amendment	CEQA Analysis
		Local Program Height from 50 ft. to 40 ft. on non-NC parcels on Blocks 0089, 0091, and 0100.	

Table 2: CEQA Analysis of Planning Code Changes

#	Planning Code Sec.	Amendment	CEQA Analysis
1	135	Reduce the usable open space requirement for Senior Housing (e.g. to 36 sq ft) and allow indoor community spaces to meet the requirement.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
2	Table 155.2	Eliminate or reduce (e.g., cut by 50%) the bike parking requirements for Senior Housing.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
3	202.2(f)(1)(C)	Change the definition of Senior Housing so that there is no minimum number of units to qualify.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
4	202.17	Expand the waiver of the Conditional Use Authorization (for use authorization) and impact fees waivers from only Legacy Businesses to all displaced businesses.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
5	206.10(d)(1)	Waive ground floor height requirement (Section 145.1) for projects using the Local Program to allow a building of 9 stories in 85-ft. height districts.	The proposed modification of the ground floor ceiling height requirement would not alter the maximum allowable overall building height of 85 feet. Therefore, no further analysis is required.
6	206.10(d)(1)(B)	Amend the unit mix requirement applicable to projects using the Local Program as follows: • 4-unit building: minimum one 2+BR	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect

#	Planning Code Sec.	Amendment	CEQA Analysis
		• 5-9 units: minimum 25% 2+BR, including at least one 3+BR unit • 10+ units: minimum 25% 2+BR, including at least 5% 3+BR	effects of the rezoning program analyzed in the addendum. No further analysis required.
7	206.10(e)(4)	Provide a square footage bonus for additional multi- bedroom units in the Local Program. Projects of 3+ units can receive additional square footage added to their building envelope for providing: • 3BR units: 250 sq. ft. for each unit provided, including any required unit(s) • 4+BR units: 400 sq. ft. for each unit provided, including any required unit(s)	The proposed modification may result in an incremental increase in height of up to one to three[3] additional story(ies) and a marginal increase in the number of units allowed on a project site. The incremental increase in height would not result in new or more significant shadow or wind impacts and would be subject to project-level environmental review, if applicable. FEIR shadow and wind mitigation measures to reduce shadow and wind impacts, respectively, would apply, as applicable; the planning department would determine whether shadow or wind mitigation measures are required during project-level environmental review. The marginal increase in the number of units on-site would not result in new or substantially more severe impacts that were not previously identified in the FEIR and addendum.
8	206.1(d)(1)(E) and (K); 414A; various	Provide a square footage bonus for family-friendly amenities in the Local Program. In R-districts, projects can get a square footage bonus for providing certain communal amenities, calculated as follows: • 2.0 sq ft bonus for each square foot provided of shared community rooms, shared kitchen, reservable room for overnight guests, extra storage for large objects, space for in-home childcare. Bonus square footage can be added horizontally	The proposed modification may result in an incremental increase in height of up to one to three additional story(ies)[4] and a marginal increase in the number of units allowed on a project site. The incremental increase in height would not result in new or more significant shadow or wind impacts and would be subject to project-level environmental review, as applicable. FEIR shadow and wind mitigation measures to reduce shadow and wind impacts, respectively, would apply, as applicable; the planning department would determine

3 The various square footage bonuses cannot cumulatively add more than one story onto a building, except on projects involving historic preservation on the parcel (see proposed code change #12 "Square Footage Bonus and Code Flexibility for Preservation of Historic Structures". Projects that utilize the square footage bonus and code flexibility for preservation of historic structures may be allowed up to two additional stories for the preservation bonus, plus one additional story cumulatively for the non-preservation incentives. In total, a project may be allowed to add up to three stories if they achieve the maximum allowable square footage bonus for both the preservation and non-preservation incentives. However, note that the square footage bonuses would not automatically grant additional height as horizontal bonuses would be considered and the total amount of square footage bonus would need to add up to one additional story. Furthermore, parcels in residential districts would not be allowed to use the additional square footage bonus as height at all and would be required to use the bonus space in other horizontal ways (e.g., reduced rear yard, etc.).

4 See footnote 3.

#	Planning Code Sec.	Amendment	CEQA Analysis
		through any combination of the following: • Reducing the required rear yard (from 30% down to 25% rear yard or 20 ft, whichever is greater). • Reducing the rear yard on the ground floor to 18% or 15 ft, whichever is greater. • Building into the required side yard, where applicable. • Reducing the required upper-story setback for additions to historic properties, from 15 ft down to 10 ft. (Preservation Design Standard P.5.1.1). In addition, projects that are providing an in-home childcare space may receive a waiver of their childcare fee obligation (Section 414A).	whether shadow or wind mitigation measures are required during project-level environmental review, if applicable. The marginal increase in the number of units on-site would not result in new or substantially more severe impacts that were not previously identified in the FEIR and addendum.
9	206.10(d)(1)(F)	Remove usable open space requirement for projects using the Local Program. Projects are still subject to applicable rear yard requirements.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
10	206.10(d)(1)(G)	Remove Planning Code exposure requirements for projects using the Local Program.	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
11	206.10(d)(1)(K)	Add an additional height bonus available for projects in the Local Program, comprised of additional square footage for providing tenant improvements (e.g., a "warm shell").	The proposed modification may result in an incremental increase in height of up to one to three additional story(ies)[5] and a marginal increase in the number of units allowed on a project site. The incremental increase in height would not result in new or more significant shadow or wind impacts and would be subject to project-level environmental review, as applicable. FEIR shadow and wind mitigation measures to reduce shadow and wind impacts, respectively, would apply as applicable; the planning department would determine

5 See footnote 3.

#	Planning Code Sec.	Amendment	CEQA Analysis
			whether shadow or wind mitigation measures are required during project-level environmental review, if applicable. The marginal increase in the number of units on-site would not result in new or substantially more severe impacts that were not previously identified in the FEIR and addendum.
12	206.10(d)(1)(K)	Square Footage Bonus and Code Flexibility for Preservation of historic structures. Add a bonus and code flexibility for adaptive reuse on sites with historic structures (which could include Category A buildings, designated Article 10/11 landmarks, and listed resources in the State or National historic registers) in districts other than R districts and in the RTO-C district that do not demolish the resource and comply with the Preservation Design Standards in ways that preserve the resource and reduce the volume of the project within the otherwise permitted building envelope not accounting for the historic structure. The bonus square footage shall be equivalent to 1.5 times the square footage foregone through setback or unused volume above the footprint of the historic structure. This volume can be used to expand the allowed volume of a building horizontally or vertically, not to exceed a certain additional number of stories (to be determined) or reduce the required rear yard above the ground floor to less than 15 feet where abutting the rear yard of parcels containing residential uses.	The proposed modification may result in an incremental increase in height of up to one to three additional story(ies)[6] and a marginal increase in the number of units allowed on a project site. **Preservation.** Future development projects that utilize this proposed bonus would be required to preserve the historic resource on-site and comply with the Preservation Design Standards so that the project would not result in a significant and unavoidable impact on the historic resource. Therefore, the proposed modification would not result in a new or substantially more severe significant impact on built-environment historic resources. **Wind & Shadow.** The incremental increase in height would not result in new or more significant shadow or wind impacts and would be subject to project-level environmental review, as applicable. FEIR shadow and wind mitigation measures to reduce shadow and wind impacts, respectively, would apply, as applicable; the planning department would determine whether shadow or wind mitigation measures are required during project-level environmental review. **Other Topics.** The potential additional units on-site would be similar in nature to other housing units in the rezoning and on the project site, and would represent a marginal increase over the number of units allowed without the square footage bonus. Thus, the marginal increase in units would not result

6 See footnote 3.

#	Planning Code Sec.	Amendment	CEQA Analysis
			in new or substantially more severe impacts that were not previously identified in the FEIR and addendum.
13	206.10(d)(1)	State that future revisions to the Housing Choice SF program must satisfy two conditions: 1) Any proposed new or increased government constraints in the Housing Choice SF program must be offset by decreasing constraints; and, 2) Substantive changes to the applicability and/or development standards in the Local Program must be analyzed for consistency with Housing Element statute in Government Code 65583(a)(3).	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
14	209.4	Edit the Use Size Control for the RTO-C district and delete the first clause ("P: up to 4,999 gross square feet per lot") so that it reads as follows: "P: Non-Residential use of any size that is part of a project where at least 2/3 of the floor area contains Residential uses. C: Non-residential use in new development, changes of use, or addition of more than 20% to an existing structure, in which the non-residential uses constitute more than 1/3 of the gross square footage of the proposed new, converted, or enlarged structure(s)."	The proposed modification would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.
15	311	Codify early notification for commercial tenants. Upon receipt of a development application on a commercial corridor, the Planning Department will send mailed notice to the address (to notify any commercial tenants) and notify the Office of Small Business.	The proposed modification would not result in a physical environmental effect. No further analysis required.
16	317(c)(12)	Edit the proposed language to read: (12) Residential Flats. Notwithstanding anything to the contrary in this Section 317, projects that propose the Merger, Reconfiguration or Reduction in size of Residential Flats shall not require a Conditional Use Authorization if the project would increase the number of	The proposed modification is a process change and would not alter the maximum height or density or number of units allowed compared to the assumptions in the FEIR or the indirect effects of the rezoning program analyzed in the addendum. No further analysis required.

#	Planning Code Sec.	Amendment	CEQA Analysis
		units on the property.	
17	Various	Clean up Planning Code Section 151 references and supersede those with 151.1 references. Planning code section 151.1 is the only remaining off-street parking section.	The proposed modification would not result in a physical environmental effect. The addendum includes analysis of the proposed changes to section 151.1, and the proposed modifications are consistent with what was analyzed in the addendum. No further analysis required.
18	207.9	Add provision that Planning Dept must maintain a publicly available list and information online of housing element reused/low income sites subject to subsection 207.9.	The proposed modification would not result in a physical environmental effect. No further analysis required.
19	Ordinance uncodified	Add clause to ordinance regarding the Local Coastal Program: “in cases of conflict between the existing Implementation Plan and this amendment, this amendment shall prevail.”	The proposed modification would not result in a physical environmental effect. No further analysis required.
20	206.10(d)(1)(M)	Add language to the 15% catchall that rear yard in any district is not eligible beyond what the local program already provides for.	The proposed modification would not result in a physical environmental effect. No further analysis required.
21	334(d)(3)	Revise Major Modifications "Exclusions" language to remove specific Code section references related to height, parking, wind, and minimum density to read as follows: "...to the following requirements: maximum permitted building height; maximum permitted accessory off-street parking amounts; wind standards; minimum density requirements; Floor Area Ratio limits;..."	The proposed modification would not result in a physical environmental effect. No further analysis required.
22	Ordinance uncodified	Uncodified findings that the new list of rezoning sites and low-income sites are compliant with Housing Element and state law and will be eligible.	The proposed modification would not result in a physical environmental effect. No further analysis required.
23	Ordinance uncodified	Add uncodified language regarding consistency with Coastal Act affordability goals	The proposed modification would not result in a physical environmental effect. No further analysis required.

Conclusion

The proposed modifications could result in minor increases in height, density, and housing unit growth in certain parts of the city, primarily in well-resourced areas. Limited growth could occur in areas adjacent to well-resourced areas, but the Housing Element FEIR and addendum acknowledged that the height and growth distribution depicted in the FEIR was hypothetical and not intended to be a precise depiction of future zoning changes. In addition, the FEIR indicated that future growth would likely be concentrated in, but is not limited to, the well-resourced areas of the city. The incremental growth would not result in new or substantially more severe significant impacts that were not already disclosed in the EIR. The mitigation measures that were identified in the FEIR would continue to apply to future development projects as determined applicable, and the department will determine which mitigation measures would apply during the project-specific environmental review phase. For these reasons, additional environmental review is not required for the modifications included in the substitute legislation.

Attachment A

FAMILY ZONING PLAN

Zoning Map & Code Ordinances | July 29, 2025 Substitute Legislation (version 2)

ZONING MAP AMENDMENTS: Board File 250700 - version 3 [xx/xx/xx]				
#	**Page**	**Parcel Map Block and Lot**	**Amendment**	**Policy Intent**
1	Ordinance uncodified		Add clause to ordinance re:LCP "in cases of conflict between the existing IP and this amendment, this amendment shall prevail."	California Coastal Commission request
2	Parcel Tables and maps	Blocks 1701 (001A, 002, 006, 007) and 1804 (001)	Reclassify from 40-X to 40//40-R-4	These blocks in CZ accidentally left off table and maps (Narrative in text already indicates this change)
3	Parcel Tables and maps	Block 1354 Lot 001 (300 Lake)	Change zoning use district reclassification to RM-1 (from RH-2) instead of to RTO-C	Given the unusually large size of the site, ensure that taller proposed heights are only through local program.
4	Parcel Tables and maps	Block/lots: 0035/001, 0017/002, and 0015/001	Remove from table and maps completely	As Port property, any height increases are subject to voter approval per Prop B. (Only height/bulk changes were proposed, no zoning use map amendments were proposed for these parcels)
5	Parcel Tables and maps	All parcels on Blocks 0018-0023, 0028-0034, 0040-0041, and 0043	Revise base height for parcels on blocks between Francisco and Beach that have Local Program height of 85' to 40' (from 50') (ie. Change from 50//85-R-4 to 40//85-R-4)	Given the large size of these parcels, reducing possibility of projects using base zoning with SDB to exceed the LP height of 85'.
5	Parcel Tables and maps	All NC and parcels proposed for RTO-C on Blocks 0248-0249, 0621-0622, 0643-0645; All Lots on Blocks 0250-0251 and 0277-0278	Revise proposed local program height on certain parcels in the Polk NC district and proposed RTO-C parcels to 120'	Increase capacity to account for other changes, align Local Program heights to reflect base height of 65' or higher

6	Parcel Tables and maps	Blocks 0089-0091, 0100-101, 0103, 0117-0118	Remove from table and maps completely all parcels on Blocks 0090, 0101, 0117, 0118 and NC parcels on Blocks 0089, 0091 and 0103. Revise Local Program Height from 50' to 40' on non-NC parcels on Blocks 0089, 0091, and 0100	Remove some non-HOA blocks in North Beach area and NC parcels south of Greenwich. Maintain existing 40' as Local Program height for non-NC parcels in NB area south of Greenwich.
7	Parcel Maps		Add Coastal Zone boundary to pdf maps	
8	Ordinance uncodified?		Add language re: consistency with Coastal Act affordability goals	

PLANNING, BUSINESS & TAX REGULATIONS CODE AMENDMENTS: Board File 250701 - version 3 [xx/xx/xx]

#	Page	Planning Code Sec.	Amendment	Policy Intent
1		135	Reduce the usable open space requirement for Senior Housing (e.g. to 36 sq ft) and allow indoor community spaces to meet the requirement.	PC recommendation
2		Table 155.2	Eliminate or reduce (e.g., cut by 50%) the bike parking requirements for Senior Housing.	PC recommendation
3		202.2(f)(1)(C)	Change the definition of Senior Housing so that there is no minimum number of units to qualify.	PC recommendation
4		202.17	Expand the waiver of the Conditional Use Authorization (for use authorization) and impact fees waivers from just Legacy Businesses to all displaced businesses.	PC recommendation
5		206.10(d)(1)	Waive ground floor height requirement (Section 145.1) for projects using the Local Program to allow a building of 9 stories in 85' height districts.	PC recommendation

6		206.10(d)(1)(B)	Amend the unit mix requirement applicable to projects using the Local Program as follows: · 4-unit building: min one 2+BR · 5-9 units: min 25% 2+BR, including at least one 3+BR unit · 10+ units: min 25% 2+BR, including at least 5% 3+BR	PC recommendation
7		206.10(e)(4)	Square Footage Bonus for additional multi-bedroom units in the Local Program: Projects of 3+ units can receive additional square footage added to their building envelope for providing: • 3BR units: 250 sq ft for each unit provided , including any the required unit(s) • 4+BR units: 400 sq ft for each unit provided including any required unit(s)	PC recommendation

8		206.1(d)(1)(E) and (K); 414A; various	Square Footage Bonus for family-friendly amenities in the Local Program: In R-districts, projects can get a square footage bonus for providing certain communal amenities, calculated as follows: · 2.0 sq ft bonus for each square foot provided of shared community rooms, shared kitchen, reservable room for overnight guests, extra storage for large objects, space for in-home childcare. Bonus square footage can be added horizontally through any combination of the following: · Reducing the required rear yard (from 30% down to 25% rear yard or 20 feet, whichever is greater). · Reducing the rear yard on the ground floor to 18% or 15 ft, whichever is greater. · Building into the required side yard, where applicable. · Reducing the required upper-story setback for additions to historic properties, from 15 feet down to 10 feet. (Preservation Design Standard P.5.1.1). In addition, projects that are providing an in-home childcare space may receive a waiver of their childcare fee obligation (Section 414A).	PC recommendation
9		206.10(d)(1)(F)	Remove usable open space requirement for projects using the Local Program. Projects are still subject to applicable rear yard requirements.	PC recommendation
10		206.10(d)(1)(G)	Remove Planning Code exposure requirements for projects using the Local Program.	PC recommendation
11		206.10(d)(1)(K)	Add an additional Height Bonus available for projects in the Local Program, comprised of additional square footage for providing tenant improvements (e.g., a "warm shell").	PC recommendation

12		206.10(d)(1)(K)	Square Footage Bonus and Code Flexibility for Preservation of historic structures. Add a bonus and code flexibility for adaptive reuse on sites with historic structures (which could include Category A buildings, designated Article 10/11 landmarks, and listed resources in the State or National historic registers) in districts other than R districts and in the RTO-C district that do not demolish the resource and comply with the Preservation Design Standards in ways that preserve the resource and reduce the volume of the project within the otherwise permitted building envelope not accounting for the historic structure. The bonus square footage shall be equivalent to 1.5 times the square footage foregone through setback or unused volume above the footprint of the historic structure. This volume can be used to expand the allowed volume of a building horizontally or vertically, not to exceed a certain additional number of stories (to be determined) or reduce the required rear yard above the ground floor to less than 15 feet where abutting the rear yard of parcels containing residential uses.	PC recommendation
13		206.10(d)(1)	State that future revisions to the Housing Choice SF program must satisfy two conditions: 1) Any proposed new or increased government constraints in the Housing Choice SF program must be offset by decreasing constraints; and, 2) Substantive changes to the applicability and/or development standards in the Local Program must be analyzed for consistency with Housing Element statute in Government Code 65583(a)(3).	PC recommendation

14		209.4	Edit the Use Size Control for the RTO-C district and delete the first clause ("P: up to 4,999 gross square feet per lot") so that it reads as follows: "P: Non-Residential use of any size that is part of a project where at least 2/3 of the floor area contains Residential uses. C: Non-residential use in new development, changes of use, or addition of more than 20% to an existing structure, in which the non-residential uses constitute more than 1/3 of the gross square footage of the proposed new, converted, or enlarged structure(s)."	clean-up
15		311	Codify early notification for commercial tenants. Upon receipt of a development application on a commercial corridor, the Planning Department will send mailed notice to the address (to notify any commercial tenants) and notify the Office of Small Business.	PC recommendation
16		317(c)(12)	Edit the proposed language to read: (12) Residential Flats. Notwithstanding anything to the contrary in this Section 317, projects that propose the Merger, Reconfiguration or Reduction in size of Residential Flats shall not require a Conditional Use Authorization if the project would increase the number of units on the property.	clean-up; previous draft language inadvertently allowed demo without CU
17		Various	Clean up Planning Code Section 151 references and supersede those with 151.1 references. PC 151.1 is the only remaining off-street parking section.	clean-up

18		207.9	Add Reused/Low Income sites ministerial to the purpose subsection. Add provision that Planning Dept must maintain a publicly available list and information online of HE reused/LI sites subject to this.	Meet HCD requirements/requests.
19		Ordinance uncodified	Add clause to ordinance re:LCP “in cases of conflict between the existing IP and this amendment, this amendment shall prevail.”	CCC request
20		206.10(d)(1)(M)	Add language to the 15% catchall that rear yard in any district is not eligible beyond what the LC already provides for.	clean-up
21		334(d)(3)	Revsie Major Mod "Exclusions" language to remove specific Code section references related to height, parking, wind, and min density to read as follows: "...to the following requirements: maximum permitted building height; maximum permitted accessory off-street parking amounts; wind standards; minimum density requirements; Floor Area Ratio limits;..."	clean-up
		Ordinance uncodified	Uncodified findings that the new list of rezoning sites and low-income sites are compliant with Housing Element and state law and will be eligible	Meet HCD requirements/requests.
		Ordinance uncodified	Add uncodified language re: consistency with Coastal act affordability goals	CCC request

Attachment B
Family Zoning Plan
Changes between July 29, 2025 and September 30, 2025
Added in September
Removed in September
Height or Zoning Use District Changed in September
No Change between July and September
See inset map
MARTIN LUTHER KING JR DR
LINCOLN WY
IRVING ST
JUDAH ST
KIRKHAM ST
LA PLAYA ST
GREAT HWY
48TH AVE
47TH AVE
46TH AVE
45TH AVE

BOARD of SUPERVISORS

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MEMORANDUM

Date: October 16, 2025

To: Planning Department/Planning Commission

From: John Carroll, Assistant Clerk, Land Use and Transportation Committee

Subject: Board of Supervisors Legislation Referral - File No. 250966
General Plan Amendments - Family Zoning Plan

☒ California Environmental Quality Act (CEQA) Determination
(California Public Resources Code, Sections 21000 et seq.)
☒ Ordinance / Resolution
☐ Ballot Measure

CEQA clearance under the September 2, 2025 Addendum No. 1 to Environmental Impact Report for the San Francisco Housing Element 2022 Update (Planning Department Case No.2019-016231ENV certified November 17, 2022).

10/16/2025 Joy Navarrete

☐ Amendment to the Planning Code, including the following Findings:
(Planning Code, Section 302(b): 90 days for Planning Commission review)
☐ General Plan ☐ Planning Code, Section 101.1 ☐ Planning Code, Section 302

☐ Amendment to the Administrative Code, involving Land Use/Planning
(Board Rule 3.23: 30 days for possible Planning Department review)

☐ General Plan Referral for Non-Planning Code Amendments
(Charter, Section 4.105, and Administrative Code, Section 2A.53)
(Required for legislation concerning the acquisition, vacation, sale, or change in use of City property; subdivision of land; construction, improvement, extension, widening, narrowing, removal, or relocation of public ways, transportation routes, ground, open space, buildings, or structures; plans for public housing and publicly-assisted private housing; redevelopment plans; development agreements; the annual capital expenditure plan and six-year capital improvement program; and any capital improvement project or long-term financing proposal such as general obligation or revenue bonds.)

☐ Historic Preservation Commission
☐ Landmark *(Planning Code, Section 1004.3)*
☐ Cultural Districts *(Charter, Section 4.135 & Board Rule 3.23)*
☐ Mills Act Contract *(Government Code, Section 50280)*
☐ Designation for Significant/Contributory Buildings *(Planning Code, Article 11)*

Please send the Planning Department/Commission recommendation/determination to John Carroll at john.carroll@sfgov.org.

Member, Board of Supervisors
District 1

City and County of San Francisco

CONNIE CHAN

陳詩敏

第一區市參事

November 17, 2025

Mayor Daniel Lurie
City Hall, Room 200
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Dear Mayor Lurie:

In partnership with community advocates across the city, we have been working with you in good faith to improve the proposed upzoning plan by doing more to mitigate harm to tenants and small businesses facing displacement. We understand that the proposal is one version in response to the state-mandate, but we need full and transparent accounting of the capacity the City has created over the past year to ensure we protect San Francisco and maintain local control.

After months of meeting and public discussion, and now with the steadfast support of our community stakeholders, **we remain committed to the following "non-negotiable" amendments:**

1. We will not demolish people's homes to replace them with market-rate units. Our existing housing is our most affordable housing.
2. We will not demolish the most important parts of San Francisco's iconic history and culture.
3. We will protect our coastal zone and defend against Trumpian privatization of public access.
4. We demand real family housing.

As stated in the proposed ordinance, Housing Element 2022 requires that the city has a realistic capacity for 82,000 additional units by 2032. This capacity comes from a combination of pipeline projects, inventory of the city's existing development sites, and changing the city's existing zoning. The Sites Inventory in the Housing Element identified approximately 58,500 units of

existing realistic capacity and was certified by California Housing and Community Development (HCD) in 2023. The proposed upzoning plan aims “to rezone and address the shortfall of 36,200 housing units” (File No. 250701, Page 7, Line 2).

Since the Sites Inventory was conducted over two years ago, the shortfall of 36,200 units was determined according to the conditions in 2022 and has not been updated to account for any capacity created as a result of zoning changes between then and the publication of the proposed upzoning plan.

This is a fact that Planning had foreseen in its Sites Inventory, citing that pending legislations – including Board File 210866 “Fourplex” and Board File 211092 "Automotive Uses and Housing Density” – “will raise the number of available sites in sites inventory output and lower the anticipated shortfall and potential rezoning proposal accordingly” (Housing Element - Appendix B, Page 46). Both of the legislations have since passed and been signed into law.

Additionally, in March of this year, the Board of Supervisors unanimously passed legislation sponsored by the Mayor and Supervisor Matt Dorsey, which reduced commercial and office development requirements for large projects in the Central SoMa Area Plan and the Transit Center C-3-O SUD (Board Files 240787 and 250003). **This action alone increased the city’s realistic housing capacity by as much as 8,500 units.**

For example, the following five large sites can now accommodate thousands more additional housing units according to new project applications submitted by developers after the recent policy change:

- 610 Brannan (Former Flower Mart) - Developer Kilroy Realty submitted new plans to Planning in September 2025 which include a variant with 3,532 additional housing units.
- 88 Bluxome - Developer Strata has submitted new plans in response to this new legislation with 1,500 new housing units.
- 725 Harrison - Currently entitled office project (845,000 sf) can now accommodate up to 1,000 housing units (Estimation proportionate to Flower Market project variants).
- 598 Brannan - Entitled office project (1 million sf) can now accommodate 1,175 housing units (Estimation proportionate to Flower Market project variants).
- 490 Brannan - Entitled office project (269,000 sf) can now accommodate 315 housing units (Estimation proportionate to Flower Market project variants).
- 3 large “opportunity sites” – approximately 1,000 unentitled units spread across three undisclosed “soft sites” identified by SF Planning. “One of these sites is in the Transit Center District and two are in Central SoMa” (SF Planning Department report on its change to the Central SoMa Plan, Page 6).

It is evident that the Board of Supervisors has been proactively working towards compliance of the Housing Element, but San Francisco has yet to receive credit for capacity created before the proposed upzoning plan. The upzoning plan's goal of creating 36,200 should be amended to reflect the increased capacity.

Again, we remain committed to meeting the State's housing mandate. We also believe that San Francisco has the capacity to meet this goal and develop family housing without displacement and erasure of San Francisco's most critical assets.

We sincerely urge you to stand with San Francisco, defend local control, and accept the collective amendments into your proposed upzoning plan.

Sincerely,

Connie Chan
Board of Supervisors

CC:
Supervisor Rafael Mandelman, President of the Board of Supervisors
Supervisor Myrna Melgar, Chair of the Land Use & Transportation Committee
Supervisor Chyanne Chen, Vice Chair of the Land Use & Transportation Committee
Supervisor Bilal Mahmood, Land Use & Transportation Committee
Director Sarah Dennis Phillips, San Francisco Planning Department
San Francisco Planning Commission

Member, Board of Supervisors
District 1

City and County of San Francisco

CONNIE CHAN
陳詩敏
第一區市參事

October 20, 2025

Chair Myrna Melgar
Vice Chair Chyanne Chen
Supervisor Bilal Mahmood
San Francisco Board of Supervisors Land Use and Transportation Committee
1 Dr. Carlton B. Goodlett Place, Suite 244
San Francisco, CA 94102

Dear Chair Melgar, Vice Chair Chen, and Supervisor Mahmood:

I first want to thank Chair Melgar for your efforts in organizing the agenda for today's hearing and allowing us the opportunity for a robust policy discussion on the Mayor's proposed upzoning plan and our proposed amendments.

It is our full intention to meet the State's housing mandate and I believe that San Francisco can both meet this goal and develop without displacement.

Since this summer, I have not only been studying the Mayor's proposed upzoning plan, my team and I have also been in conversations with many stakeholders and community members in the Richmond and citywide. We have heard from many San Franciscans who are questioning whether they will be part of our City's future or whether they will be left in the past because of this proposed upzoning plan.

Together with stakeholders, we have gone to great lengths to study the Housing Element's Site Inventory and Rezoning Program previously submitted by the City and approved by California Department of Housing and Community Development (California HCD). We used the approved guidelines to evaluate the Mayor's proposed upzoning plan and have found that the Mayor's proposed plan is a significant departure from what was already approved, with a great increase of upzoning and density to sites that have existing dwelling units. This ignores the overarching principle already agreed upon by both our local and state governments, that "change that the city needs must not harm

people", as clearly stated on page 36 in the Site Inventory and Rezoning Program document.

As a result, the amendments we propose before the Land Use Committee today, will remarkably improve this Plan and add a balanced approach to encourage housing production and meet the state housing mandate, without incentivizing displacement.

Based on the model used for the Existing Sites Inventory in the Site Inventory and Rezoning Program, again a document approved by California HCD, there is a list of characteristics used to determine non-vacant sites to be excluded for rezoning unit potential. With this model determining site inventory and excluding specific non-vacant sites, the City can still meet the mandate of San Francisco's Regional Housing Needs Allocation and Affirmatively Furthering Fair Housing laws to accommodate about 36,282 new units in Well-Resourced Neighborhoods.

In fact, as indicated in the very same document on page 42, "Sites with existing residential uses of any amount that have not otherwise been wholly excluded from the Rezoning capacity assessment were deemed to have very low reasonable likelihood of redevelopment and, as a result, had their net capacities reduced downward (generally by 98%, leaving only 2% of their theoretical capacity represented in the Rezoning capacity)."

With that in mind, we are proposing language ranging from:

- Furthering demolition controls to protect tenants;
- Implementing nexus studies and impact fees to ensure adequate infrastructure investment, especially given the fact the City is facing existing funding challenges to build out the emergency water firefighting system for well-resourced neighborhoods, a deficit in public transit, and increased risk of tenant and small business displacement;
- Placing a "shot clock" to require developers to build within 30 months to boost housing production in the near future to meet the state mandated timeline of 2031;
- Limiting Form-Based Density to the Local Density Bonus Program to provide meaningful incentives to build family housing with 2-3 bedroom requirements; and
- Strengthening historic preservation to protect the unique characters of our neighborhoods and history of San Francisco;

In the end, when the proposed amendments are overlaid with each other, they meet one policy goal: that the displacement of tenants and small businesses should not be the

cost of doing business. Instead, we can meet our housing mandate and provide incentives for developers to drive housing developments at vacant sites.

We have been in discussion with Mayor Lurie and his team almost weekly since the end of summer. Our conversation has been productive and I want to especially thank the Mayor's Deputy Chief of Staff Aly Bonde for her efforts. We have been sharing with her our amendments and continuing our conversations.

As we all know, to build housing we need both land and money. And the housing San Francisco needs most is housing people can afford. In fact, it is my intention to request the drafting and introduction of an Affordable Housing Special Use District at a later date to identify all public land, including SF Municipal Transportation Authority owned land, private land of 8,000 square feet or larger and merger lots, as well as vacant and blighted lots, and rezone them specifically for housing with a different set of local density bonus. We also must identify funding to build, and to this end I will continue to push forward conversations for a Regional Housing Bond in 2028.

I appreciate all the months of dialogue and the incredible amount of work that has gone into this upzoning plan and I know that it is our intent as a City to meet our housing needs without harming San Franciscans. I believe the amendments I have before you today will do just that. We can develop without displacement.

So again thank you, Chair Melgar and the entire Land Use Committee, for doing your due diligence of evaluating the Plan accordingly and reviewing our proposed amendments. I look forward to having your support.

Sincerely,

Connie Chan
Supervisor, District 1

City Hall • 1 Dr.Carlton B. Goodlett Place • Room 244 • San Francisco, California 94102-4689
Office (415) 554-7410 • TDD/TTY (415) 554-5227 • E-mail: Connie.Chan@sfgov.org

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689
Tel. No. (415) 554-5184
Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

NOTICE OF PUBLIC HEARING

LAND USE AND TRANSPORTATION COMMITTEE

BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO

NOTICE IS HEREBY GIVEN THAT the Board of Supervisors of the City and County of San Francisco's Land Use and Transportation Committee will hold a public hearing to consider the following proposals and said public hearing will be held as follows, at which time all interested parties may attend and be heard:

Date: **Monday, October 20, 2025**

Time: **1:30 p.m.**

Location: **Legislative Chamber, Room 250, located at City Hall**
1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102

Subject: **File No. 250700.** Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.

Subject: **File No. 250701.** Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Subject: **File No. 250966.** Ordinance amending the General Plan to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; amending the City's Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 340.

In accordance with Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on these matters may submit written comments. These comments will be added to the official public record in these matters and shall be brought to the attention of the Board of Supervisors. Written comments should be addressed to Angela Calvillo, Clerk of the Board, City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA, 94102 or sent via email (bos@sfgov.org). Information relating to these matters are available with the Office of the Clerk of the Board or the Board of Supervisors' Legislative Research Center (https://sfbos.org/legislative-research-center-lrc). Agenda information relating to these matters will be available for public review on Friday, October 17, 2025.

For any questions about this hearing, please contact the Assistant Clerk for the Land Use and Transportation Committee:

John Carroll (john.carroll@sfgov.org ~ (415) 554-4445)

Angela Calvillo
Clerk of the Board of Supervisors
City and County of San Francisco

jec:bjj:ams

DATED ~ POSTED~ MAILED ~ PRINTED: October 3, 2025

San Francisco Examiner

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GOVERNMENT

NOTICE OF PUBLIC HEARING BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO LAND USE AND TRANSPORTATION COMMITTEE MONDAY OCTOBER 20, 2025 - 1:30 PM Legislative Chamber, Room 250, City Hall 1 Dr. Carlton B. Goodlett Place, San Francisco. CA 94102

NOTICE IS HEREBY GIVEN THAT the Board of Supervisors of the City and County of San Francisco's Land Use and Transportation Committee will hold a public hearing to consider the following proposals and said public hearing will be held as follows, at which time all interested parties may attend and be heard:

File No. 250700. Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.

File No. 250701. Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 340.

In accordance with Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on these matters may submit written comments. These comments will be added to the official public record in these matters and shall be brought to the attention of the Board of Supervisors. Written comments should be addressed to Angela Calvillo, Clerk of the Board, City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA, 94102 or sent via email (bos@sfgov.org). Information relating to these matters are available with the Office of the Clerk of the Board or the Board of Supervisors' Legislative Research Center (https://sfbos.org/legislative-research-center-lrc). Agenda information relating to these matters will be available for public review on Friday, October 17, 2025.

For any questions about this hearing, please contact the Assistant Clerk for the Land Use and Transportation Committee: John Carroll (john.carroll@sfgov.org ~ (415) 554-4445)

EXM-3973931#

NOTICE OF REGULAR MEETING SAN FRANCISCO BOARD OF SUPERVISORS LAND USE AND TRANSPORTATION COMMITTEE CITY HALL, LEGISLATIVE CHAMBER, ROOM 250 1 DR. CARLTON B. GOODLETT PLACE, SAN FRANCISCO, CA 94102 MONDAY, OCTOBER 6, 2025 - 1:30 PM

The agenda packet and legislative files are available for review at https://sfbos.org/legislative-research-center-lrc, in Room 244 at City Hall, or by calling (415) 554-5184.

EXM-3973907#

NOTICE OF REGULAR MEETING SAN FRANCISCO BOARD OF SUPERVISORS RULES COMMITTEE CITY HALL, LEGISLATIVE CHAMBER, ROOM 250 1 DR. CARLTON B. GOODLETT PLACE, SAN FRANCISCO, CA 94102 October 6, 2025 – 10:00 AM

The agenda packet and legislative files are available for review at https://sfbos.org/legislative-research-center-lrc, in Room 244 at City Hall, or by calling (415) 554-5184.

EXM-3973812#

NOTICE OF SPECIAL MEETING SAN FRANCISCO BOARD OF SUPERVISORS GOVERNMENT AUDIT AND OVERSIGHT COMMITTEE CITY HALL, COMMITTEE ROOM 263 1 DR. CARLTON B. GOODLETT PLACE SAN FRANCISCO, CA 94102 October 6, 2025 - 12:00 PM

The agenda packet and legislative files are available for review at https://sfbos.org/legislative-research-center-lrc, in Room 244 at City Hall, or by calling (415) 554-5184.

EXM-3971474#

CIVIL

ORDER TO SHOW CAUSE FOR CHANGE OF NAME
Case No. 25CIV06662
Superior Court of California, County of SAN MATEO
Petition of: AI ZHEN XIAN AKA JANE AIZHEN XIAN AKA AIZHEN XIAN for Change of Name
TO ALL INTERESTED PERSONS:
Petitioner AI ZHEN XIAN AKA JANE AIZHEN XIAN AKA AIZHEN XIAN filed a petition with this court for a decree changing names as follows:
AI ZHEN XIAN AKA JANE AIZHEN XIAN AKA AIZHEN XIAN to JANE AIZHEN XIAN
The Court orders that all persons interested in this matter appear before this court at the hearing indicated below to show cause, if any, why the petition for change of name should not be granted. Any person objecting to the name changes described above must file a written objection that includes the reasons for the objection at least two court days before the matter is scheduled to be heard and must appear at the hearing to show cause why the petition should not be granted. If no written objection is timely filed, the court may grant the petition without a hearing.
Notice of Hearing:
Date: 11/18/2025, Time: 9:00 A.M., Dept.: MC, Room: N/A
The address of the court is 400 COUNTY CENTER, REDWOOD CITY, CA 94063
(To appear remotely, check in advance of the hearing for information about how to do so on the court's website. To find your court's website, go to www.courts.ca.gov/find-my-court.htm.)
A copy of this Order to Show Cause must be published at least once each week for four successive weeks before the date set for hearing on the petition in a newspaper of general circulation, printed in this county: EXAMINER REDWOOD CITY TRIBUNE
Date: 9/15/2025

Judge of the Superior Court
9/26, 10/3, 10/10, 10/17/25
SPEN-3971404#
EXAMINER - REDWOOD CITY TRIBUNE

ORDER TO SHOW CAUSE FOR CHANGE OF NAME
Case No. CNC-25-56120
Superior Court of California, County of San Francisco
Petition of: Azar Saeidi for Change of Name
TO ALL INTERESTED PERSONS:
Petitioner Azar Saeidi filed a petition with this court for a decree changing names as follows:
Azar Saeidi to Azar Sona Saeidi
The Court orders that all persons interested in this matter appear before this court at the hearing indicated below to show cause, if any, why the petition for change of name should not be granted. Any person objecting to the name changes described above must file a written objection that includes the reasons for the objection at least two court days before the matter is scheduled to be heard and must appear at the hearing to show cause why the petition should not be granted. If no written objection is timely filed, the court may grant the petition without a hearing.
Notice of Hearing:
Date: 11/04/2025, Time: 9 am, Dept.: 103, Room: 103
The address of the court is 400 McAllister Street San Francisco, CA-94102
A copy of this Order to Show Cause shall be published at least once each week for four successive weeks prior to the date set for hearing on the petition in the following newspaper of general circulation, printed in this county: - SAN FRANCISCO EXAMINER
Date: 09/18/2025
Michelle Tong
Judge of the Superior Court
9/26, 10/3, 10/10, 10/17/25
CNS-3971228#

ORDER TO SHOW CAUSE FOR CHANGE OF NAME
Case No. CNC-25-560132
Superior Court of California, County of SAN FRANCISCO
Petition of: JORDAN SUGAR-CARLSGAARD ON BEHALF OF MONROE MARGOT SUGAR-PICKLES, A MINOR for Change of Name
TO ALL INTERESTED PERSONS:
Petitioner JORDAN SUGAR-CARLSGAARD filed a petition with this court for a decree changing names as follows:
MONROE MARGOT SUGAR-PICKLES to MONROE MARGOT SUGAR
The Court orders that all persons interested in this matter appear before this court at the hearing indicated below to show cause, if any, why the petition for change of name should not be granted. Any person objecting to the name changes described above must file a written objection that includes the reasons for the objection at least two court days before the matter is scheduled to be heard and must appear at the hearing to show cause why the petition should not be granted. If no written objection is timely filed, the court may grant the petition without a hearing.
Notice of Hearing:
Date: NOVEMBER 6, 2025, Time: 9:00 A.M., Dept.: 103, Room: 103
The address of the court is 400 MCALLISTER STREET, SAN FRANCISCO, CA 94102
(To appear remotely, check in advance of the hearing for information about how to do so on the court's website. To find your court's website, go to www.courts.ca.gov/find-my-court.htm.)
A copy of this Order to Show Cause must be published at least once each week for four successive weeks before the date set for hearing on the petition in a newspaper of general circulation, printed in this county: SAN FRANCISCO EXAMINER
Date: SEPTEMBER 23, 2025
MICHELLE TONG
Judge of the Superior Court
10/3, 10/10, 10/17, 10/24/25
CNS-3971201#
SAN FRANCISCO EXAMINER

ORDER TO SHOW CAUSE FOR CHANGE OF NAME
Case No. CNC-25-560088
Superior Court of California, County of SAN FRANCISCO
Petition of: MIA ROSE HAYNES for Change of Name
TO ALL INTERESTED PERSONS:
Petitioner MIA ROSE HAYNES filed a petition with this court for a decree changing names as follows:
MIA ROSE HAYNES to MIA ROSE OUSSET
The Court orders that all persons interested in this matter appear before this court at the hearing indicated below to show cause, if any, why the petition for change of name should not be granted. Any person objecting to the name changes described above must file a written objection that includes the reasons for the objection at least two court days before the matter is scheduled to be heard and must appear at the hearing to show cause why the petition should not be granted. If no written objection is timely filed, the court may grant the petition without a hearing.
Notice of Hearing:
Date: OCTOBER 21, 2025, Time: 9:00 A.M., Dept.: 103N, Room: 103N
The address of the court is 400 MCALLISTER STREET, SAN FRANCISCO, CA 94102
(To appear remotely, check in advance of the hearing for information about how to do so on the court's website. To find your court's website, go to www.courts.ca.gov/find-my-court.htm.)
A copy of this Order to Show Cause must be published at least once each week for four successive weeks before the date set for hearing on the petition in a newspaper of general circulation, printed in this county: SAN FRANCISCO EXAMINER
Date: SEPTEMBER 5, 2025
MICHELLE TONG
Judge of the Superior Court
9/12, 9/19, 9/26, 10/3/25
CNS-3966299#
SAN FRANCISCO EXAMINER

FICTITIOUS BUSINESS NAMES

FICTITIOUS BUSINESS NAME STATEMENT
File No. 2025-0407217
Fictitious Business Name(s)/Trade Name (DBA):
OMEN & AETHER, 1640 KIRKHAM ST APT 8, SAN FRANCISCO, CA 94122
County of SAN FRANCISCO
Registered Owner(s):
MARIA KEEHN, 1640 KIRKHAM ST APT 8, SAN FRANCISCO, CA 94122
This business is conducted by: AN INDIVIDUAL
The registrant commenced to transact business under the fictitious business name or names listed above on 9/02/2025.
I declare that all information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions code that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars ($1,000).)
S/ MARIA KEEHN
This statement was filed with the County Clerk of San Francisco County on 09/02/2025.
NOTICE-In accordance with Subdivision (a) of Section 17920, a Fictitious Name Statement generally expires at the end of five years from the date on which it was filed in the office of the County Clerk, except, as provided in Subdivision (b) of Section 17920, where it expires 40 days after any change in the facts set forth in the statement pursuant to Section 17913 other than a change in the residence address of a registered owner. A new Fictitious Business Name Statement must be filed before the expiration. The filing of this statement does not of itself authorize the use in this state of a Fictitious Business Name in violation of the rights of another under federal, state, or common law (See Section 14411 et seq., Business and Professions Code).
10/3, 10/10, 10/17, 10/24/25
CNS-3972840#
SAN FRANCISCO EXAMINER

FICTITIOUS BUSINESS NAME STATEMENT
File No. 2025-0407319
Fictitious Business Name(s)/Trade Name (DBA):
AFFIRM, 650 CALIFORNIA ST. 12TH FLOOR, SAN FRANCISCO, CA 94108
County of SAN FRANCISCO
Registered Owner(s):
AFFIRM, INC, (DE) 650 CALIFORNIA ST., 12TH FLOOR, SAN FRANCISCO, CA 94108
This business is conducted by: A CORPORATION
The registrant commenced to transact business under the fictitious business name or names listed above on 2/5/2013.
I declare that all information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions code that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars ($1,000).)
S/ KATHERINE ADKINS, SECRETARY
This statement was filed with the County Clerk of San Francisco County on 09/12/2025.
NOTICE-In accordance with Subdivision (a) of Section 17920, a Fictitious Name Statement generally expires at the end of five years from the date on which it was filed in the office of the County Clerk, except, as provided in Subdivision (b) of Section 17920, where it expires 40 days after any change in the facts set forth in the statement pursuant to Section 17913 other than a change in the residence address of a registered owner. A new Fictitious Business Name Statement must be filed before the expiration. The filing of this statement does not of itself authorize the use in this state of a Fictitious Business Name in violation of the rights of another under federal, state, or common law (See Section 14411 et seq., Business and Professions Code).
10/3, 10/10, 10/17, 10/24/25
CNS-3972838#
SAN FRANCISCO EXAMINER

FICTITIOUS BUSINESS NAME STATEMENT
File No. M-301718
The following person(s) is (are) doing business as:
Garcia Home and Office Solutions, 1532 Day Ave, San Mateo, CA 94403 County of California
Sonia Maribel Garcia, 1532 Day Ave, San Mateo, CA 94403
This business is conducted by an Individual
The registrant(s) commenced to transact business under the fictitious business name or names listed above on 12/17/24.
I declare that all information in this statement is true and correct. (A registrant who declares as true information which he or she knows to be false is guilty of a crime.)
S/ Sonia Garcia,
This statement was filed with the County Clerk of San Mateo County on 09/23/2025.
Mark Church, County Clerk
[Deputy], Deputy
Original
10/3, 10/10, 10/17, 10/24/25
NPEN-3972731#
EXAMINER - BOUTIQUE & VILLAGER

FICTITIOUS BUSINESS NAME STATEMENT
File No. 2025-0407333
Fictitious Business Name(s)/Trade Name (DBA):
FANCY MONKEYS PUBLISHING, 385 10TH STREET, APT 3, SAN FRANCISCO, CA 94103
County of SAN FRANCISCO
Registered Owner(s):
ARIEL ONGOCO, 385 10TH STREET APT 3, SAN FRANCISCO, CA 94103
This business is conducted by: AN INDIVIDUAL
The registrant commenced to transact business under the fictitious business name or names listed above on 9/92025.
I declare that all information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions code that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars ($1,000).)
S/ ARIEL ONGOCO
This statement was filed with the County Clerk of San Francisco County on 09/16/2025.
NOTICE-In accordance with Subdivision (a) of Section 17920, a Fictitious Name Statement generally expires at the end of five years from the date on which it was filed in the office of the County Clerk, except, as provided in Subdivision (b) of Section 17920, where it expires 40 days after any change in the facts set forth in the statement pursuant to Section 17913 other than a change in the residence address of a registered owner. A new Fictitious Business Name Statement must be filed before the expiration. The filing of this statement does not of itself authorize the use in this state of a Fictitious Business Name in violation of the rights of another under federal, state, or common law (See Section 14411 et seq., Business and Professions Code).
10/3, 10/10, 10/17, 10/24/25
CNS-3971878#
SAN FRANCISCO EXAMINER

FICTITIOUS BUSINESS NAME STATEMENT
File No. 2025-0407351
Fictitious Business Name(s)/Trade Name (DBA):
SHINE FACILITY SERVICES, 970 FOLSOM ST, SAN FRANCISCO, CA 94107
County of SAN FRANCISCO
Registered Owner(s):
GREEN LIVING PLANET LLC, (CA), 970 FOLSOM ST,

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SAN FRANCISCO, CA 94102

EXM# 3973931

COPY OF NOTICE

Notice Type: GPN GOVT PUBLIC NOTICE

Ad Description
JEC - LUT HEARING - OCTOBER 20, 2025 - FILE NOS. 250700, 250701, and 250966

To the right is a copy of the notice you sent to us for publication in the SAN FRANCISCO EXAMINER. Thank you for using our newspaper. Please read this notice carefully and call us with ny corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

10/03/2025

The charge(s) for this order is as follows. An invoice will be sent after the last date of publication. If you prepaid this order in full, you will not receive an invoice.

Publication	$1719.90
Set aside for CCSF Outreach Fund	$191.10
Total	$1911.00

NOTICE OF PUBLIC HEARING BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO LAND USE AND TRANSPORTATION COMMITTEE MONDAY OCTOBER 20, 2025 - 1:30 PM Legislative Chamber, Room 250, City Hall 1 Dr. Carlton B. Goodlett Place, San Francisco. CA 94102

NOTICE IS HEREBY GIVEN THAT the Board of Supervisors of the City and County of San Francisco's Land Use and Transportation Committee will hold a public hearing to consider the following proposals and said public hearing will be held as follows, at which time all interested parties may attend and be heard:

File No. 250700. Ordinance amending the Zoning Map to implement the Family Zoning Plan by: amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Sites Special Use District (SFMTA SUD); amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of public necessity, convenience, and welfare under Planning Code, Section 302; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making findings under the City's Local Coastal Program and the California Coastal Act of 1976.

File No. 250701. Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit businesses displaced by new construction to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts, and 12) reduce usable open space and bicycle parking requirements for senior housing; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; also, amending the Local Coastal

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Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

File No. 250966. Ordinance amending the General Plan to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; amending the City's Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 340.

In accordance with Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on these matters may submit written comments. These comments will be added to the official public record in these matters and shall be brought to the attention of the Board of Supervisors. Written comments should be addressed to Angela Calvillo, Clerk of the Board, City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA, 94102 or sent via email (bos@sfgov.org). Information relating to these matters are available with the Office of the Clerk of the Board or the Board of Supervisors' Legislative Research Center (https://sfbos.org/legislative-research-center-lrc). Agenda information relating to these matters will be available for public review on Friday, October 17, 2025.

For any questions about this hearing, please contact the Assistant Clerk for the Land Use and Transportation Committee: John Carroll (john.carroll@sfgov.org ~ (415) 554-4445)

EXM-3973931#

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

NOTICE OF AVAILABILITY

LOCAL COASTAL PROGRAM AMENDMENT

(GENERAL PLAN AMENDMENT, PLANNING CODE TEXT AMENDMENT, ZONING MAP AMENDMENT)

NOTICE IS HEREBY GIVEN THAT in accordance with the applicable provisions of the California Coastal Act and implementing regulations, drafts of the proposed amendments to the San Francisco General Plan, Zoning Map, Planning Code, and **Local Coastal Program** are available for public review and inspection for a six-week public review period beginning August 1, 2025.

Documents are available at the following locations and online:

San Francisco Planning Code, Zoning Map, and Local Coastal Program Implementation Plan Amendments:

- San Francisco Planning Department 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
- Office of the Clerk of the Board of Supervisors, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102
- https://sfbos.org/legislative-research-center-lrc (File Nos. 250700, 250701)
- City and County of San Francisco - File #: 250700
- City and County of San Francisco - File #: 250701

San Francisco General Plan and Local Coastal Program Land Use Plan Amendments:

- San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
- https://citypln-m-extnl.sfgov.org/Commissions/CPC/7_17_2025/Commission Packet/2021-005878GPA.pdf

Ordinance and Local Coastal Program Amendment Description: Three Ordinances are proposed for adoption by the City. Because the Ordinances apply in part to property located in the Coastal Zone, enactment requires amending the Land Use Plan and Implementation Plan of the City's Local Coastal Program.

1) Board File No. 250700 - Ordinance amending the Zoning Map to implement the Family Zoning Plan by amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Special Use District (SFMTA SUD); **amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment;**

2) Board File No. 250701 - Ordinance amending the Planning Code to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in

certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal Transportation Agency Sites Special Use District, 9) permit certain Legacy Businesses to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, and 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; **amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment;**

3) Planning Commission Case Number 2021-005878GPA - Ordinance amending the General Plan to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; **amending the City's Local Coastal Program to implement the Housing Choice- San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the ordinance to the Coastal Commission upon enactment;**

The Planning Commission will consider these Amendments on or after September 11, 2025. The Planning Commission recommendation on these Amendments will be advisory to the Board of Supervisors, which has final approval authority over the San Francisco General Plan, Planning Code, Zoning Map, and Local Coastal Program Amendments.

The final decision by the Board of Supervisors will occur no sooner than six weeks after the date of this notice; after which the City shall submit the Local Coastal Program Amendments to the California Coastal Commission for certification. The Ordinances and Local Coastal Program Amendments are not operative within the Coastal Zone until final certification by the California Coastal Commission. If the California Coastal Commission certifies these Local Coastal Program Amendments, subject to modifications, the Local Coastal Program Amendments shall become effective 30 days after enactment of the modifications.

All interested persons are invited to comment on the draft amendment either in person at the scheduled public hearing, or in writing to the San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103 before September 11, 2025. If you wish to challenge the City's action on the above proceedings in court, you may be limited to addressing only those issues you or someone else have raised at the public hearing described in this notice or written in correspondence to the City at or before the public hearing.

For any questions about this Notice of Availability, please contact Amnon Ben-Pazi, Planning Department staff, at Amnon.Ben-Pazi@sfgov.org or call (628) 652-7428.

From: Ben-Pazi, Amnon (CPC)
To: Carroll, John (BOS)
Cc: GUALCO, GIULIA (CAT)
Subject: FW: Notice of Availability of Local Coastal Program Amendment
Date: Monday, August 4, 2025 1:47:49 PM

John, FYI this is the email that went out 8/1.

Amnon Ben-Pazi, Senior Planner
Citywide Division
San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7428 | www.sfplanning.org
San Francisco Property Information Map

From: San Francisco Planning Department <CPC.PlanningNews@sfgov.org>
Sent: Friday, August 01, 2025 12:00 PM
To: Ben-Pazi, Amnon (CPC) <amnon.ben-pazi@sfgov.org>
Subject: Notice of Availability of Local Coastal Program Amendment

San Francisco Planning logo

NOTICE OF AVAILABILITY: LOCAL COASTAL PROGRAM AMENDMENT (GENERAL PLAN AMENDMENT, PLANNING CODE TEXT AMENDMENT, ZONING MAP AMENDMENT)

NOTICE IS HEREBY GIVEN THAT in accordance with the applicable provisions of the California Coastal Act and implementing regulations, drafts of the proposed amendments to the San Francisco General Plan, Zoning Map, Planning Code, and **Local Coastal Program** are available for public review and inspection for a six-week public review period beginning August 1, 2025.

Documents are available at the following locations and online:

- **San Francisco Planning Code, Zoning Map, and Local Coastal Program Implementation Plan Amendments:**
  - San Francisco Planning Department 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
  - Office of the Clerk of the Board of Supervisors, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102
  - Board Of Supervisors File #250700

    - Board Of Supervisors File #250701

- **San Francisco General Plan and Local Coastal Program Land Use Plan Amendments:**
    - San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
    - Planning Commission Case Number 2021-005878GPA

Ordinance and Local Coastal Program Amendment Description: Three Ordinances are proposed for adoption by the City. Because the Ordinances apply in part to property located in the Coastal Zone, enactment requires amending the Land Use Plan and Implementation Plan of the City's Local Coastal Program.

1. **Board File No. 250700 - Ordinance amending the Zoning Map** to implement the Family Zoning Plan by amending the Zoning Use District Maps to: 1) reclassify certain properties currently zoned as various types of Residential to Residential Transit Oriented - Commercial (RTO-C); 2) reclassify properties currently zoned Residential Transit Oriented (RTO) to Residential Transit Oriented - 1 (RTO-1); 3) reclassify certain properties from Residential districts other than RTO to RTO-1; 4) reclassify certain properties currently zoned Neighborhood Commercial (NC) or Public (P) to Community Business (C-2); and 5) reclassify certain properties from Public to Mixed-Use or Neighborhood Commercial Districts; amending the Height and Bulk Map to: 1) reclassify properties in the Family Zoning Plan to R-4 Height and Bulk District; 2) change the height limits on certain lots in the R-4 Height and Bulk District; and 3) designating various parcels to be included in the Non-Contiguous San Francisco Municipal Transportation Agency Special Use District (SFMTA SUD); **amending the Local Coastal Program to: 1) reclassify all properties in the Coastal Zone to R-4 Height and Bulk District; 2) reclassify certain properties to RTO-C and Neighborhood Commercial District; 3) designate one parcel as part of the SFMTA SUD; and 4) directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment;**
2. **Board File No. 250701 - Ordinance amending the Planning Code** to: 1) create the Housing Choice-San Francisco Program to incent housing development through a local bonus program and by adopting a Housing Sustainability District, 2) modify height and bulk limits to provide for additional capacity in well-resourced neighborhoods, and to allow additional height and bulk for projects using the local bonus program, 3) require only buildings taller than 85 feet in certain Districts to reduce ground level wind currents, 4) make conforming changes to the RH (Residential, House), RM (Residential, Mixed), and RC (Residential-Commercial) District zoning tables to reflect the changes to density controls, and parking requirements made in this ordinance, 5) create the RTO-C (Residential Transit Oriented-Commercial) District, 6) implement the Metropolitan Transportation Commission's Transit-Oriented Communities Policy by making changes to parking requirements, minimum residential densities, and minimum office intensities, and requiring maximum dwelling unit sizes, 7) revise off-street parking and curb cut obligations citywide, 8) create the Non-contiguous San Francisco Municipal

Transportation Agency Sites Special Use District, 9) permit certain Legacy Businesses to relocate without a conditional use authorization and waive development impact fees for those businesses, 10) make technical amendments to the Code to implement the above changes, and 11) make conforming changes to zoning tables in various Districts, including the Neighborhood Commercial District and Mixed Use Districts; amending the Business and Tax Regulations Code regarding the Board of Appeals' review of permits in the Housing Choice Program Housing Sustainability District; **amending the Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment;**

3. **Planning Commission Case Number 2021-005878GPA - Ordinance amending the General Plan** to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; **amending the City's Local Coastal Program to implement the Housing Choice- San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the ordinance to the Coastal Commission upon enactment;**

The Planning Commission will consider these Amendments on or after September 11, 2025. The Planning Commission recommendation on these Amendments will be advisory to the Board of Supervisors, which has final approval authority over the San Francisco General Plan, Planning Code, Zoning Map, and Local Coastal Program Amendments.

The final decision by the Board of Supervisors will occur no sooner than six weeks after the date of this notice; after which the City shall submit the Local Coastal Program Amendments to the California Coastal Commission for certification. The Ordinances and Local Coastal Program Amendments are not operative within the Coastal Zone until final certification by the California Coastal Commission. If the California Coastal Commission certifies these Local Coastal Program Amendments, subject to modifications, the Local Coastal Program Amendments shall become effective 30 days after enactment of the modifications.

All interested persons are invited to comment on the draft amendment either in person at the scheduled public hearing, or in writing to the San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103 before September 11, 2025. If you wish to challenge the City's action on the above proceedings in court, you may be limited to addressing only those issues you or someone else have raised at the public hearing described in this notice or written in correspondence to the City at or before the public hearing.

For any questions about this Notice of Availability, please contact Amnon Ben-Pazi,

Planning Department staff, at Amnon.Ben-Pazi@sfgov.org or call (628) 652-7428.

PLEASE DO NOT REPLY TO THIS AUTOMATED EMAIL.

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Para información en Español llamar al (628) 652-7550.
Para sa impormasyon sa Tagalog tumawag sa (628) 652-7550.

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49 South Van Ness | San Francisco, CA 94103 US

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BOARD of SUPERVISORS

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San Francisco, CA 94102-4689
Tel. No. (415) 554-5184
Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

MEMORANDUM

LAND USE AND TRANSPORTATION COMMITTEE

Date: December 1, 2025

To: Supervisor Myrna Melgar, Chair
Land Use and Transportation Committee

From: Alisa Somera, Legislative Deputy Director

Subject: COMMITTEE REPORT, BOARD MEETING
Tuesday, December 2, 2025

The following file should be presented as COMMITTEE REPORT during the Board meeting on Tuesday, December 2, 2025. This Ordinance was acted upon during the Land Use and Transportation Committee meeting on Monday, December 1, 2025, at 1:30 p.m., by the votes indicated.

BOS Item No. 36 **File No. 250966**

[General Plan Amendments - Family Zoning Plan]

Ordinance amending the General Plan to revise the Urban Design Element, Commerce and Industry Element, Transportation Element, Balboa Park Station Area Plan, Glen Park Community Plan, Market and Octavia Area Plan, Northeastern Waterfront Plan, Van Ness Avenue Area Plan, Western SoMa (South of Market) Area Plan, Western Shoreline Area Plan, Downtown Area Plan, and Land Use Index, to implement the Family Housing Zoning Program, including the Housing Choice-San Francisco Program, by adjusting guidelines regarding building heights, density, design, and other matters; amending the City's Local Coastal Program to implement the Housing Choice-San Francisco Program and other associated changes in the City's Coastal Zone, and directing the Planning Director to transmit the Ordinance to the Coastal Commission upon enactment; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 340.

RECOMMENDED AS A COMMITTEE REPORT

Vote: Supervisor Myrna Melgar – Aye
Supervisor Chyanne Chen – No
Supervisor Bilal Mahmood – Aye

c: Board of Supervisors
Angela Calvillo, Clerk of the Board
Alisa Somera, Legislative Deputy
Brad Russi, Deputy City Attorney

Member, Board of Supervisors
District 7

City and County of San Francisco

MYRNA MELGAR

DATE: November 24, 2025

TO: Angela Calvillo
Clerk of the Board of Supervisors

FROM: Supervisor Myrna Melgar, Chair, Land Use and Transportation Committee

RE: Land Use and Transportation Committee
COMMITTEE REPORTS

Pursuant to Board Rule 4.20, as Chair of the Land Use and Transportation Committee, I have deemed the following matters are of an urgent nature and request them be considered by the full Board on Tuesday, December 2, 2025.

File No. 240637	**Planning Code, Zoning Map - Central Neighborhoods Large Residence SUD, Corona Heights Large Residence SUD** Sponsor: Mandelman
File No. 250966	**General Plan Amendments - Family Zoning Plan**
File No. 250700	**Zoning Map - Family Zoning Plan** Sponsors: Mayor; Sauter, Mahmood and Dorsey
File No. 250701	**Planning, Business and Tax Regulations Codes - Family Zoning Plan** Sponsor: Mayor

These matters will be heard in the Land Use and Transportation Committee at a Regular Meeting on Monday, December 1, 2025.

City Hall · 1 Dr. Carlton B. Goodlett Place, Room 244 · San Francisco, California 94102-4689 · (415) 554-6516
TDD/TTY (415) 554-5227 · E-mail: Myrna.Melgar@sfgov.org

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	BOS-Operations; Carroll, John (BOS); BOS Legislation, (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS)
Subject:	3 Letters Regarding File Nos. 250700, 250701, 250966, and 251072
Date:	Thursday, December 4, 2025 12:06:04 PM
Attachments:	3 Letters Regarding File Nos. 250700, 250701, 250966, and 251072.pdf

Hello,

Please see attached 3 letters regarding File Nos.:

250700: Zoning Map - Family Zoning Plan
250701: Planning, Business and Tax Regulations Codes - Family Zoning Plan
250966: General Plan Amendments - Family Zoning Plan
251072: Planning, Business and Tax Regulations Codes - Family Zoning Plan

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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From:	Kathy Howard
To:	DorseyStaff (BOS); MahmoodStaff; MandelmanStaff (BOS); MelgarStaff (BOS); SauterStaff; SherrilStaff@sfgov.org; Board of Supervisors (BOS); WongStaff (BOS)
Subject:	You vote on the "Family" Zoning plan does not meet the needs of San Franciscans.
Date:	Thursday, December 4, 2025 11:00:41 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors who voted to approve the Mayor Rich Family Zoning Plan,

Please rethink your vote. There are so many problems with this plan! See my email below. Please stand up for San Franciscans!
Please vote NO next week and make these changes.

Katherine Howard
Sunset District

From: kh <kathyhoward@earthlink.net>
Date: Monday, December 1, 2025 at 9:11 PM
To: Supervisor Connie Chan <ChanStaff@sfgov.org>, <ChenStaff@sfgov.org>, <DorseyStaff@sfgov.org>, <Jackie.Fielder@sfgov.org>, <MahmoodStaff@sfgov.org>, Rafael Mandelman <MandelmanStaff@sfgov.org>, <MelgarStaff@sfgov.org>, <SauterStaff@sfgov.org>, Shamann Walton <Shamann.Walton@sfgov.org>, <SherrilStaff@sfgov.org>, A Clerk of the Board <Board.of.Supervisors@sfgov.org>, <daniel.lurie@sfgov.org>
Cc: <sean.mcgarry@sfgov.org>, <amy.campbell@sfgov.org>, Theresa Imperial <theresa.imperial@sfgov.org>, <kathrin.moore@sfgov.org>, <derek.braun@sfgov.org>, <lydia.so@sfgov.org>, <gilbert.a.williams@sfgov.org>, Jonas Ionin <jonas.ionin@sfgov.org>
Subject: BOS: Postpone vote on the 'Family' Zoning plan.

Dear Supervisors,

The entire City voted on District 4's Great Highway, but once again **District 4**, through no fault of our own, **has NO voice in the upzoning legislation**. This is despite the fact that the upzoning legislation could result in bulldozing our entire neighborhood. We have had a new Supervisor all of one day and no easy way to contact him. He has not had time to hold neighborhood meetings; he has not had the opportunity to find out what his district thinks.

You should **postpone this vote** until we have had the opportunity to meet with our new Supervisor. *We are tired of being ignored*.

As to the legislation, many changes must be made:

- **Eliminate in-lieu fees**. In-lieu fees delay affordable housing and create exclusive enclaves of luxury housing.
- **Dedicate all suitable public land – excluding parks and public open space - to 100% affordable housing.**
- **Preserve the Coastal Zone as it is today.**
- **Prohibit upzoning in the Tsunami Zone.** It is reckless to increase building heights or density in areas at high risk of tsunami inundation.
- **Repair and reactivate the local tsunami warning system**.
- **Protect historic and culturally significant buildings, districts and open space.** All **Category A and A-eligible historic buildings, districts, and open space** should be exempted from upzoning. District 4's mid-century homes and civic buildings reflect our community's unique cultural heritage and deserve preservation.
- **Prevent height increases near parks and schools.** Casting shadows on open spaces and classrooms undermines the very "well-resourced" character of our district that the City claims to value.
- **Install the emergency firefighting system before more density is built, or a major quake and the ocean winds could result in an unstoppable fire that will run from west to east over all of San Francisco.**

Thank you for your consideration of these points.

Sincerely,

Katherine Howard

Outer Sunset

District 4

From: Stephen Torres
To: Board of Supervisors (BOS)
Subject: Letter Re: Family Zoning Plan
Date: Tuesday, December 2, 2025 3:12:11 PM
Attachments: 2025.12.02.pdf.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Clerk of the Board,

Please see my attached letter regarding items 35-38 in today's agenda.

Best,

Stephen Torres

Stephen Torres
Mission District
San Francisco, California

December 2, 2025

The San Francisco Board of Supervisors
Legislative Chamber, City Hall
San Francisco, California 94102

Dear President Mandelman and Members of the Board of Supervisors,

I am writing today to implore you again not to pass the Family Zoning Plan in its current form. Far from an actual plan, it continues to lack the protections and guidance that should be in a plan for our City's future. Vital amendments that could have mitigated the egregious gaps have been rejected and instead this gives over our control wholesale to developers and private equity with very little in regulation and oversight.

Many of you have held that we can do nothing because our hands are being tied by the state or that we cannot stand in the way of progress. I would like to remind you that you were elected to challenge anything that may negatively impact our communities and to guide community determination over our future, not to acquiesce or remain passive. At a time when power is being consolidated to the most wealthy and private interests at every level of government, voting yes on this plan would send a troubling and dangerous signal to San Franciscans as well as Californians when they should have the most confidence in those who represent them closest to home.

Please vote no on this legislation and work for a more representative and integrative plan for all San Franciscans and challenge any mandate from Sacramento or anywhere that removes our City's voice and determination.

Sincerely,

Stephen Torres
District 8 & 9 Worker
District 9 Resident

From: D7 Youth Council
To: Board of Supervisors (BOS)
Cc: Low, Jen (BOS)
Subject: Letter of Support - File No. 250700 and File No. 250701
Date: Tuesday, December 2, 2025 1:21:15 PM
Attachments: Letter from D7 Youth Council.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors,

Please find attached a letter from the District 7 Youth Council for File No 250700 [Zoning Map - Family Zoning Plan] and File No. 250701 [Planning, Business and Tax Regulations Codes - Family Zoning Plan].

Thank you.

November 18, 2025

District 7 Youth Council
d7youthcouncil@gmail.com

Dear Supervisors,

On behalf of the District 7 Youth Council, we would like to express our support for the Family Zoning Plan. The District 7 Youth Council is a body of 15 youths who live or attend school in District 7. Created by former Supervisor Norman Yee, the District 7 Youth Council looks to provide the District 7 Supervisor with guidance on youth issues. Additionally, it works to improve the conditions for youth across District 7.

We all know it's vital to increase housing across the city. However, as a Youth Council representing San Francisco's youth, we especially recognize the importance of prioritizing increasing density around schools and transit corridors. This is crucial for a number of reasons, but above all, it would reduce commuting times for students and traffic on the street. Public transit thrives with more riders, neighborhood small businesses thrive with more neighbors, and local public schools thrive with more kids.

We would also like to express our support for facilitating 2-4-bedroom housing units to incentivize families to stay and thrive in San Francisco. Currently, developers often find smaller studio and one-bedroom units more financially viable, which makes it difficult for families with children to find appropriate housing in San Francisco. Offering density bonuses and implementing zoning modifications as incentives for developers to build 2-4-bedroom units creates financial incentives that align developers' interests and San Francisco's need for family housing. We support Supervisor Melgar's amendment to exempt buildings with three or more rent-controlled apartments from upzoning. This protection for approximately 84,000 rental units balances both safeguarding existing tenants and affordable housing, while still allowing the development necessary to address the city's housing crisis.

We recognize that development may impact local businesses, and we strongly support funds for small business relocation. We encourage creative solutions like Supervisor Melgar's small business construction relief fund, as well as community donations and fundraisers, to help small businesses relocate and continue serving our neighborhoods. Additionally, we need to prioritize finding affordable family housing strategies and implementing strong tenant protections to ensure that existing residents aren't displaced as we work to create more housing opportunities.

As young citizens of San Francisco, we want to be able to continue to live in our beautiful city. For that reason, the D7 Youth Council, on behalf of youth around the city, supports the family zoning plan.

Sincerely,
Sophia Shen, Andrew Martinovsky, Nicole Lee, Edward Naser, Konrad Kruszka
Housing & Transportation Committee, District 7 Youth Council

From:	Bullock, John (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	BOS-Operations; Carroll, John (BOS); BOS Legislation, (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS)
Subject:	7 Letters Regarding File Nos. 250700, 250701, 250966, and 251072
Date:	Tuesday, December 2, 2025 12:10:14 PM
Attachments:	7 Letters Regarding File Nos. 250700, 250701, 250966, and 251072.pdf

Hello,

Please see attached 7 letters regarding File Nos.:

250700: Zoning Map - Family Zoning Plan
250701: Planning, Business and Tax Regulations Codes - Family Zoning Plan
250966: General Plan Amendments - Family Zoning Plan
251072: Planning, Business and Tax Regulations Codes - Family Zoning Plan

Regards,

John Bullock
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San Francisco Board of Supervisors
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From:	Mchugh, Eileen (BOS)
To:	BOS-Operations
Subject:	Fw: San Francisco Eastern Neighborhoods Democratic Club (SFENDC) Support for Mayor Lurie"s Family Zoning Plan
Date:	Tuesday, December 2, 2025 9:57:18 AM

Get Outlook for iOS

From: Bruce Agid <bruce.h.agid@gmail.com>
Sent: Tuesday, December 2, 2025 9:02 AM
To: Melgar, Myrna (BOS) <myrna.melgar@sfgov.org>; Mahmood, Bilal (BOS) <bilal.mahmood@sfgov.org>; Chen, Chyanne (BOS) <Chyanne.Chen@sfgov.org>; Sherrill, Stephen (BOS) <Stephen.Sherrill@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>; Chan, Connie (BOS) <connie.chan@sfgov.org>; Sauter, Danny (BOS) <Danny.Sauter@sfgov.org>; Dorsey, Matt (BOS) <matt.dorsey@sfgov.org>; Fielder, Jackie (BOS) <Jackie.Fielder@sfgov.org>; Alan.Wong1@sfgov.org <Alan.Wong1@sfgov.org>; Mandelman, Rafael (BOS) <rafael.mandelman@sfgov.org>
Cc: Meaghan Mitchell <Meaghanmitchell@gmail.com>; Tyra Fennell <tyrafennellsf@gmail.com>; Sean Karlin <sean.karlin@gmail.com>; Amerika Sanchez <amerikasanchez@gmail.com>; Charley Goss <charlesbgoss@gmail.com>; Derek Lee <derekjlee27@gmail.com>; Kurt Grimes <kurtb.grimes@gmail.com>; Chris Chang <chriskchang@gmail.com>; Maika Pinkston <maikapinkston@gmail.com>; Latoya Pitcher <ltpitcher@gmail.com>; Spencer Lam <spencerl1296@gmail.com>; Eric Dew <edew@theizegroup.com>; Mark Malouf <mmalouf@teamsters665.org>; Alan Tsui <alant2k@yahoo.com>; Rachael Tanner <r.ann.tanner@gmail.com>; Gary Pegueros <garypegueros@sbcglobal.net>; Chanel Blackwell <chanelblackwell1@gmail.com>; Elijah Ball <elijahiball@gmail.com>; Courtney Sid <courtneysid@gmail.com>; sliubettencourt@gmail.com <sliubettencourt@gmail.com>; JiLon Li <jilonli@gmail.com>; Rupali Singhal <rupa9988@gmail.com>; Carroll, John (BOS) <john.carroll@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Herrera, Ana (BOS) <ana.herrera@sfgov.org>; Burch, Percy (BOS) <percy.burch@sfgov.org>; Yan, Calvin (BOS) <calvin.yan@sfgov.org>; Andrews, Michelle (BOS) <michelle.andrews@sfgov.org>; Tam, Madison (BOS) <madison.r.tam@sfgov.org>; Rosas, Lorenzo (BOS) <Lorenzo.Rosas@sfgov.org>; Low, Jen (BOS) <jen.low@sfgov.org>; Fieber, Jennifer (BOS) <jennifer.fieber@sfgov.org>; Cooper, Raynell (BOS) <raynell.cooper@sfgov.org>; Sciammas, Charlie (BOS) <charlie.sciammas@sfgov.org>; Ho, Calvin (BOS) <calvin.ho@sfgov.org>; DorseyStaff (BOS) <DorseyStaff@sfgov.org>; Waltonstaff (BOS) <waltonstaff@sfgov.org>; Mathew Castillon <mcastillon10@gmail.com>; Lurie, Daniel (MYR) <daniel.lurie@sfgov.org>; Thongsavat, Adam (MYR) <adam.thongsavat@sfgov.org>; Zou, Han (MYR) <han.zou@sfgov.org>
Subject: San Francisco Eastern Neighborhoods Democratic Club (SFENDC) Support for Mayor

Lurie's Family Zoning Plan

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

December 2, 2025

RE: Support Mayor Lurie’s Family Zoning Plan

Dear Members of the Board of Supervisors,

The Board of the Eastern Neighborhoods Democratic Club (ENDC) supports the passage and adoption of Mayor Lurie’s Family Zoning Plan.

This proposal plans to build more housing for San Franciscans while ensuring we can control our own destiny by maintaining local land use controls. Without the Family Zoning Plan, San Francisco will face the Builder’s Remedy as well as fines and loss of ~$100 million in funding for transit and housing. Furthermore, this plan incentivizes family-sized homes of at least two, three, or more bedrooms. These types of homes help more families stay in San Francisco.

The plan aligns with ENDC's Mission & Vision. The San Francisco Eastern Neighborhoods Democratic Club (ENDC) was established by residents of San Francisco’s Supervisorial Districts 3, 6, and 10 to organize voters and provide a discussion and educational forum to address the most pressing issues facing the eastern neighborhoods of our City.

The ENDC provides a Democratic political voice to advocate an urbanist-equity platform (a focus on creating complete communities) with twin goals of keeping current residents and families in San Francisco while welcoming newcomers. The Family Zoning Plan aligns firmly with these values.

We are proud to support the Family Zoning Plan, which incorporates many important accepted amendments, and urge the Board of Supervisors to adopt the plan without delay.

Thanks in advance,

Bruce Agid
President, ENDC on behalf of the Board of ENDC

From:	Richard Drury
To:	Board of Supervisors (BOS); MandelmanStaff (BOS); ChanStaff (BOS); SherrillStaff; SauterStaff; MelgarStaff (BOS); ChenStaff; MahmoodStaff; DorseyStaff (BOS); FielderStaff; Waltonstaff (BOS); Carroll, John (BOS); CPC.SF.Housing.Choice; CPC.FamilyZoningCEQA; Shum, Ryan (CPC)
Cc:	Lori Brooke
Subject:	Family Zoning Plan Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985
Date:	Tuesday, December 2, 2025 9:02:54 AM
Attachments:	2025.12.02.SF Rezone Supoplemental BOS ComLtr-PDF w Exhibit.pdf

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Dear Board of Supervisors:
Attached please find the supplemental comments of Neighborhoods United SF concerning the San Francisco "Family Zoning Plan." Board of Supervisors December 2, 2025. Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985.
Thank you for considering our comments, and please include these comments in the record for this matter.
Richard Drury

--
Richard Drury
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
(510) 836-4200
richard@lozeaudrury.com

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
richard@lozeaudrury.com

BY E-MAIL

December 2, 2025

Board President Rafael Mandelman and
Honorable Supervisors
San Francisco Board of Supervisors
Attn: Angela Calvillo, Clerk of the Board
Land Use and Transportation Committee c/o Clerk John Carroll
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Board.of.Supervisors@sfgov.org
mandelmanstaff@sfgov.org
ChanStaff@sfgov.org
SherrillStaff@sfgov.org
SauterStaff@sfgov.org
MelgarStaff@sfgov.org
ChenStaff@sfgov.org
MahmoodStaff@sfgov.org
DorseyStaff@sfgov.org
FielderStaff@sfgov.org
waltonstaff@sfgov.org
John.Carroll@sfgov.org
Lisa Chen, sf.housing.choice@sfgov.org
Ryan Shum, CPC, cpc.FamilyZoningCEQA@sfgov.org; ryan.shum@sfgov.org

RE: Comment on CEQA Addendum for San Francisco "Family Zoning Plan."
Board of Supervisors December 2, 2025.
Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985

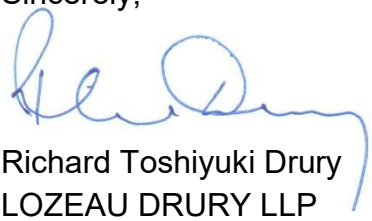
President Mandelman and Honorable Supervisors:

I am writing on behalf of Neighborhoods United SF, a consortium of San Francisco neighborhood and community groups representing thousands of San Francisco residents, concerning the so-called San Francisco "Family Zoning Plan" ("Rezone"). This letter supplements our filing yesterday in which we requested that the Board defer any decision on the Rezone until the City Planning Department prepares a Supplemental Environmental Impact Report ("SEIR").

We attach hereto the shadow "heat map" prepared by Adam Noble of FastCast showing that the Rezone will have dramatic shadow impacts on Joe DiMaggio Park. This is a zero-tolerance park under the City's Prop M (Planning Code Section 295). This is a new significant impact of the Rezone that must be analyzed in an SEIR, along with the

impacts discussed in yesterday's letter. We urge the City to prepare a SEIR to consider feasible mitigation measures to reduce the Rezone's impacts, and also to consider feasible alternatives, such as placing the proposed 4,000 additional units in specific locations, rather than upzoning entire swaths of the city in hopes that the 4,000 units will be built somewhere within the upzoned areas. We do not need to destroy the City to save it. Instead, the necessary new development can be place in areas of the City where it will not destroy rent-controlled housing and where it will not destroy functional, urban communities.

Sincerely,

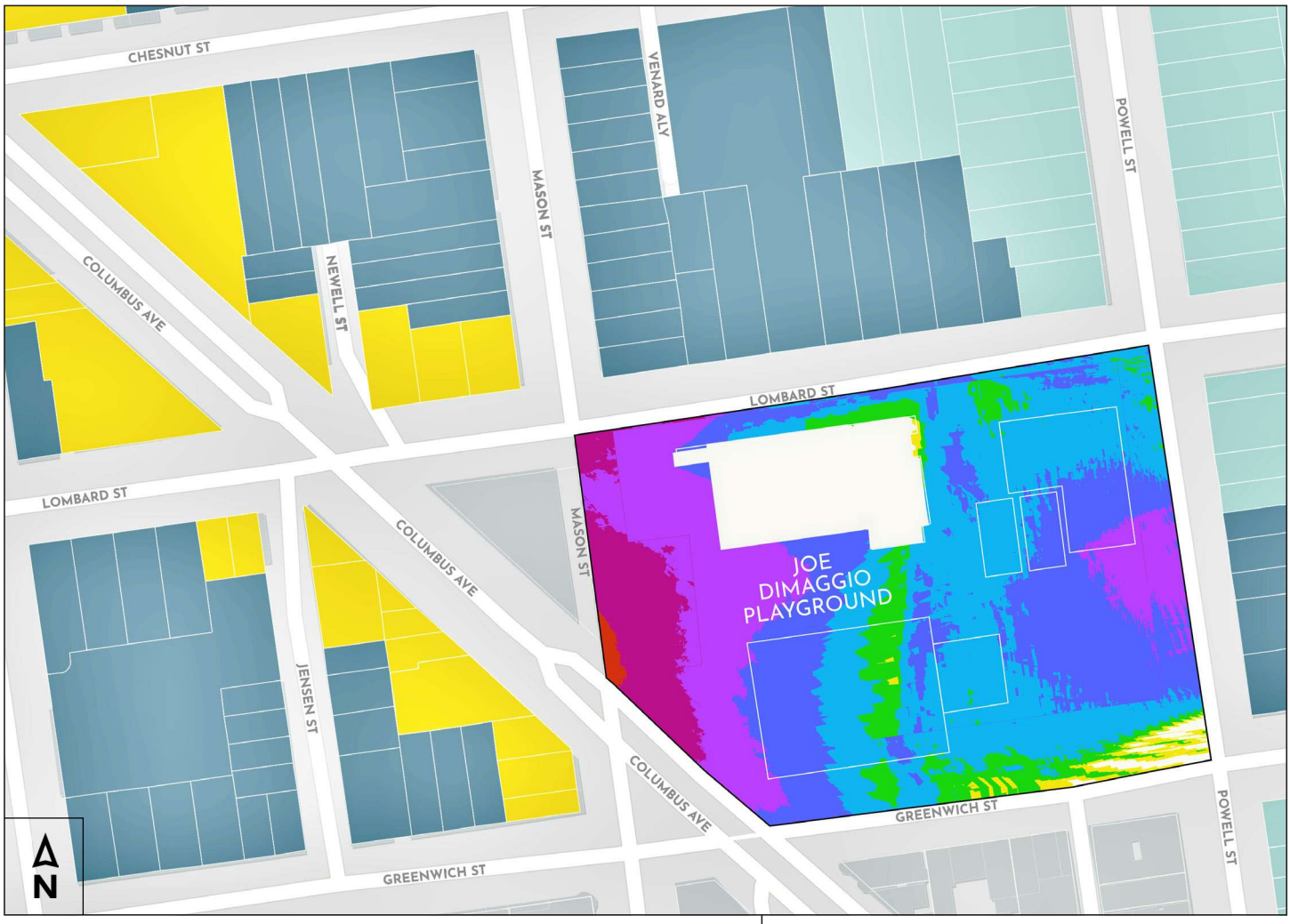


Richard Toshiyuki Drury
LOZEAU DRURY LLP

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

EXHIBIT B



NET NEW SHADOW LOCATIONS & DURATIONS

Full Year Distribution

Duration Range of Net New Shadow

Under 2 min/day	(under 13 hrs/year)
2 - 4 min/day	(13 - 25 hrs/year)
4 - 8 min/day	(25 - 49 hrs/year)
8 - 16 min/day	(49 - 98 hrs/year)
16 - 32 min/day	(98 - 195 hrs/year)
32 - 64 min/day	(195 - 390 hrs/year)
64 - 128 min/day	(390 - 779 hrs/year)
Over 128 min/day	(over 779 hrs/year)

FULL YEAR

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

Joe DiMaggio Playground*

Proposed Local Program Height Limits

40’

50’

65’

Shadow Fan is cropped to park boundaries

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JUNE 21

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JUNE 28

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JULY 5

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

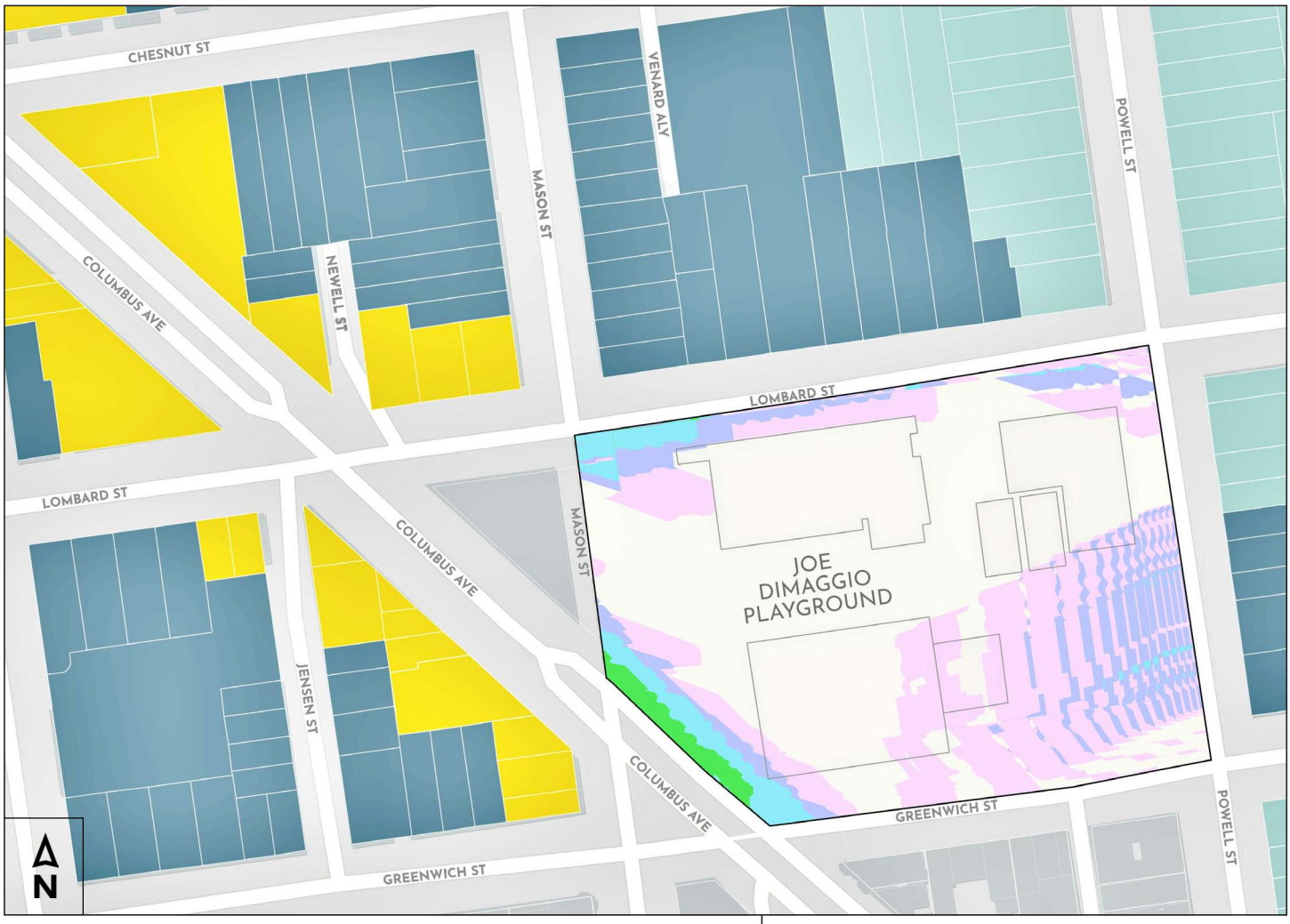
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JULY 12

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

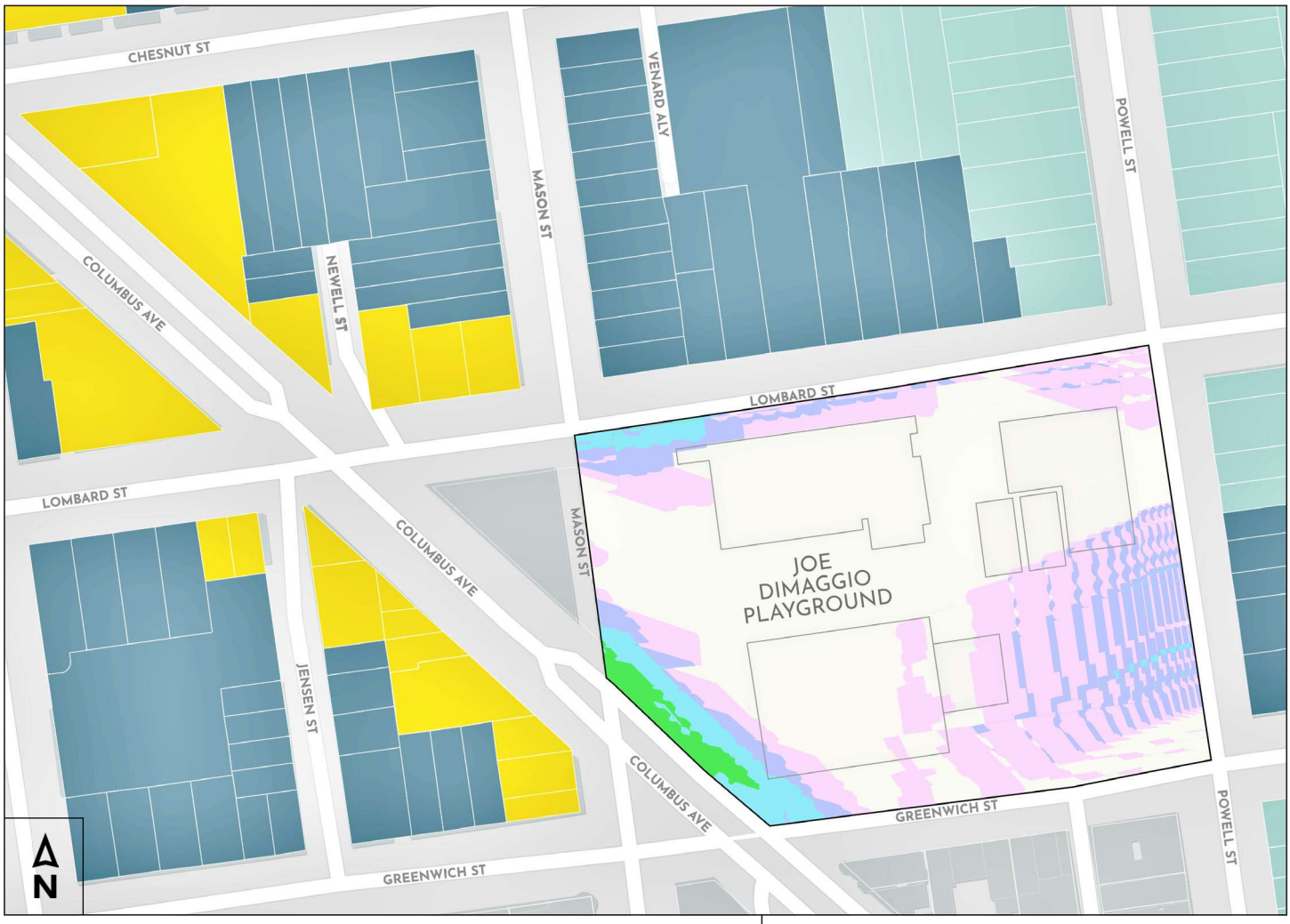
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JULY 19

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

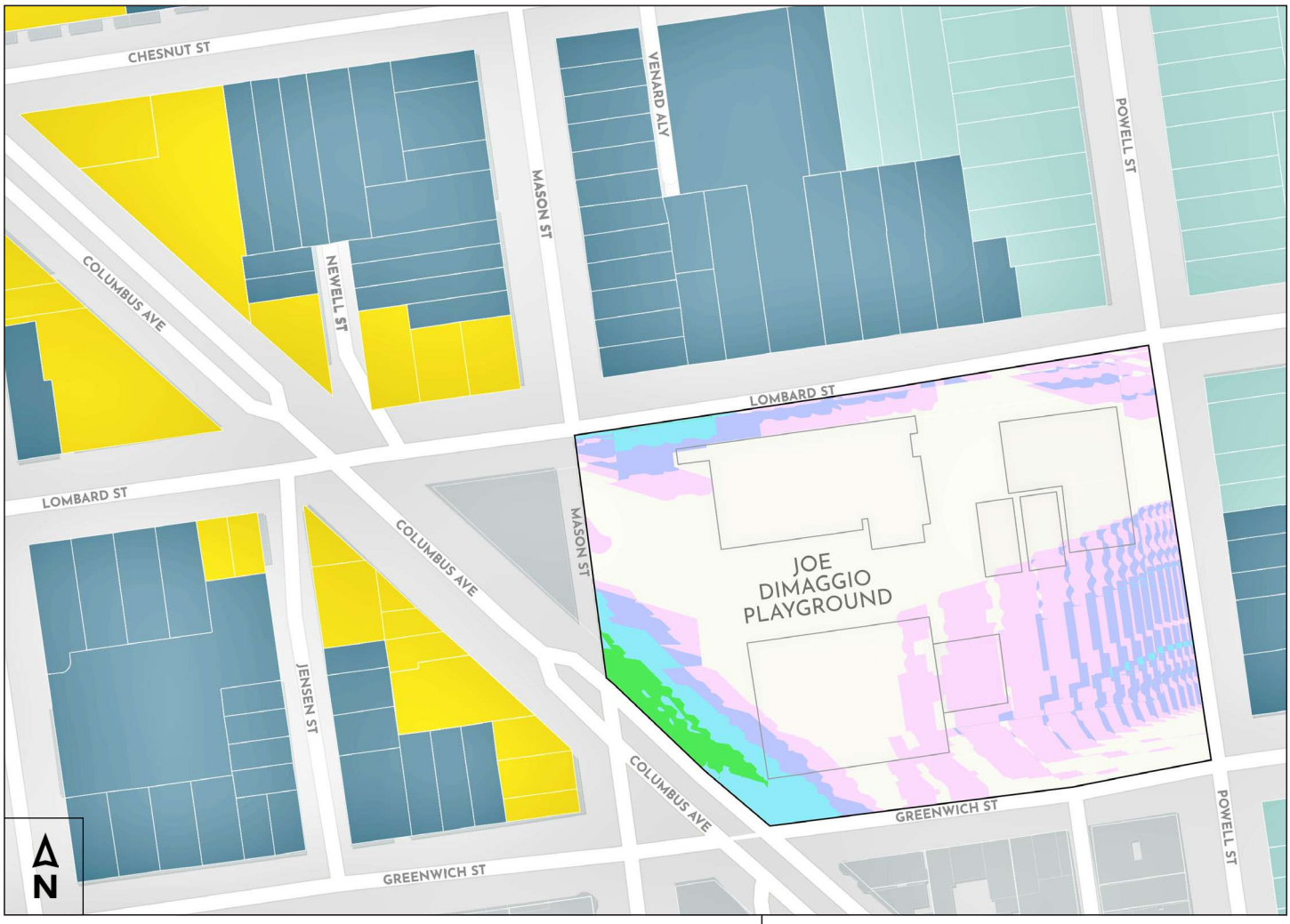
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
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- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JULY 26

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

AUGUST 2

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

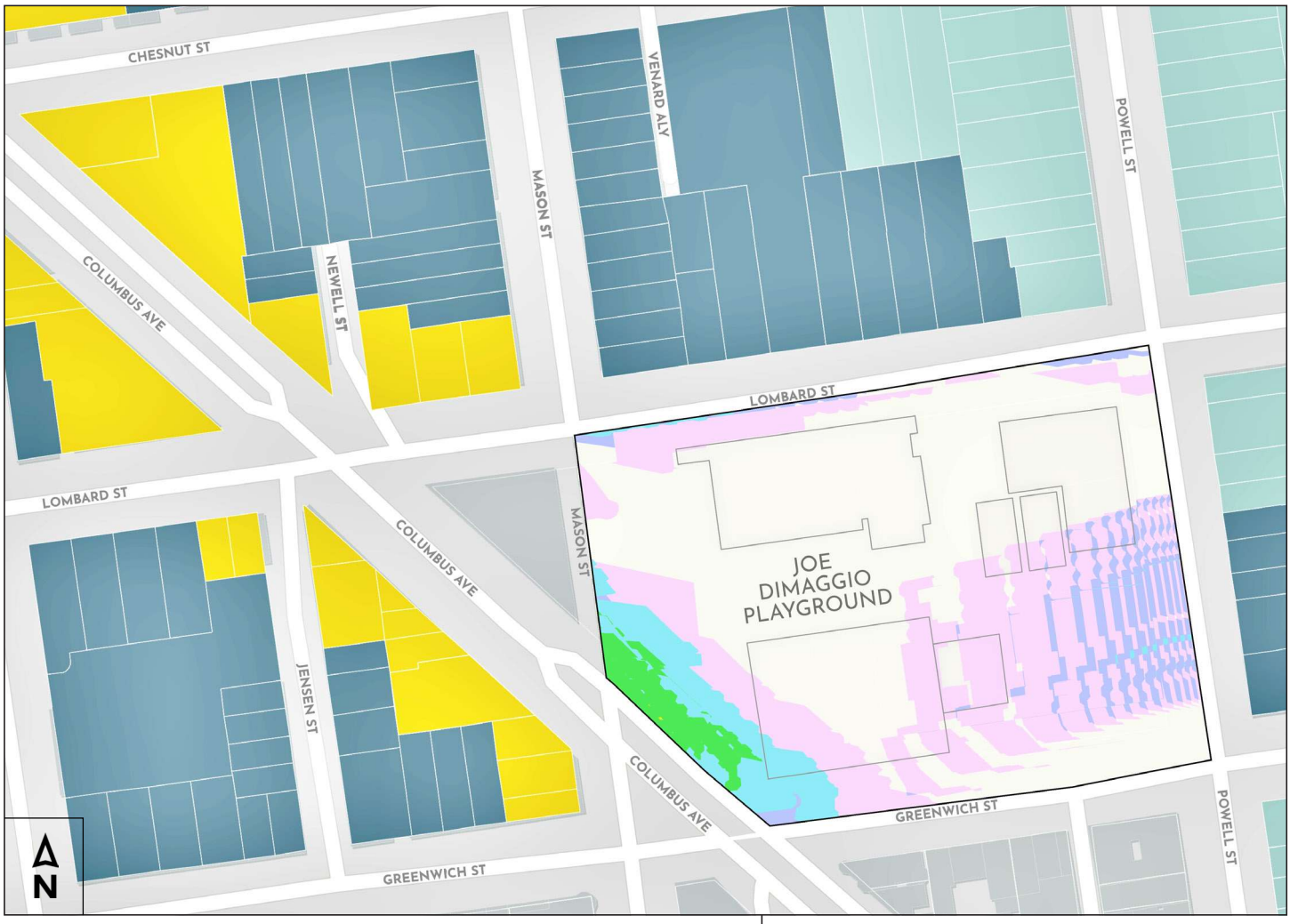
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

AUGUST 9

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

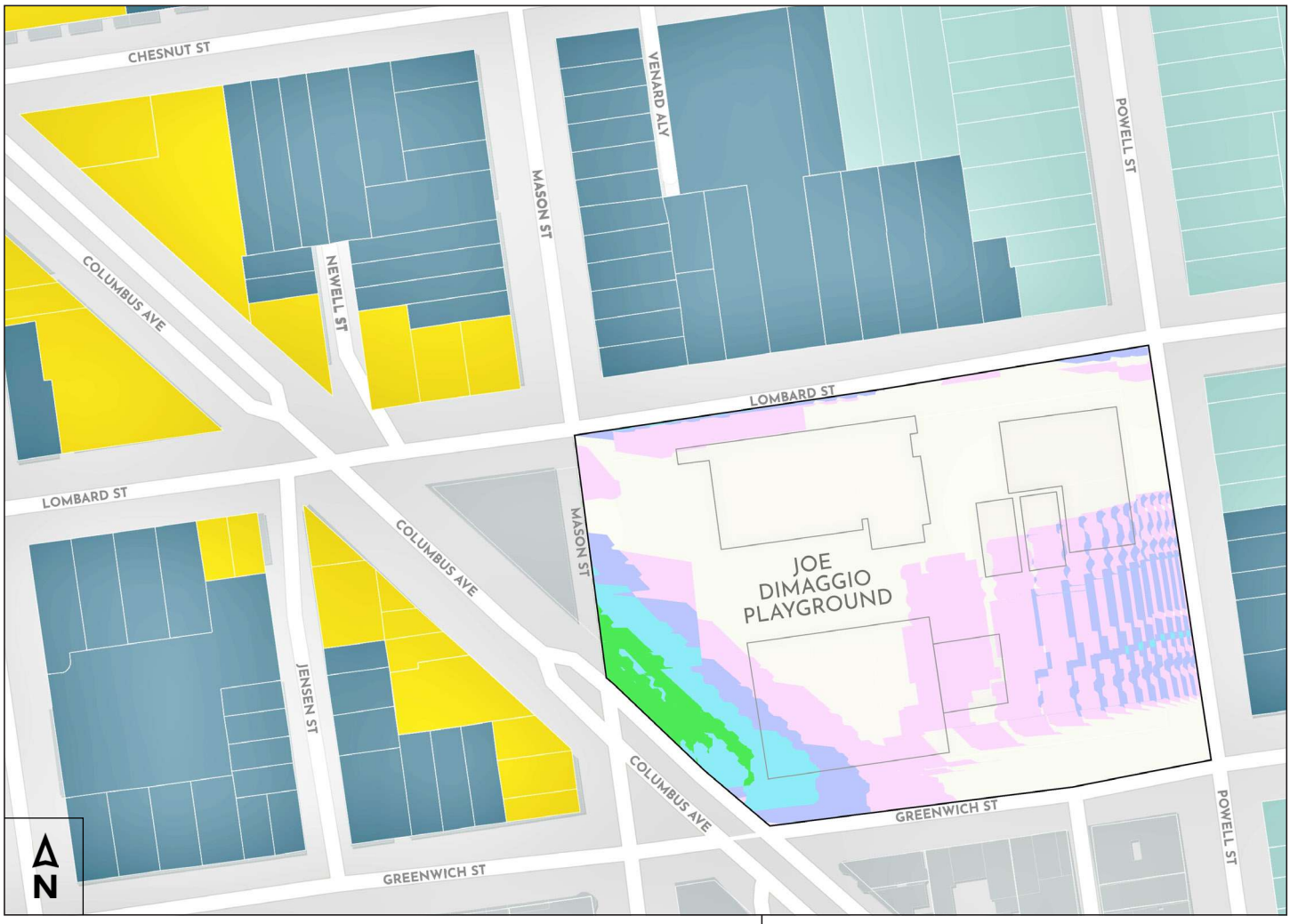
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

AUGUST 16

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

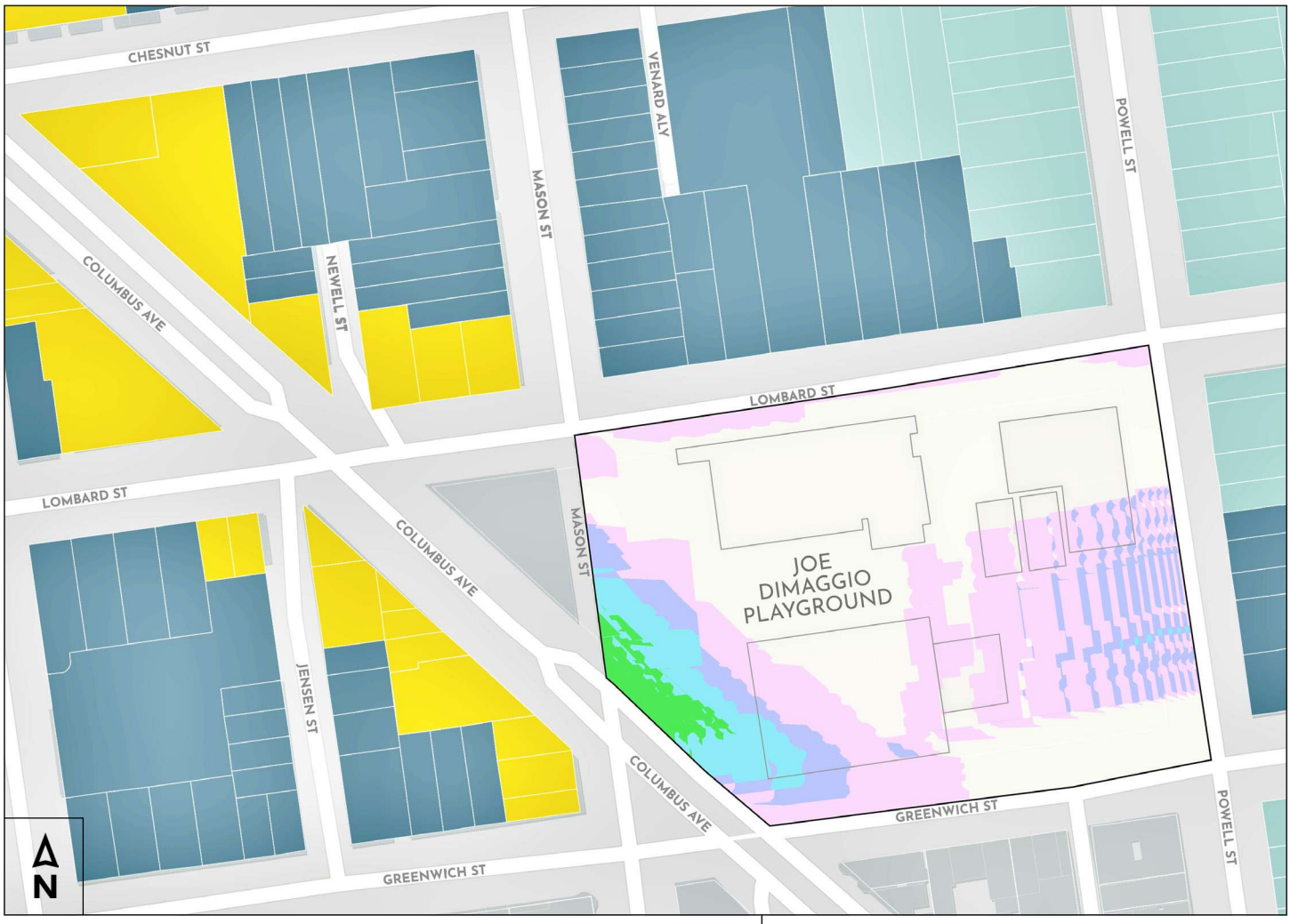
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

AUGUST 23

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

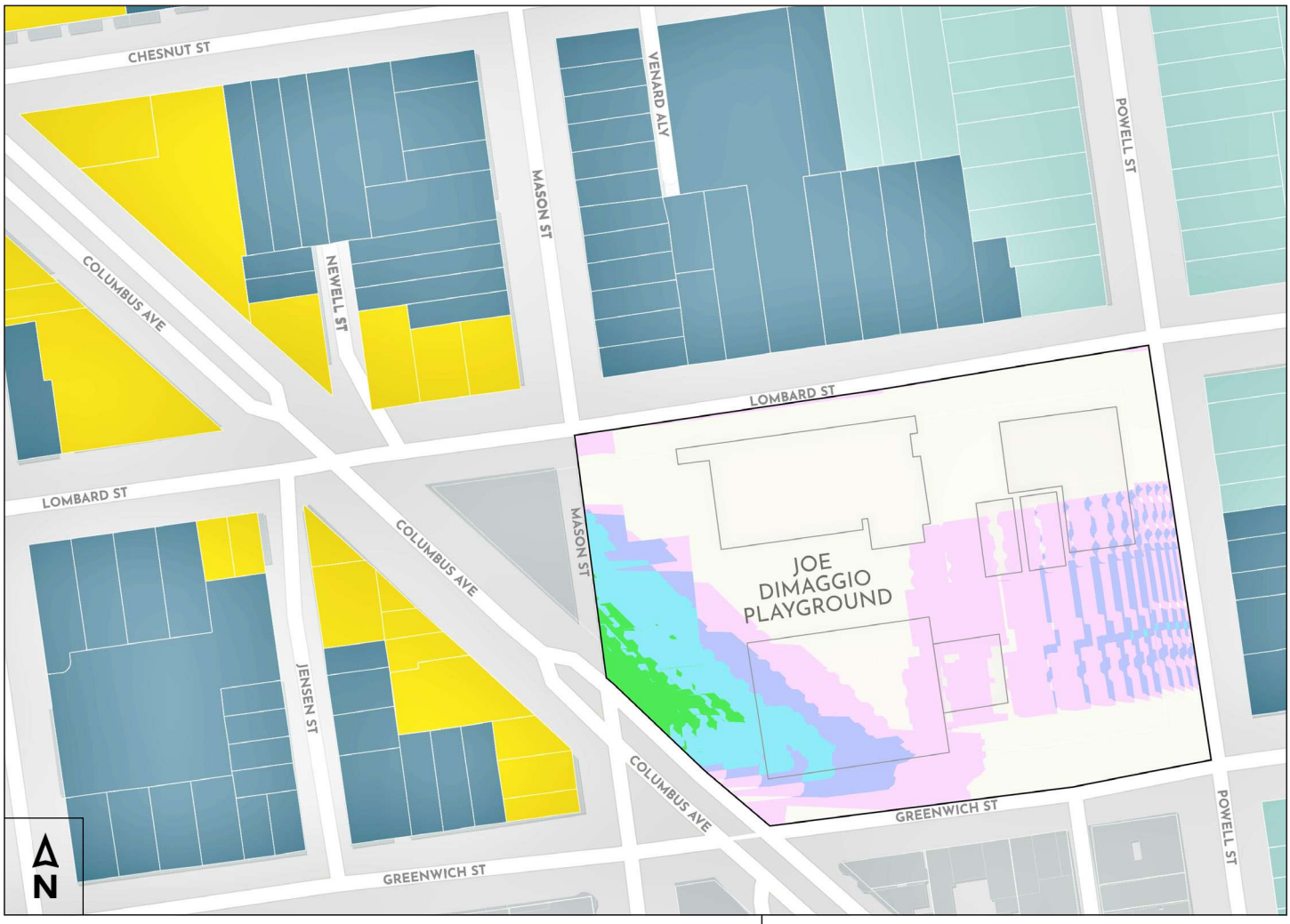
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

AUGUST 30

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

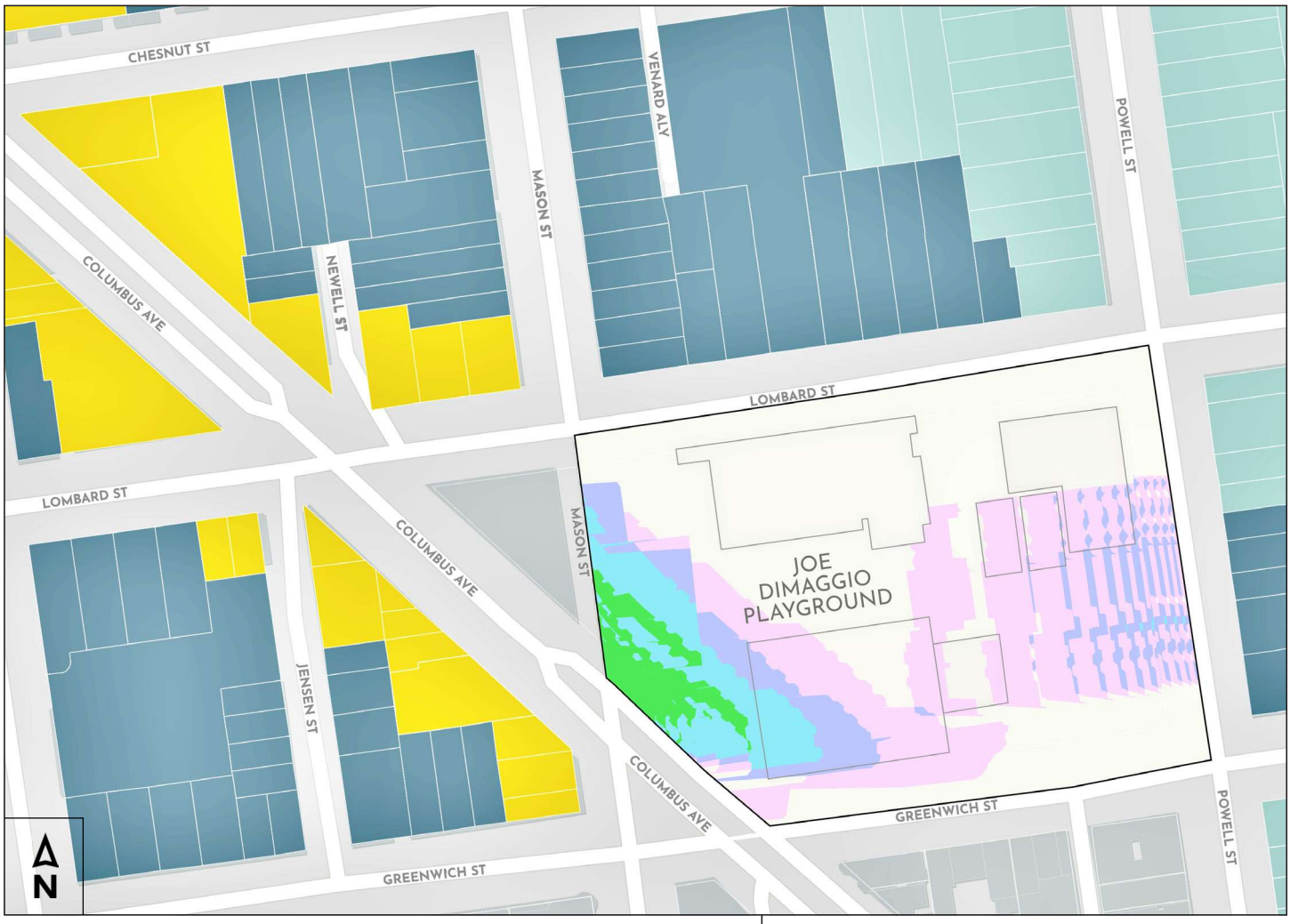
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

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- 1 min - 15 min

SEPTEMBER 6

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

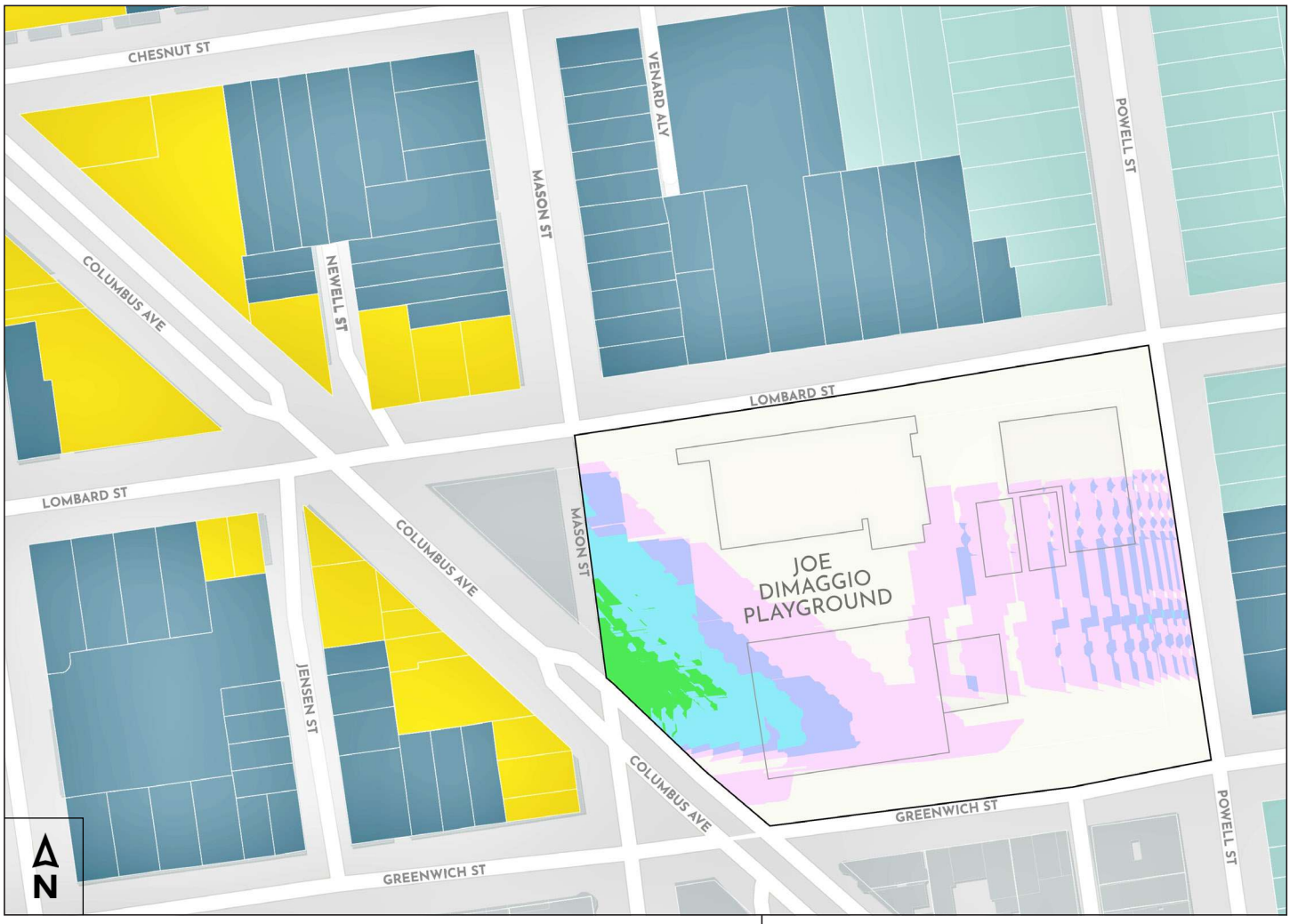
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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- 1 min - 15 min

SEPTEMBER 13

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

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- 8 hr - 16 hr
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- 1 hr - 2 hr
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SEPTEMBER 20

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

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- 8 hr - 16 hr
- 4 hr - 8 hr
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- 1 hr - 2 hr
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- 15 min - 30 min
- 1 min - 15 min

SEPTEMBER 27

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

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- 8 hr - 16 hr
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- 1 hr - 2 hr
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- 15 min - 30 min
- 1 min - 15 min

OCTOBER 4

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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- 1 min - 15 min

OCTOBER 11

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

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- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

OCTOBER 18

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

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- 8 hr - 16 hr
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- 2 hr - 4 hr
- 1 hr - 2 hr
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- 1 min - 15 min

OCTOBER 25

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
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NOVEMBER 1

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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NOVEMBER 8

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

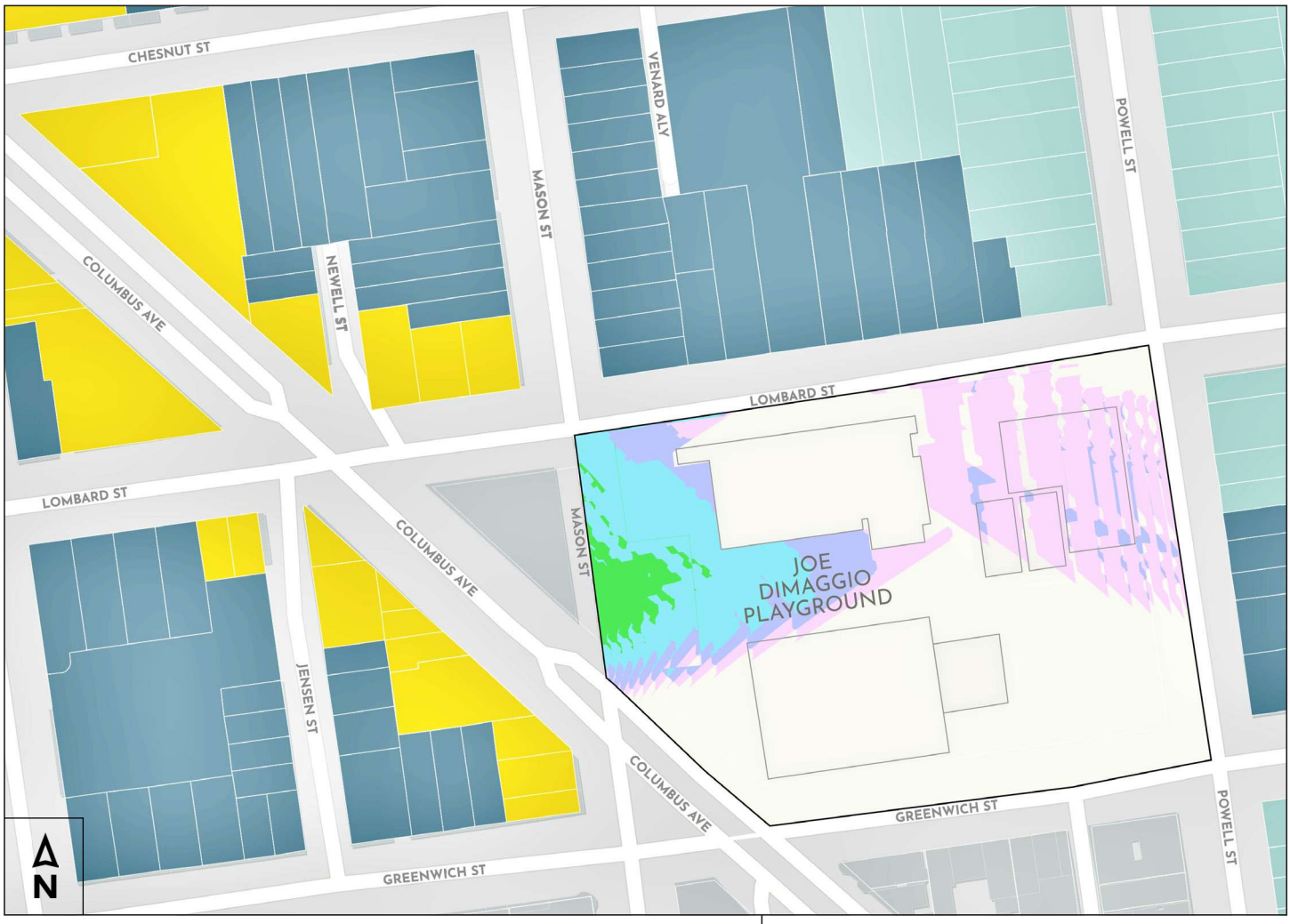
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



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Single Day Distribution

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- 8 hr - 16 hr
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NOVEMBER 15

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

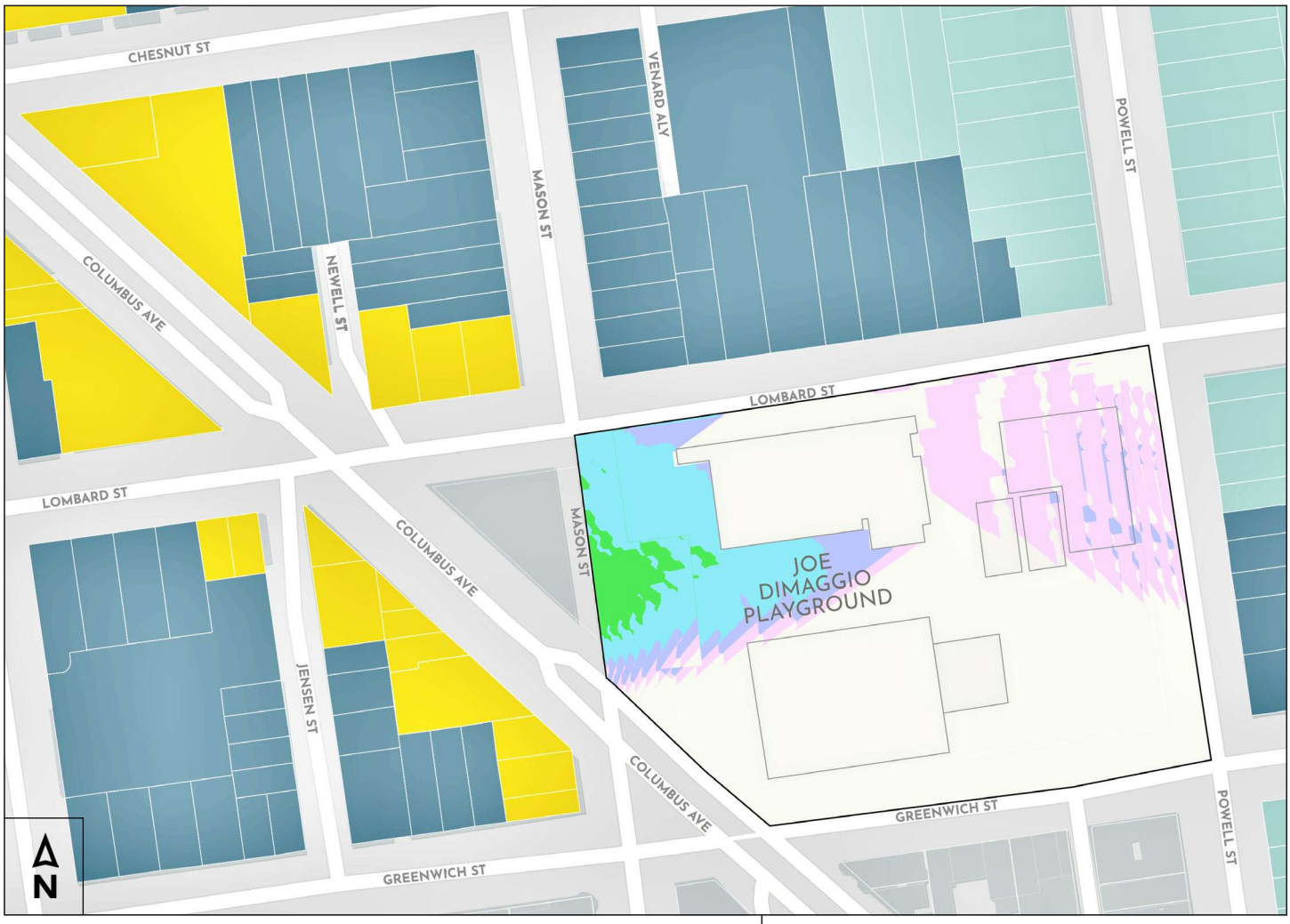
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



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- 8 hr - 16 hr
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- 1 min - 15 min

NOVEMBER 22

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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- 8 hr - 16 hr
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- 15 min - 30 min
- 1 min - 15 min

NOVEMBER 29

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

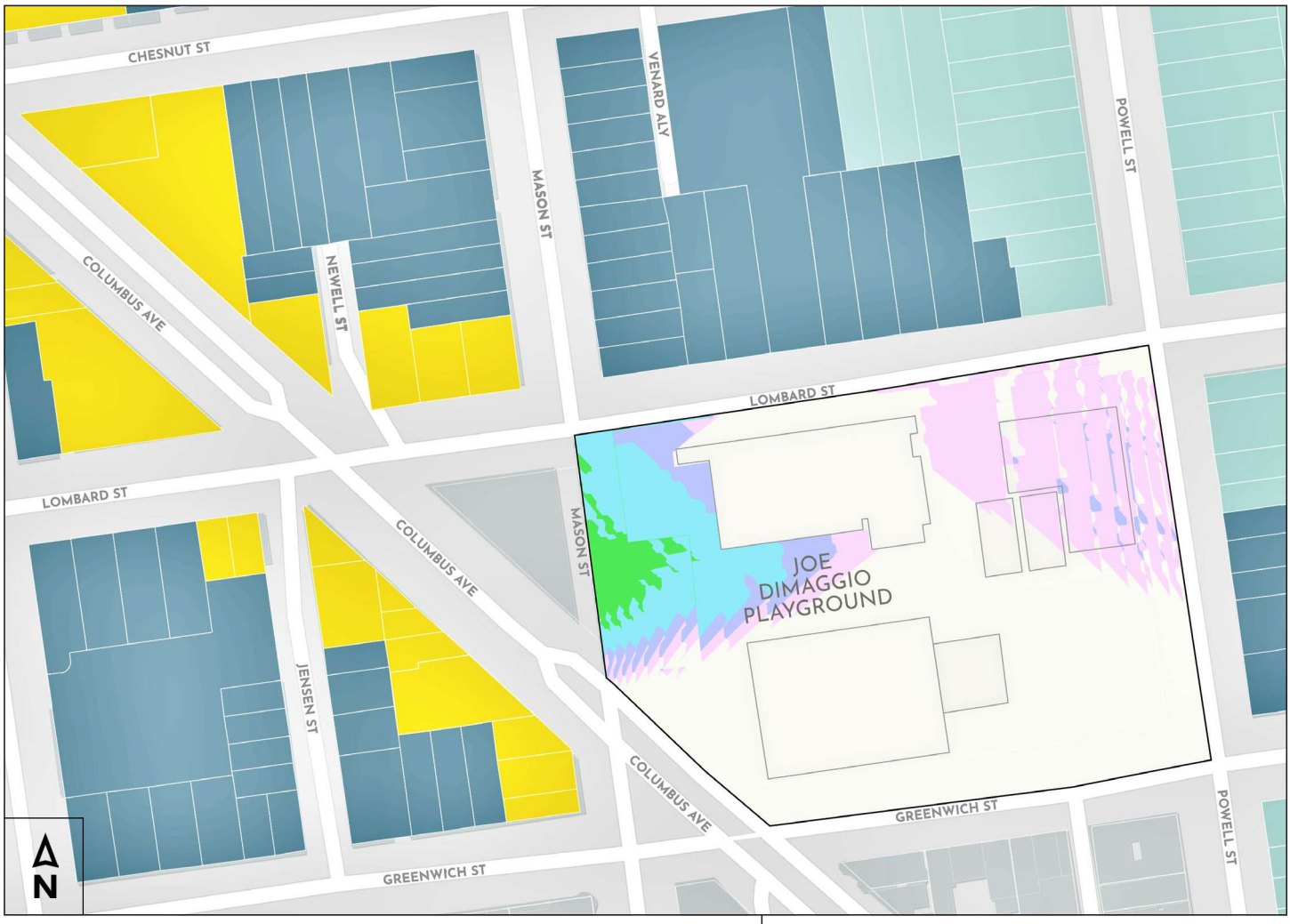
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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DECEMBER 6

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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- 1 min - 15 min

DECEMBER 13

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
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- 1 min - 15 min

DECEMBER 20

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

From: Kathryn Hyde
To: Press Office, Mayor (MYR); Severiano.Christian@sen.ca.gov; Raayan.Mohtashemi@sen.ca.gov
Cc: Carroll, John (BOS); Chan, Connie (BOS); MelgarStaff (BOS); Board of Supervisors (BOS); Hsieh, Frances (BOS); Mandelman, Rafael (BOS); Walton, Shamann (BOS); Andrews, Michelle (BOS); radhika.gawde@sen.ca.gov
Subject: Re: housing SF
Date: Monday, December 1, 2025 6:51:15 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors,

The City Economist's report shows clearly that Lurie's plan will not work and will trigger the State to hijack San Francisco's housing decisions. This is because zoning changes don't produce new affordable housing.

- We do not have the infrastructure, police force, roads, parking and water to support this plan.
- Structures should be limited to 5 stories to preserve lighting and wind

- Much of the new construction is poorly designed - i,e, Haight and Stanyan

- We are only 7 x 7 square miles. SF is not like cities that have space
- Concerns about earthquakes
- There is space to build on vacant lots, Walgreens sites, 7/11 on Clment/9th Ave., etc.
- No buildings close to the shoreline
- We still have 2 months to replace the Mayor's plan with one that will work. Here's a real strategy to solve the City's affordable housing crisis.

I favor producing housing out of existing vacancies and empty office space as much as possible, instead of building new units. New construction uses massive amounts of cement, wood, and diesel construction equipment, releasing more greenhouse gas emissions.

The Mayor's plan would build more excess housing for the wealthy, create more homelessness, and is an environmentally destructive giveaway to rapacious Wall Street and corporate real estate speculators.

Thank you!

Kathryn Hyde
130 Frederick St SF 94117

From:	Kathy Howard
To:	ChanStaff (BOS); ChenStaff; DorseyStaff (BOS); Fielder, Jackie (BOS); MahmoodStaff; MandelmanStaff (BOS); MelgarStaff (BOS); SauterStaff; Walton, Shamann (BOS); SherrilStaff@sfgov.org; Board of Supervisors (BOS); Lurie, Daniel (MYR)
Cc:	Mcgarry, Sean (CPC); Campbell, Amy (CPC); Imperial, Theresa (CPC); Moore, Kathrin (CPC); Braun, Derek (CPC); So, Lydia (CPC); Williams, Gilbert A (CPC); Ionin, Jonas (CPC)
Subject:	BOS: Postpone vote on the "Family" Zoning plan.
Date:	Monday, December 1, 2025 9:11:37 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors,

The entire City voted on District 4's Great Highway, but once again **District 4**, through no fault of our own, **has NO voice in the upzoning legislation**. This is despite the fact that the upzoning legislation could result in bulldozing our entire neighborhood. We have had a new Supervisor all of one day and no easy way to contact him. He has not had time to hold neighborhood meetings; he has not had the opportunity to find out what his district thinks.

You should **postpone this vote** until we have had the opportunity to meet with our new Supervisor. *We are tired of being ignored*.

As to the legislation, many changes must be made:

- **Eliminate in-lieu fees**. In-lieu fees delay affordable housing and create exclusive enclaves of luxury housing.
- **Dedicate all suitable public land – excluding parks and public open space - to 100% affordable housing.**
- **Preserve the Coastal Zone as it is today.**
- **Prohibit upzoning in the Tsunami Zone.** It is reckless to increase building heights or density in areas at high risk of tsunami inundation.
- **Repair and reactivate the local tsunami warning system**.
- **Protect historic and culturally significant buildings, districts and open space.** All **Category A and A-eligible historic buildings, districts, and open space** should be exempted from upzoning. District 4's mid-century homes and civic buildings reflect our community's unique cultural heritage and deserve preservation.
- **Prevent height increases near parks and schools.** Casting shadows on open spaces

and classrooms undermines the very “well-resourced” character of our district that the City claims to value.

- **Install the emergency firefighting system before more density is built, or a major quake and the ocean winds could result in an unstoppable fire that will run from west to east over all of San Francisco.**

Thank you for your consideration of these points.

Sincerely,

Katherine Howard

Outer Sunset

District 4

From: deejoyce@everyactioncustom.com on behalf of Marie D. Joyce
To: Board of Supervisors (BOS)
Subject: Protect Our Neighborhoods — Reject Extreme Upzoning [Files: 250700, 250701, 250966]
Date: Monday, December 1, 2025 9:37:39 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Board of Supervisors,

The Board of Supervisors now faces a Tuesday, 12/2 vote on the most massive zoning changes in San Francisco history. Yet without hearing a single public comment, less than a dozen people could allow sweeping redevelopment along our parks, beaches, waterfronts and thriving commercial corridors. Even more incredulously, one of those supervisors was just appointed today.

A proposal of this magnitude should go before voters on a citywide ballot. Back in 2013, voters resoundingly rejected a proposed "Wall on the Waterfront," which was merely one luxury project on the Embarcadero. But under the "Family Zoning Plan," huge swaths of our northern and western neighborhoods are now targeted - mainly for their potential high-rise iconic views. And this development can only be accomplished with a wrecking ball, which will also displace beloved small businesses and tenant neighbors.

As a 20-year San Francisco resident, I urge you to:.

- Drastically scale back the Mayor's upzoning maps
- Request a postponement of the arbitrary January 2026 upzoning deadline

Mayor Lurie's upzoning maps would impose permanent, irreversible changes to San Francisco's land use — going far beyond what is required, with zero affordability guarantees.

Together, these plans clear the way for mass demolition and luxury towers, prioritizing the interests of developers and billionaire investors while silencing the voices of the very communities they are supposed to represent. This is not planning — it is displacement disguised as progress.

Sincerely,
Marie D. Joyce
San Francisco, CA 94121

From:	Richard Drury
To:	Board of Supervisors (BOS); MandelmanStaff (BOS); ChanStaff (BOS); SherrillStaff; SauterStaff; MelgarStaff (BOS); ChenStaff; MahmoodStaff; DorseyStaff (BOS); FielderStaff; Waltonstaff (BOS); Carroll, John (BOS); FamilyZoningCEQA@sfgov.org
Subject:	CEQA comments for Family Zoning Plan (Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985)
Date:	Monday, December 1, 2025 12:44:59 PM
Attachments:	2025.12.01.SF Rezone BOS ComLtr-PDF w exhibits.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Board of Supervisors and Land Use and Transportation Committee:
Attached please find the comments of Neighbors United SF concerning the Family Zoning Plan, (Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985). Thank you for considering these comments. Please include these comments in the record for this matter.
Richard Drury

--
Richard Drury
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
(510) 836-4200
richard@lozeaudrury.com

LOZEAU DRURY LLP

T 510.836.4200
F 510.836.4205

1939 Harrison Street, Ste. 150
Oakland, CA 94612

www.lozeaudrury.com
richard@lozeaudrury.com

BY E-MAIL

December 1, 2025

Board President Rafael Mandelman and
Honorable Supervisors
San Francisco Board of Supervisors
Attn: Angela Calvillo, Clerk of the Board
Land Use and Transportation Committee c/o Clerk John Carroll
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Board.of.Supervisors@sfgov.org
mandelmanstaff@sfgov.org
ChanStaff@sfgov.org
SherrillStaff@sfgov.org
SauterStaff@sfgov.org
MelgarStaff@sfgov.org
ChenStaff@sfgov.org
MahmoodStaff@sfgov.org
DorseyStaff@sfgov.org
FielderStaff@sfgov.org
waltonstaff@sfgov.org
John.Carroll@sfgov.org
Lisa Chen, sf.housing.choice@sfgov.org
Ryan Shum, CPC, FamilyZoningCEQA@sfgov.org

RE: Comment on CEQA Addendum for San Francisco "Family Zoning Plan."
Board of Supervisors December 2, 2025.
Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985

President Mandelman and Honorable Supervisors:

I am writing on behalf of Neighborhoods United SF, a consortium of San Francisco neighborhood and community groups representing thousands of San Francisco residents, concerning the so-called San Francisco "Family Zoning Plan" ("Rezone"). We request that the Board defer any decision on the Rezone until the City Planning Department prepares a Supplemental Environmental Impact Report ("SEIR"). CEQA review would force the City to consider feasible mitigation measures to reduce the Rezone's impacts, and also to consider feasible alternatives, such as placing the proposed 4,000 additional units in specific locations (such as Park Merced, Stonestown, Treasure Island, Hunters Point, etc.), rather than upzoning entire swaths of the city in hopes that the 4,000 units will be built somewhere within the upzoned areas.

I. INTRODUCTION

The Rezone will forever change the face of the City. It will allow new development to accommodate 54,000 new housing units in so-called "well-resourced" areas of the City.[1] While the City prepared an environmental impact report ("EIR") for its Housing Element in 2022 (2022 EIR), the proposed Rezone is vastly different from the zoning studied in the 2022 Housing Element and its associated 2022 EIR. Nevertheless, the Planning Department proposes to rely on the 2022 EIR.

A rezoning of this magnitude requires thorough environmental review under the California Environmental Quality Act ("CEQA") so that the City's residents and decision-makers can be aware of its impacts, can consider all feasible mitigation measures and alternatives, and can have a robust and open discussion prior to making irreversible changes to San Francisco's landscape for all time. The California Court of Appeal recently held that a supplemental EIR ("SEIR") is required for a general plan amendment that allows taller buildings than allowed by a prior plan (as here), and that the SEIR must analyze all of the increased impacts caused by the taller buildings. (*Save Our Access v. City of San Diego*, 2025 WL 2945714, 115 Cal.App.5th 388 (Cal. Ct. App. Oct. 17, 2025) (*Save Our Access II*); *Save Our Access v. City of San Diego*, 92 Cal.App.5th 819 (2023) (*Save Our Access I*).) Under the *Save Our Access* line of cases, an SEIR is clearly required for the Rezone since it allows vastly taller building heights, and includes different geographic areas than the 2022 Plan.

The Rezone will have myriad significant new impacts that were not analyzed in the 2022 EIR or included in the Housing Element.

- HISTORIC RESOURCES: The Rezone, unlike the Housing Element, will allow new, high-rise development in the historic northeast neighborhoods of North Beach and the Northern Waterfront, including Fisherman's Wharf– something not allowed or analyzed the 2022 EIR or Housing Element.
- HEIGHT LIMITS INCREASED: The Rezone, unlike the Housing Element, includes amendments to base zoning and base height limits, and creating new zoning for many areas. The Rezone will allow the construction of buildings up to 350-feet taller than anything analyzed in the 2022 EIR, resulting in new wind, aesthetic, biological and shadow impacts not analyzed in the 2022 EIR.

[1] While the Rezone purports to address racial disparities in the City by targeting "well-resourced" areas, the Rezone seems to focus on largely Asian "well-resourced" areas, such as the Sunset District, Richmond District, and Northeast, while leaving largely untouched predominantly Caucasian "well-resourced" area such as Pacific Heights, Marina and Seacliff. As such, the Rezone may have discriminatory impacts, much like the development of the Western Addition, or the City's historic bans on wood-framed buildings that targeted Chinese-owned businesses. (See, *Yick Wo v. Hopkins*, 118 U.S. 356, 6 S. Ct. 1064, 1065, 30 L. Ed. 220 (1886).) The City should analyze the potentially racially discriminatory impacts of the Rezone.

- HOUSING SUSTAINABILITY DISTRICT: The Rezone, unlike the Housing Element, establishes a housing sustainability district.
- WIND: The Rezone will create significant new wind impacts from vastly taller buildings, while at the same time the Rezone ordinance proposes to weaken the City's wind ordinance to eliminate the requirement for mandatory wind mitigation, and to redefine significant wind impacts from 1-hour to 9-hours – all of which will conspire to create significant new wind impacts far greater than anything analyzed or contemplated in the 2022 EIR.
- DISPLACEMENT OF RENT-CONTROLLED HOUSING: The Rezone will result in the displacement of rent-controlled tenants and legacy businesses, by replacing rent-controlled and existing affordable units with luxury, high-rise condos and allowing development in the areas within the Priority Equity Geographies Special Use District – something avoided in the 2022 Housing Element.
- AIR POLLUTION: The Rezone will create significant airborne cancer risks in newly identified APEZ zones (air pollutant exposure zones), and will result in criteria air pollution far above CEQA significance threshold set by the Bay Area Air District .
- SHADOW: The Rezone will create significant new shadow impacts due to much taller buildings.
- CONTAMINATED SITES: The Rezone will allow development on contaminated sites not analyzed in the 2022 EIR.
- TRAFFIC: The Rezone will create new significant air quality impacts from increased vehicle miles travelled (VMT), and from construction emissions.
- SEWAGE TREATMENT PLANT: The Rezone will allow development on the site of the North Point Wet Weather Sewage Treatment Facility, which will require either a replacement facility or vast amounts of infrastructure to transport sewage to other plants.
- NORTH BEACH SUD: The Rezone will have cumulative impacts with the recent repeal of the North Beach Special Use District, which removes protections for almost all historic resources in the North Beach area.
- GREAT HIGHWAY CLOSURE CUMULATIVE IMPACTS: The City has failed to analyze new changed circumstances, particularly the closure of the Great Highway, which will exacerbate significant traffic and public transit impacts on the Rezone, which adds thousands of new residential units to the Sunset and Richmond neighborhoods.

It is legally improper for the City to bypass CEQA review for the Rezone. Addenda are only allowed where '(2) Only **minor technical changes** or additions are necessary to make the EIR under consideration adequate under CEQA." (CEQA Guidelines §15164, subd. (a); *Save Our Heritage Organization v. City of San Diego*, 28

Cal. App. 5th 656, 664–65 (2018) (emphasis added). The Proposed Rezone in this case allows **increased height of up to 350-feet above those analyzed in the 2022 EIR**. (Addendum No. 1 to 2022 Housing Element Environmental Impact Report, ("Addendum") at p. 11). The 2022 EIR analyzed building heights of up to 300 feet for proposed buildings, which the Rezone allows building heights of up to 500 to 650 feet – 350 feet taller than anything analyzed in the 2022 EIR. (Addendum 11). These are not "minor technical changes," but rather major substantive changes with significant environmental impacts.

For these reasons, we ask the City to prepare a Supplement EIR to analyze the Rezone, and to consider feasible mitigation measures and alternative to reduce its myriad impacts.

II. PROJECT DESCRIPTION

The Rezone proposes to add 54,000 new housing units to San Francisco, above levels that would occur without rezoning. The City contends that the Rezone is necessary to meet state-mandated Regional Housing Needs Assessment (RHNA) goals of 36,200 additional housing units. The 2022 Housing Element provided for 50,000 new units of housing, so the Rezone allows for significantly more housing – 4,000 additional units. The Rezone moves the proposed housing to different areas of the city where it will have far greater impacts to historic resources, air quality, transportation, displacement and other resources.

We are commenting on the version of the Rezone that has been provided to the public. However, we are aware that the Rezone is in a state of flux, as new amendments are being proposed on an almost daily basis. The Rezone is a moving target, which makes meaningful public comment all but impossible. "An accurate, stable and finite project description is the sine qua non of an informative and legally adequate EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192.) "[A] curtailed or distorted project description," on the other hand, "may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance." (*Id.* See also, CEQA section 15124.) The City has abjectly failed to provide the public with an accurate and stable project description that would allow meaningful comment. At the very least, the City should allow a 30-day public comment period between the first reading of the Rezone Ordinance at the Board of Supervisors, anticipated to occur on December 2, 2025 and the second reading. The Project description will not be stable until the December 2, 2025 vote. This will allow a 30-day period for the public to review and comment on the stable project description.

The Project description in the 2022 EIR simply does not accurately describe the Rezone project. As such, the City may not rely on the 2022 EIR, which describes a very different Project. Some courts have allowed agencies to rely on prior EIRs when the revised project has the same footprint or the same or reduced environmental impacts.

(*Sw. Reg'l Council of Carpenters v. City of Los Angeles* (2022) 76 Cal. App. 5th 1154). However, when, as here, the project's footprint is expanded, the project's height is increased, and/or the project's impacts are increased, a supplemental EIR is required. (*Save Our Access I and II*).

The City largely ignores or mischaracterizes the Rezone's environmental impacts. For example, the Addendum does not even mention the fact that the Rezone (unlike the 2022 Housing Element) will allow redevelopment in the northeast districts of Telegraph Hill, North Beach and the Northern Waterfront, including Fisherman's Wharf. The City also ignores the fact that it has already approved 71,772 new units of housing that have yet to be built. The City' RHNA goal is 82,069. Therefore, the City only needs another 10,297 units to meet its RHNA goal – not 36,200, or 54,000.[2] Nor does the City discuss the fact that the Rezone is likely to displace low-income residents from rent-controlled units, while constructing new market-rate units without rent-control. The Rezone does not require any affordable housing and allows rent-controlled units to be replaced with luxury housing. The net result is likely to be less affordable housing – not more. The City's own calculations show that the Rezone will abjectly fail to meet RHNA's affordable housing goals.

The City fails to accurately describe the Rezone project. The City calculates that the "realistic" projected build-out as a result of the Rezone will be 54,000 additional housing units – 4,000 more than analyzed in the 2022 EIR. However, the Rezone actually creates a capacity for an additional 800,000 housing units. Full build-out would more than double the population of the City. Even the City's own calculations estimate that the Rezone could result in a range of additional housing ranging from 64,000 units (soft sites method); 39,000 units (citywide capacity method); to 19,000 units (financial feasibility method). (SF Planning Dept., Family Zoning Plan Rezoning Capacity Calculations Fact Sheet). Since the City's own staff admits that these are all realistic scenarios, a CEQA document should be prepared to compare the environmental impacts of these feasible outcomes, as well as the full build-out scenario.

The Rezone is vastly different from the Housing Element analyzed in the 2022 EIR. Supplemental CEQA review is required to analyze the impacts created by these vast changes to the Housing Element. These major modifications are discussed in the attached letter from Certified Urban Planner, Deborah Holley. (Exhibit A). Ms. Holley provides a map showing that the Rezone adds massive amounts of new development to District 3 (North Beach, Fisherman's Warf), and District 8 (Mission/Noe Valley), none of which was even mentioned in the 2022 EIR.

- The 2025 Rezone adds 6,938 parcels and 12,150 units, that were not in the 2022 Housing Element.

[2] Housing and Community Development barely accounted for the capacity created by the 4-plex and 6-plex legislation passed in 2023. Roughly 120,000 parcels are eligible, and even a fraction of those converting to 4–6 units would generate hundreds of thousands of potential homes.

- The Rezone increases height on 7,580 parcels and 10,009 units, above heights analyzed in the 2022 EIR.
- The Rezone increases density on 16,135 parcels, with 16,135 units currently on those parcels.
- The Rezone adds 30,653 parcels with 38,692 units that were not analyzed in the 2022 EIR – mostly in District 3 and District 8.
- The Rezone almost doubles the square footage of developable land, increasing the amount by 254,211,574 square feet.

The Rezone opens up thousands of rent-controlled units for high density, market rate development, virtually ensuring that thousands of low-income residents will be displaced to make way for luxury housing. The Rezone includes 3,481 two-unit rent-controlled parcels with 32,237 units, increases height on 4,345 rent-controlled parcels with 26,784 units, an increases density on 1,341 rent-controlled parcels with 20,691 units. While the Board of Supervisors is considering amendments to protect rent-controlled units with 3 or more units, this leaves about 20,564 two-unit rent-controlled units (10,282 parcels) with absolutely no protection from displacement and redevelopment.

None of these impacts were proposed, discussed or analyzed in the 2022 EIR, and must be analyzed and mitigated in a supplemental EIR.

III. LEGAL STANDARD.

A. CEQA Addendum (Pub. Res. Code section 21166).

The City Planning Department proposes to approve the Rezone based on an Addendum to the 2022 Housing Element EIR. This is entirely inappropriate since, as discussed above, the Rezone adds 30,653 parcels that were not analyzed in the 2022 EIR. The proposed Rezone is vastly different from the project analyzed in the 2022 EIR, and will have significant new environmental impacts that must be analyzed in a Supplemental EIR. (SEIR).

The court of appeal has stated, “The addendum is the other side of the coin from the supplement to an EIR. This section provides an interpretation with a label and an explanation of the kind of document that does not need additional public review.” “It must be remembered that an addendum is prepared where ‘(2) **Only minor technical changes or additions are necessary to make the EIR under consideration adequate under CEQA; and (3) The changes to the EIR made by the addendum do not raise important new issues about the significant effects on the environment.**’ (CEQA Guidelines §15164 (a); *Save Our Heritage Organization v. City of San Diego*, 28 Cal. App. 5th 656, 664–65 (2018) (emphasis added).) Even a 15-foot increase in height for a residential building (increasing height from 75 feet to 90 feet) requires a supplemental EIR, not an addendum. “Accordingly, the appropriate protocol is to have the county draft and recirculate a focused supplemental EIR, limited solely to analysis of height and profile-related impacts of the medical clinic, as built and where built to a height of ninety feet.” *Ventura Foothills Neighbors v. Cty. of Ventura*, 232 Cal. App. 4th 429, 434, (2014).

Section 15164(a) of the CEQA Guidelines states that "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Pursuant to Section 15162(a) of the State CEQA Guidelines, a subsequent EIR or Negative Declaration is only required when:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
(C) Mitigation measures or alternatives previously found not to be feasible would, in fact, be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The "fair argument" standard applies to analysis under Section 21166 when the proposed project is outside the scope of the prior EIR. As the Court of Appeal recently held:

> We similarly apply the **fair argument** test to review an agency's determination whether to prepare a **new** or **supplemental EIR** in a later **new project** following certification of a **program EIR**. [Citation.] The Legislature's use of similar language in sections 21151 and 21094 indicate "it intended to establish a similar **low threshold** for an agency's determination **whether to prepare a new EIR** on a later new project that follows certification of a program or plan EIR. In other words, **if** there is **substantial evidence** in the record that the **later project may arguably have** a **significant adverse effect** on the environment

> which was **not examined in the prior program EIR, doubts must be resolved in favor of environmental review** and the agency **must prepare** a **new tiered EIR, notwithstanding** the existence of **contrary evidence**." [Citation.]
>
> (*Save Our Access I*, 92 Cal.App.5th at 860 [citing *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1320–1321] [emph. added].)

As the court held in *Save Our Access I*, a project that allows development of a greater height than analyzed in a prior programmatic EIR, is outside the scope of the prior EIR. (*Save Our Access I*, 92 Cal.App.5th at 845.) Therefore, the "fair argument" standard applies to subsequent projects that exceed the height limits in the program EIR. (*Id*. at 860). A project that includes geographic areas outside the scope of the prior program EIR is also subject to the fair argument standard. (*Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1320–1321). A subsequent project is not within the scope of a previous Program EIR if it is inconsistent with the plan addressed in the Program EIR. (14 CCR § 15168(c)(2); *see* PRC § 21094(b).) "**If the subsequent project is not consistent with the program or plan, it is treated as a new project and must be fully analyzed in a project—or another tiered EIR if it may have a significant effect on the environment.**" (*Friends of College of San Mateo Gardens v. San Mateo County Community College Dist*. (2016) 1 Cal.5th 937, 960 [emph. added]; *Save Our Access I,* 92 Cal.App.5th at 845.)

Since the Rezone allows vast swaths of development outside of geographic areas analyzed in the 2022 EIR, allows building heights of up to 350 taller than analyzed in the 2022 EIR, and allows development of historic resources and contaminated sites not analyzed in the 2022 EIR, the "fair argument" standard applies to the City's use of an Addendum. Under the fair argument standard, an EIR is required if there is a "fair argument" based on substantial evidence that the project may have any significant adverse environmental impacts. Pub. Res. Code § 21080(d).

B. SB 131.

The Addendum briefly argues that the recently passed SB 131 applies to some, but not all, of the Rezone. (Addendum 8). SB 131 exempts from CEQA review "a rezoning that implements the schedule of actions contained in an approved housing element pursuant to subdivision (c) of section 65583 of the Government Code." The City argues that this exemption applies to all but 3.4 percent of the parcels in the Rezone, which are excluded from SB 131 as "natural and protected lands." (Addendum 8).

The City misinterprets SB 131. First, the Rezone does not implement the approved 2022 Housing Element. In fact, the Rezone is flatly inconsistent with the 2022 Housing Element. Most obviously, the 2022 Housing Element included almost no new development in the historic Northeast sector of the city (800 units), while the Rezone allows 5,900 units in that area. (Addendum 19). The 2022 Housing Element provided for negative 1,800 units in Downtown, while the Rezone placed 500 units in the Downtown area. (Id.). The Rezone placed 2,800 additional units in the Western Addition. Also, the

Rezone allows construction of buildings up to 350 taller than allowed by the Housing Element. As discussed above, the Rezone adds 30,653 parcels that were not analyzed in the 2022 EIR. Since the Rezone is inconsistent with the 2022 Housing Element, SB 131 does not apply at all.

Second, SB 131 provides that it does not apply to "natural and protected lands," and the Rezone admittedly includes numerous parcels that meet this definition. (Pub. Res. Code § 21080.085).

> (a) This division does not apply to a rezoning that implements the schedule of actions contained in an approved housing element pursuant to subdivision (c) of Section 65583 of the Government Code.
> (b) (1) Subdivision (a) does not apply to either of the following:
> (B) A rezoning that would allow for construction to occur within the boundaries of any natural and protected lands as defined pursuant to Section 21067.5.
> (2) (A) (i) Subdivision (a) applies to a rezoning that contains within its boundaries any natural and protected lands as defined pursuant to Section 21067.5 if those natural and protected lands are excluded from the rezoning.
> (ii) The definition of "natural and protected lands" described in clause (i) does not include the lands described in subdivision (p) of Section 21067.5.
> (B) The rezoning of any parcel or portions of a parcel that is excluded from a rezoning under this paragraph shall be a separate project that is subject to this division.
>
> Public Resources Code §21067.5 defines "natural and protected land" as follows:
>
> "Natural and protected lands" means sites located within any of the following locations:
> (a) The state park system, as described in Article 1 (commencing with Section 5001) of Chapter 1 of Division 5.
> …
> (i) A hazardous waste site that is listed pursuant to Section 65962.5 of the Government Code or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code, unless either of the following apply:
> (1) The site is an underground storage tank site that received a uniform closure letter issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code based on closure criteria established by the State Water Resources Control Board for the use proposed by the project. This paragraph does not alter or change the conditions to remove a site from the list of hazardous waste sites listed pursuant to Section 65962.5 of the Government Code.
> (2) The State Department of Public Health, State Water Resources Control Board, Department of Toxic Substances Control, or a local agency making a determination pursuant to subdivision (c) of Section 25296.10 of the Health and Safety Code has otherwise determined that the site is suitable for the use proposed by the project.

> (j) Within a regulatory floodway as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency, unless the development has received a no-rise certification in accordance with Section 60.3(d)(3) of Title 44 of the Code of Federal Regulations.
> …
> (m) An environmentally sensitive area within the coastal zone, as defined in Section 30107.5…

The Addendum admits that at least 3.4 percent of the Rezone area are "natural and protected lands," within the meaning of SB 131. The Upzoning Plan includes several Cortese List contaminated sites. Several of these sites are "active," meaning that they have not be remediated. We have retained a hazardous materials expert to identify all of the Cortese List sites covered by the Upzoning. But we have already identified at least nine active Cortese List sites in our informal review, including 1100 JUNIPERO SERRA BLVD; and 300 W PORTAL AVE. The Rezone also includes parcels in listed flood zones. The Rezone also includes environmentally sensitive areas in the Coastal zone. These areas are expressly excluded from SB 131 and render the entire Rezone project ineligible for an SB 131 exemption.[3]

IV. CEQA ANALYSIS.

A. HISTORIC RESOURCES.

The Rezone will have significant historic resources impacts that were not analyzed in the 2022 EIR. The 2022 EIR found significant and unmitigated impacts to historic resources, (Addendum 60), but the Rezone's impacts are far greater and also significant and unmitigated. (Addendum 61). Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).)

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[3] The Addendum suggests that it can review the Rezone using a hybrid approach – reviewing the natural and protected lands under CEQA section 21166, and the remainder of the Project under SB 131. However, CEQA prohibits such a schizophrenic analysis. Under CEQA, the agency must review the "whole of the action" in a single document. A "project" is "the whole of an action" directly undertaken, supported, or authorized by a public agency "which may cause either a direct physical change in the environment, or a reasonably foreseeable ***indirect*** physical change in the environment." (PRC § 21065; CEQA Guidelines, 14 CCR § 15378(a).) A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole. "The requirements of CEQA, 'cannot be avoided by chopping up proposed projects into bite-size pieces which, individually considered, might be found to have no significant effect on the environment or to be only ministerial.' [Citation.]" (*Topanga Beach Renters Assn.* v. *Department of General Services* (1976) 58 Cal.App.3d 188, 195-196 [129 Cal.Rptr. 739].)

We submit herewith the comments of Architectural Historian Bridget Maley, former President of the San Francisco Landmarks Advisory Board. (Exhibit B). She states:

> The Rezone would result in a myriad of significant new impacts that were not analyzed in the 2022 EIR or included in the Housing Element, not the least of which are impacts to historic resources. The Rezone will have significant historic resources impacts that were not analyzed in the 2022 EIR. The 2022 EIR found significant and unmitigated impacts to historic resources, but the Rezone's impacts are far greater, with significant and unmitigated impacts. Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).)
>
> The Rezone allows high-rise development on, near, or within areas that contain historic resources. Many of these areas were not included for development in the 2022 Housing Element, and the impacts of this potential development on historic resources was not analyzed in the 2022 EIR.
>
> Further, the Rezone includes the following language related to Bonuses for "Historic Preservation." However, these bonuses, as shown below, encourage height increases, facadism, and other over-scaled additions that would result in diminished historic fabric and result in unintended impacts to historic resources. Additionally, this proposed legislation added at the last minute in the September 11, 2025 version of the legislation, and has not been evaluated in the Addendum or in a SEIR.
>
> (Maley at 2-3).

Maley goes on to discuss provisions of the Rezone that encourage development of historic buildings. She states, "This late addition to the legislation has the great potential to cause impacts to historic resources, instead of preserving them, as it would allow large sections of historic buildings to be demolished and over scaled additions and height increases to be implemented as bonuses. For the reasons listed above, it is my professional opinion that the Rezone, if approved, would have potentially significant environmental impacts that must be analyzed and mitigated under the California Environmental Quality Act ("CEQA") through a full recirculated SEIR." (Id. at 4).

The 2022 EIR assumed that historic buildings (Category A resources) would not be redeveloped for housing. (2022 EIR, App. C, pp. 10, 17). The 2022 EIR stated, "The department's housing growth projection factored in the locations of known historic districts in San Francisco and assumed that future development would primarily occur outside those districts." (2022 EIR p. 4.2-82). The HE EIR conceded that its "analysis cannot anticipate the exact manner in which future construction may be designed or whether such projects will propose altering or demolishing historic resources." (2022 EIR p. 4.2-85.) The 2022 EIR stated:

> The representative pattern of growth depicted in the department's projection of future housing units under the Housing Element 2022 Update takes into account

> the presence of individual built-environment historic resources and historic districts identified as of 2021 (including resources designated or found eligible for listing in local, state, and federal historic resource registers). Specifically, the projection assumes future housing construction would be less likely to occur on parcels that currently contain Category A resources (i.e., properties that are already known to qualify as historic resources)... This assumption reflects that Category A resource status would act as a development constraint for future housing development construction. Additionally, the planning department did not increase height limits in historic districts identified in [the Planning Code]. (2022 EIR, App. C, pp. 10, 17.)

However, the Rezone now identifies numerous historic resources for upzoning for residential development, contrary to the analysis in the 2022 EIR.

The 2022 EIR concluded that any impacts to historic resources would be significant even after mitigation. By increasing impacts to historic resource, the 2025 Rezone will have "significant effects previously examined will be substantially more severe than shown in the previous EIR," and a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).) The 2022 EIR concluded that even with the implementation of mitigation, impacts to "project-level and cumulative: built-environment historic resources" would be significant and unmitigated. (2022 EIR p. S-4.) "Because demolition of built-environment historic resources or alteration in an adverse manner could still occur, the impact would be significant and unavoidable with mitigation." (2022 EIR, p. 4.2-100.)

In *Communities for a Better Environ. v. Calif. Resources Agency* (2002) 103 Cal.App.4th 98 at 122-125 (*CBE v. CRA*), the court held that when a "first tier" EIR admits a significant, unavoidable environmental impact, a lead agency must prepare second tier EIRs for later projects to ensure that those unmitigated impacts are "mitigated or avoided." (Id.) The court reasoned that the unmitigated impacts were not "adequately addressed" in the first tier EIR since they were not "mitigated or avoided." (Id.) Thus, significant effects disclosed in first tier EIRs will trigger second tier EIRs unless such effects have been "adequately addressed," in a way that ensures the effects will be "mitigated or avoided." (Id.) Such a second tier EIR is required even if the impact still cannot be fully mitigated and a statement of overriding considerations will be required. The court explained, "The requirement of a statement of overriding considerations is central to CEQA's role as a public accountability statute; it requires public officials, in approving environmentally detrimental projects, to justify their decisions based on counterbalancing social, economic or other benefits, and to point to substantial evidence in support." (Id. at 124-125.) Since the 2022 EIR determined that impacts to historic resources would be significant and unmitigated, supplemental CEQA review is required for the 2025 Rezone, which increases impacts to historic resources.

The Rezone allows high-rise development in the Northeast Sector of the City, including in the historic district of North Beach. These areas were not included for development in the 2022 Housing Element, and the impacts of this development on historic resources was not analyzed in the 2022 EIR. By moving over 5000 units of new housing to this area, the Rezone exacerbates the impact on historic resources. Since this

is “one or more significant effects not discussed in the previous EIR,” (CEQA Guidelines 15162(a)(3)(A)), a supplemental EIR is required to analyze and mitigate this impact. Since this impact is beyond the scope of the 2022 EIR, it is subject to the fair argument standard.

The Housing Element EIR Addendum fails to analyze impacts of additional height and density increases, as well as changes in zoning use districts, on designated historic resources or historic districts or areas with known concentrations of “A” rated historic resources, but not yet designated as historic districts. Bridget Maley’s letter includes a listing of historic resources adversely affected by the Rezone. Impacts to these historic resources were not analyzed in the 2022 EIR and must be analyzed in a Supplemental EIR. That list included herein by reference. It includes, but is not limited to:

- Fully documented North Beach National Register Historic District submitted to the State Historic Preservation Office and awaiting hearing by the State Historical Resource Commission was not included in the 2022 Housing Element or analyzed in the 2022 EIR .The Rezone could have significant impacts to this identified historic district, including heights rezoned from 40 feet to 50 feet in block Block 0076.
- Designated Northeast Waterfront Article 10 Historic District.
- Eligible Washington Square Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Eligible Upper Grant Avenue Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR .
- Designated Otis Elevator Company National Register No. 99001265 (1 Beach Street; Parcel 0018/001).
- Designated Grabhorn Press Building National Register No. 97000349 (1335 Sutter Street; Parcel 0690/012A).
- Designated Thomas Payne House National Register No. 80000847 (1409 Sutter Street; Parcel 0689/025). This parcel is rezoned from its existing height limit of 130 feet to 500 feet.
- Designated Washington Square Article 10 Landmark No. 226 (1651 Stockton Street and Filbert Street; 0102/022001) . The parcels on the northern edge of Washington Square are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the 2022 EIR . This could result in significant impacts to this park.
- Temple Sherith Israel National Register #10000114 (2266 California St., Parcel 0637/011).

- Designated Cable Car National Register Historic District No. 66000233. The Cable Car lines located within areas being upzoned and/or density decontrolled by the Upzone Plan could be significantly impacted.
- Designated Grace Cathedral Article 10 Landmark No. 170 (1100 California Street; Parcel 0246/001). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR.
- Designated Old Flood Mansion, Pacific Union Club, both Article 10 Landmark No. 64 and National Register No. 66000230 (1000 California Street; Parcel 0245/001).
- Historic Category "A" rated buildings across the city would be impacted by the Rezone as it affords no protection for these previously identified but not designated historic resources. The City of San Francisco Planning Department has previously required full Historic Resource Evaluations for projects involving Category "A" rated buildings. This policy change was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Casebolt House Article 10 Landmark No 51 (2727 Pierce Street, Parcel 0560/005). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Spreckels Residence Article 10 Landmark No. 197 (2080 Washington Street, Parcel 0601/005. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.
- Haas-Lilienthal House Article 10 Landmark No. 69 and National Register No 730000438 (2007 Franklin St. 0600/002). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.
- Sacred Heart Parish Complex Article 10 Landmark No.316 and National Register 10000112 (660 Oak Street, Parcel 0828/012; 735 Fell Street, Parcel 0828/022A; 554 Filmore Street, Parcel 0828/22; and 546-548 Filmore Street, Parcel 0828/21). The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the EIR.
- Many other historic buildings listed in letter of Bridget Maley.

B. HEIGHT AND RELATED IMPACTS.

The Rezone will allow construction of buildings up to 350-feet taller than analyzed in the 2022 EIR. The 2022 EIR analyzed building height ranging from 55 feet to 300 feet high. (Addendum 11). The Rezone allows building heights up to 500 feet high, and up to 650 feet high in two areas. (Addendum 11). These taller buildings are beyond the scope of the 2022 EIR, triggering the fair argument standard of review, as in the *Save Our Access* cases, discussed above. As the court of appeal held in *Save Our Access II*, supplemental CEQA review is required to analyze all of the impacts stemming from the greater building heights allowed by the Rezone.

1. Biological Impacts.

The Addendum admits that taller buildings may have biological impacts by obstructing flight paths of birds and impacting movement of special status species. (Addendum 48-49). The 2022 EIR found biological impacts to be less than significant. Since the Rezone will have significant biological impacts, the project will have "one or more significant effects not discussed in the previous EIR," (CEQA Guidelines 15162(a)(3)(A),) and a supplemental EIR is required.

The 2022 EIR did not analyze biological impacts since it found the impact to be less than significant. (2022 EIR, p. 4.1-1.) Since the EIR found biological impacts to be less than significant, it imposed no mitigation measures. (2022 EIR, p. 4.1-149.) Since biological impacts were not examined as significant effects in the 2022 EIR, CEQA review is now mandated because the project will have one or more significant effects not discussed in the previous EIR or negative declaration. (CEQA Guildelines 15163(a)(3)(A)).

Expert wildlife biologist Dr. Smallwood, Ph.D., concludes that the 2025 Rezone will have significant biological impacts not analyzed in the 2022 EIR. (Exhibit C). Dr. Smallwood concludes that by adding 4,000 additional residential units, changing the spatial distribution of the buildings, and increasing building heights, that the Rezone will have greater impacts on birds than the 2022 Plan. In particular, he concludes that the Rezone will have greater impacts on bird-window collisions, and that these impacts will not be adequately mitigated by the City's bird-safe window requirements. (Smallwood at 2-3). Dr. Smallwood states, "the additional 4,000 residential units could result in very large numbers of collision fatalities despite implementation of the City's Standards for Bird-Safe Buildings." (Id. at 3).

Dr. Smallwood notes that San Francisco includes areas in the Pacific Flyway and areas that are rich in biological diversity. He states, "San Francisco is situated within the Pacific Flyway, which is one of the most intensely used bird migration pathways in the world." (Id. at 13). He states that "there are 147 special-status species of wildlife documented near enough to the project site to warrant a closer look at their occurrence likelihoods for the purpose of predicting potential project impacts." (Id.at 3). Dr. Smallwood concludes that the 2025 Rezone will result in 7,095 additional bird fatalities each year compared to the 2022 Plan, to a 95% confidence level. (Id. at 12). Dr. Smallwood concludes:

> Nearly all predicted deaths would be of birds protected under the Migratory Bird Treaty Act and under the California Migratory Bird Protection Act, thus causing significant impacts. Given the predicted level of bird-window collision mortality, it is my opinion that the proposed project would result in potentially significant adverse biological impacts, including the unmitigated take of aerial habitats of birds, bats and other volant wildlife. Not only would the project take habitat of rare and sensitive species of birds, but it would transform the building's airspace into a lethal collision trap to birds. (Id. at 13).

Dr. Smallwood concludes that CEQA review is required to analyze patterns of bird movement through the City and to propose feasible mitigation measures and alternatives to avoid impacts. (Id. at 17).

2. Wind.

The 2022 EIR concluded that the Housing Element would have significant and unmitigated wind impacts. (Addendum 99). The 2022 EIR did not analyze the impacts of the taller buildings allowed in the 2025 Rezone. The 2022 EIR assumed that projects would "stay within existing height limits." (2022 EIR, App. C, p. 17, 3.)

The Addendum admits that the Rezone will have significant unmitigated wind impacts. (Addendum 108). It concluded that buildings over 85-feet tall would have significant wind impacts. (Addendum 104). The Rezone will add taller buildings over 85-feet to more areas of the City, resulting in much greater wind impacts. Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," (CEQA Guidelines 15162(a)(3)(B)), a supplemental EIR is required.

The Rezone allows buildings of up to 650-feet tall in certain areas. It allows increased heights along Market Street between Castro and Van Ness. Up to 160 feet. (Addendum 100). The Rezone allows 85-feet heights along Geary, and up to 300 feet at Geary and Masonic. (Addendum 101). The height difference between the rezoned blocks and the surrounding blocks with low heights would result in wind speeds that would likely exceed the hazard criteria. (Addendum 102).

The 2022 EIR stated, "Wind impacts are generally caused by large building masses that are substantially taller than their surroundings." (2022 EIR, p. 4.7-2.) The 2022 EIR states, "All projects greater than 85 feet In height would require a screening-level assessment conducted by a qualified wind expert in consultation with the department to determine their potential to result in a new wind hazard exceedance or aggravate an existing pedestrian-level wind hazard exceedance defined as the one-hour wind hazard criterion with a 26 mph equivalent wind speed." (2022 EIR, p. 4.7-11.) Since the Rezone will allow much taller buildings, well over 85-feet tall and up to 650-feet tall, it will have significant wind impacts under the standards set forth in the 2022 EIR, and an SEIR is required to analyze and mitigate these impacts.

The Rezone includes a change to the City's wind ordinance that requires CEQA review for buildings over 85 feet. The Rezone proposes to change the hazard criterion such that proposed development must not create any net new exceedance of 26 MPH wind speed for nine hours or more in a year, rather than one hour. (Addendum 104). In other words, after the Rezone, a building may cause hazardous wind conditions for a full workday, which is not currently allowed. The Rezone also eliminates an existing code requirement for "landscaping and/or wind baffling measure shall be installed on the windward side .. of the areas of concern.:" (Addendum 109).

By allowing vastly greater building heights, and eliminating previously existing mitigation standards and mitigation measures, the Rezone will have much greater wind

impacts that were never analyzed in the 2022 EIR. A supplemental EIR is required to analyze these wind impacts because "significant effects previously examined will be substantially more severe than shown in the previous EIR," (CEQA Guidelines section 15162(a)(3)(B)), and "Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative." (CEQA Guidelines section 15162(a)(3)(D)).

3. Shadow.

The vastly taller buildings allowed by the Rezone will have significant shadow impacts exceeding the City's CEQA significance thresholds. The 2022 Housing Element had significant unmitigated shadow impacts on Duboce Park, Larsen Playgrond, and Laurel Hill Playground.(Addendum 110-111). The Rezone creates new significant unmitigated shadow impacts on public parks including but not limited to, Noe Valley Town Square and Helen Wills Park, (Addendum 111, 113, 119) and on other parks and open spaces in areas added by the Rezone to the Northeast District including Washington Square, Joe DiMaggio Playground, and Levi Plazza Park. A supplemental EIR is required to analyze these impacts because "significant effects previously examined will be substantially more severe than shown in the previous EIR," (CEQA Guidelines section 15162(a)(3)(B))

We submit herewith the analysis of shadow expert Adam Noble of the consulting firm FastCast. (Exhibit D). Mr. Noble concludes that the Rezone will result in net new shadow impacts on Joe DiMaggio Playground not analyzed in the 2022 EIR. This is a zero-tolerance park, not allowed to have any additional shadow under CEQA and Measure M (Planning Code Section 295). Mr. Noble's analysis shows that on certain periods of the year and times of day, the Rezone will more than double the amount of shadow on Joe DiMaggio Park.

The City contends that a project that adds new shadow to sidewalks or a publicly accessible open space (whether subject to Section 295 or not) does not necessarily result in a significant impact under CEQA. The shadow impact analysis described in the city's Initial Study CEQA Checklist examines whether a project would "***create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces***".

Under planning code section 295 and the joint Planning Commission/Recreation and Park Commission criterion, the impact of any amount of shadow cast by a project on public parks, open spaces, or recreational facilities under the jurisdiction of SFRPD would be considered "significant" if it would affect a facility with an established quantitative limit.

Joe DiMaggio Playground has an established quantitative limit of zero, and as detailed below, the proposed rezoning would have a net increase in shadow cast on the playground, and would therefore, result in a significant impact.

In assessing impacts per the City's CEQA significance criterion, the environmental review requires evaluation of quantitative and qualitative factors but requires ***use and enjoyment of the park or public space to be substantially and adversely affected for the impact to be "significant."*** Therefore, the City contends that in certain situations, new shadow effects on an open space might not be a significant environmental impact under CEQA but could be found to be significant under planning code section 295. (Housing Element EIR p 4.8-17)[4]

Because Joe DiMaggio playground is heavily used throughout all periods of the day throughout the year by residents from the neighborhood and nearby neighborhoods, as well as schools for P.E. classes, the additional shadow would adversely and substantially impact the use and enjoyment of the park.

As detailed in Mr. Noble's analysis, this would be particularly true for fall periods when shadow impacts would be the most significant and lower temperatures create a greater need for sunlight to be able to enjoy the park.

C. DISPLACEMENT.

The Addendum admits that the Rezone will result in displacement of low-income residents, small businesses, and legacy businesses. (Addendum 37-38). The Addendum states, "new market-rate housing development may contribute to indirect displacement of lower-income communities in San Francisco." (Addendum 37). It continues, "there could be a connection between market rate housing development and displacement." (Addendum 38). By allowing more market rate housing in the Rezone than in the 2022

[4] Commenter disputes the City's shadow impacts methodology because it conflicts with well-established court of appeal precedent. Where a local or regional policy of general applicability, such as an ordinance, is adopted in order to avoid or mitigate environmental effects, a conflict with that policy in itself indicates a potentially significant impact on the environment. (*Pocket Protectors v. Sacramento* (2005) 124 Cal.App.4th 903.) Indeed, any inconsistencies between a proposed project and applicable plans must be discussed in an EIR. (14 CCR § 15125(d); *City of Long Beach v. Los Angeles Unif. School Dist.* (2009) 176 Cal. App. 4th 889, 918*; Friends of the Eel River v. Sonoma County Water* Agency (2003) 108 Cal. App. 4th 859, 874 (EIR inadequate when Lead Agency failed to identify relationship of project to relevant local plans).) A Project's inconsistencies with local plans and policies constitute significant impacts under CEQA. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4; *Georgetown Preservation Society v. County of El Dorado* (2018) 30 Cal.App.5th 358.) Since the Rezone Project has significant impacts under Prop M (Section 295), it also has significant impacts under CEQA. However, because the Rezone Project has significant shadow impacts even under the City's improperly narrow interpretation of the law, the issue is moot.

Housing Element, this displacement impact will be exacerbated. According to an economic analysis prepared by the San Francisco Office of the Controller, as a result of Rezone 500 to 1,000 additional units would be demolished over 20 years. Many of these units will be rent-controlled (pre-1979) units since these properties will have the lowest land value. This is very different than the 2022 Housing Element, which avoided Priority Equity Geographies (PEGs), where lower income residents live. By contrast, the Rezone includes large PEG areas, where displacement is inevitable.

While the Supervisors are considering measures to provide some protection for rent-controlled properties with 3 or more units, this does nothing to protect the thousands of duplex rent-controlled properties found throughout the Richmond and Sunset Districts and elsewhere in the City. Ms. Holley calculates that the Rezone will affect 3,838 2-unit rent-controlled parcels with 7,676 rent-controlled units. Holley states (Exhibit A):

> under the rezoning, there are a significant number of two-unit rent-controlled buildings on parcels with an existing height limit of 40 feet that would be rezoned to allow heights of 50', 65' and 85', and would no longer require setbacks, creating greater incentives and likelihood that they would be redeveloped under the proposed rezoning.

Also, the Rezone allows increased development in North Beach and the Western Addition (Addendum 19), which include high levels of rent-controlled units and Priority Equity Geographies, which were excluded from development in the 2022 Housing Element. San Francisco Planning Code states that "The Priority Equity Geographies SUD is comprised of areas or neighborhoods with a higher density of vulnerable populations" and that the 2022 Update of the Housing Element of the General Plan ((2022 Housing Element) identifies them as "areas…where zoning changes must be tailored to serve the specific needs of the communities that live there; and where programs that stabilize communities and meet community needs need to be prioritized."

The Rezone shifts 5,100 units of housing to the Northeast District, (Addendum 19) which is home to the highest percentage of rent-controlled units in the City. The Rezone adds 939 parcels in PEG areas, with 2,321 units, including 70 two-unit rent-controlled buildings with 140 units.

Urban Planner Deborah Holley states, "The inclusion of parcels in the Priority Equity Geographies SUD and the associated displacement impacts need to be identified and assessed in a supplemental EIR."

Allowing this development and displacement in the Priority Equity Geographies SUD is flatly inconsistent with the 2022 EIR and the 2022 Plan since the stated purpose of the 2022 Plan was to focus development on "well-resourced areas" and away from Priority Equity Geographies. The 2025 Rezone does the exact opposite of the stated goal of the 2022 Plan, which is an obvious inconsistency requiring supplemental CEQA review.

Ms. Holley also points out that the Rezone for the first time adds Laguna Honda Hospital. Redevelopment of this parcel would result in massive displacement. Ms. Holley

states, “The 62-acre Laguna Honda hospital and rehabilitation center located 375 Laguna Honda Boulevard was added to the rezoning plan, and if redeveloped would result in significant displacement impacts for the long-term nursing home residents. Laguna Honda has 769 beds and offers short-term rehab and long-term nursing care…The FEIR did not address the impacts of redevelopment of Laguna Honda with housing because this site was not designated for rezoning. The rezoning program changes the allowable height limit on this site from 40’ which covers the majority of the 62 acres under existing height limits, to 85’ for the entire site, and increases the likelihood that it would be redeveloped with housing.”

Displacement is an environmental issue under CEQA. (*Save Berkeley Neighborhoods v. Regents* (2020) 51 Cal.App.5th 226, 233 (displacement of tenants is a CEQA impact)). CEQA requires the lead agency to determine whether the “environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly,” (PRC § 21083(b)(3), (d)). CEQA Guidelines Appendix G, Section XII provides that a project will have significant impacts where it will:

- Induce substantial population growth or concentration of population in an area, either directly (for example, by proposing new housing or businesses), or indirectly (for example, through extension of roads or other infrastructure);
- Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere; or
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. See CEQA Guidelines Appendix G, Section XII.

The Addendum suggests vague mitigation measures such as “advancing equitable housing access, promoting racial and social equity, and eliminating displacement with strategies such as tenant protections, preservation of affordability, production of affordable housing, and advancing equitable access to housing resources and affordable units.” However, these are vague and unenforceable measures. The Addendum fails to propose any binding and enforceable mitigation measures, such as requiring the mandatory construction of affordable housing, requiring payment for the construction of affordable housing, or requiring public lands to be used for 100% affordable housing. In fact, the city is reversing or weakening all of these requirements. The 2025 Rezone requires absolutely no affordable housing.

A public agency may not rely on mitigation measures of uncertain efficacy or feasibility. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 727.) “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (14 CCR § 15364.) Mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments. (14 CCR § 15126.4(a)(2).) In fact, proposals to provide benefits to legacy businesses, may not be legally allowable, let alone, legally enforceable. (*City of Santa Barbara v. Adamson* (1980) 27 Cal.3d 123, 134.)

The Rezone is reminiscent of the City's "urban renewal" of the Western Addition in the 1960s and 1970s, which wiped out what was at that time one of the most ethnically diverse communities in the United States and displaced much of the City's African-American community. Like the current "Family Zoning Plan," the urban renewal of the Western Addition was justified by the alleged need for more affordable housing. However, to make way for the new housing, the City destroyed a thriving African-American, Latino and Asian-American community, which never fully recovered, and the new housing was occupied largely by wealthier, white residents. The main difference is that the 2025 Family Zoning Plan is now targeting the City's Chinese Community, in the Richmond and Sunset Districts, which will undoubtedly face widescale displacement under the Rezone. This form of "White Urbanism" is now well-documented. (See, e.g,, Goetz, Whiteness and Urban Planning, *Journal of the American Planning Association*, Vol 86 (2020).)

The Federal Reserve Bank has concluded that supply-side constraints such as zoning and environmental regulation have absolutely no impact on housing costs. The single most significant factors driving high housing costs are extreme wealth disparities, and remote work. (Federal Reserve Bank of San Francisco, J. Mondragon, Supply Constraints Do Not Explain House Price and Quantity Growth Across U.S. Cities (2025), https://www.frbsf.org/research-and-insights/publications/working-papers/2025/03/supply-constraints-do-not-explain-house-price-and-quantity-growth-across-u-s-cities/); Federal Reserve Bank, J. Mondragon, Housing Demand and Remote Work (2025), https://www.nber.org/papers/w30041). Building more luxury housing does not decrease housing costs and in fact often leads to gentrification of previously affordable neighborhoods. Trickle-down economics did not work in the Reagan Administration and it will not work now.

Since the Rezone will displace both existing housing and people, it will have a significant impact that must be analyzed in a supplemental EIR. The SEIR must consider mitigation measures and feasible alternatives to reduce this impact.

D. AIR QUALITY AND CANCER RISK.

The Addendum admits that the Rezone will create significant air quality impacts, including additional cancer risk from fine particulate matter, known as PM-2.5. (Addendum 95). The Housing Element EIR admitted significant unmitigated PM-2.5 cancer risk (Addendum 90), but the Rezone will have even greater air quality and cancer risks since it allows more development and taller buildings, and will result in more vehicle miles traveled (VMT). (Addendum 90, 92-93).

The 2022 EIR concluded that buildings under 240-feet and 495 units would have less than significant construction air quality impacts. (Addendum 89). Taller buildings have significant PM-2.5 and nitrogen oxide impacts. (Addendum 94). But allowing taller and larger buildings, the Rezone will create more significant construction air quality impacts, including emissions of cancer-cause PM-2.5. The Rezone will have significant unmitigated cancer risk from PM-2.5 and the Rezone will change the distribution of those risks compared to the Housing Element. (Addendum 95).

The 2022 EIR concluded that even with the implementation of mitigation, air quality impacts would be significant and unmitigated. (2022 EIR, p. S-4, 4.6-56, 4,6-70.) By adding another 4,000 housing units, the 2025 Rezone will have "Significant effects previously examined will be substantially more severe than shown in the previous EIR." (CEQA Guidelines §15164(a)(3)(B).)

Attached hereto are the comments of Dr. Paul Rosenfeld and Matthew Hagemann, P.G., C. Hg., of the environmental consulting firm Soil, Water, Air Protection Enterprise (SWAPE). (Exhibit E). SWAPE notes that the Addendum erroneously states, "The proposed rezoning program and subsequent development is expected to result in the same significant criteria air pollutant impacts from construction but not substantially more severe impacts than those disclosed in the EIR" (Addendum 93). However, SWAPE points out that by adding 4,000 additional residential units, the Rezone vastly exceeds air quality significance threshold set by the Bay Area Air District ("BAAD").

The Bay Area Air District has published screening thresholds to determine whether proposed projects will have significant impacts to air quality. (https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en) Under the official BAAQMD thresholds, construction of 416 apartments is expected to have significant air quality impacts from the construction phase, and 638 apartments are expected to have significant operational air quality impacts. The addition of 4,000 residential units will vastly exceed these significance thresholds, and will therefore have a significant impacts on air quality that must be analyzed under CEQA. (SWAPE at 4).

SWAPE calculates that the additional 4,000 units of housing will create emissions of Reactive Organic Gases (ROGs) of 148 pounds per day (ppd) for the construction phase (far above the CEQA significance threshold of 54 ppd) and 145 ppd of operation ROG emissions (far above the CEQA significance threshold of 54 ppd). (SWAPE at 5). SWAPE concludes, "This finding indicates a potentially significant air quality impact that the Addendum did not identify or address. In our opinion, a subsequent EIR should be conducted to provide a more substantial calculation of the Project's emissions and a more detailed evaluation of the Project's potential air quality impacts." (SWAPE at 5).

When a project exceeds an Air District CEQA significance threshold, as here, this alone establishes substantial evidence that the project will have a significant adverse environmental impact. Indeed, in many instances, such air quality thresholds are the only criteria reviewed and treated as dispositive in evaluating the significance of a project's air quality impacts. (See, e.g. *Schenck v. County of Sonoma* (2011) 198 Cal.App.4th 949, 960 [County applies Air District's "published CEQA quantitative criteria" and "threshold level of cumulative significance"]; see also *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 110-11 ["A 'threshold of significance' for a given environmental effect is simply that level at which the lead agency finds the effects of the project to be significant"].) The California Supreme Court has shown the importance an air district significance threshold has in providing substantial

evidence of a significant adverse impact. (*Communities for a Better Environment v. South Coast Air Quality Management Dist*. (2010) 48 Cal.4th 310, 327 [estimated emissions in excess of air district's significance thresholds "constitute substantial evidence supporting a fair argument for a significant adverse impact"].)

Also, in 2025 city released a new APEZ (air pollutant exposure zone) map showing areas with high cancer risk. The Rezone allows development in some of these newly identified areas. This is a significant new information and a changed circumstance that was not known at the time of the 2022 EIR. (Addendum 95). The new APEZ areas include Sunset Blvd, and Lake Merced. These areas will receive significant development under the Rezone. This impact must be analyzed. (Addendum 96). The Addendum admits that the cancer risks created by the Rezone in the new APEZ areas are significant and unmitigated. (Addendum 97). The Northeast District is within the APEZ area. By moving over 5000 units of new housing to this area, the Rezone exacerbates cancer risks from airborne pollutants.

A supplemental EIR is required because "significant effects previously examined will be substantially more severe than shown in the previous EIR." (CEQA Guidelines section 15162(a)(3)(B).) Also, the new APEZ map constitutes, "new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete." (CEQA Guidelines section 15162(a)(3).)

SWAPE states,

> The Addendum proposes development in the Downtown, Marina, Mission, Northeast, and Western Addition planning districts, which have areas within the City's air pollutant exposure zones ("APEZ"). The Addendum states that "the proposed rezoning program may result in a small proportion of additional rezoned parcels being in the APEZ, which could increase the number of people exposed to the generally high pollutant concentrations in the APEZ" (p. 97).
>
> In 2025, the City identified new APEZ areas, defined as locations "where particulate matter (PM2.5) is greater than or equal to 9 µg/m3 or where the risk of cancer from air pollutants is greater than or equal to 100 in a million." (SWAPE at 5).

The Addendum concludes that this impact is "significant and unavoidable." (Addendum 97). SWAPE disagrees with this conclusion and proposes numerous feasible mitigation measures to reduce air pollution impacts that should be analyzed in a supplemental EIR. (SWAPE at 7-9). Among the mitigation measures suggested by SWAPE are requiring the use of ultra-low VOC paints, advanced air filtration units, emissions controls on backup generators, and many other measures. These mitigation measures should all be analyzed and imposed through a supplemental EIR process.

E. TRANSIT DELAY.

The Addendum admits that the Rezone will create significant impacts related to public transit delay, particularly along the busy 19th Avenue corridor, and on the 38-Geary and 19-Polk lines. (Addendum 71, 78, 84). The Addendum concludes that Rezone would contribute considerably to significant and unavoidable bus loading impacts. (Addendum 84). These impacts, particularly along the 19th Avenue corridor, will be exacerbated by the recent closure of the Great Highway, which has caused congestion on 19th Avenue by closing a major thoroughfare in the Western side of the City. The closure of the Great Highway is a changed circumstance that was unknown at the time of the 2022 EIR.

A supplemental EIR is required because "substantial changes [have] occur[ed] with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." (CEQA Guidelines §15162(a)(2).) The closure of the Great Highway is clearly a significant changed circumstance that was not analyzed in the 2022 EIR and that will impact the Transportation analysis for the Rezone.

F. PUBLIC SERVICES.

The Rezone will allow residential development on the site of the North Point Wet Weather Sewage Treatment Facility. This site was not slated for development in the 2022 Plan. This amendment will require either a replacement facility or vast amounts of infrastructure to transport sewage to other plants. The sewage currently treated by the North Point Plant must go somewhere. Urban Planner Deborah Holley states, "This City-owned and -operated sewage treatment plant is one of three facilities in San Francisco that treats wastewater. It is only active during wet weather and treats up to 150 million gallons a day (MGD) during rainstorms, or 26 percent of the wastewater treated on a rainy day." She continues, "The FEIR did not address the impacts of redevelopment of this treatment plant with housing because this site was not designated for rezoning. The rezoning program changes the allowable height limit on this site from 40' to 85' and increases the likelihood that it would be redeveloped with housing. The site is in the P (Public) District where residential uses in 100 percent Affordable Housing Projects and Educator Housing Projects are permitted, and other residential uses are conditional. There is no reason the City would include this site in the rezoning program other than the fact that the City believes rezoning this site will increase the likelihood of housing development at this location. Since it is inconceivable that a developer would build housing on top of a sewage treatment plant, the City needs to analyze the impacts associated with elimination of the sewage treatment plant." Ms. Holley states:

> Elimination of the sewage treatment plant would result in reduced sewage treatment capacity during wet weather. This would require (a) the construction of a new sewage treatment facility in this area of the city, or (b) the construction of new infrastructure to convey wastewater from the northeast quadrant of the city to the Oceanside Treatment Plant or the Southeast Treatment Plant in Bayview/Hunters

Point and expansion of one of these facilities to expand the treatment capacity by 150 MGD to compensate for the loss of the North Point facility.

The potential public health and hazardous materials impacts of redeveloping the site with housing must be identified and analyzed and mitigation measures must be identified in a supplemental EIR. This includes but would not be limited to testing and classification of contaminants, calculations of health risk, specific remediation measures, associated secondary impacts due to the excavation of contaminated soil, transportation and disposal of infrastructure, and treatment and disposal of contaminated water and soil.

CEQA does not allow the City to defer analysis of obvious sewage treatment needs. When a project will require construction of additional sewage treatment infrastructure, the CEQA document must analyze and mitigate the impacts of that necessary new construction. (*Sundstrom v. Cnty. of Mendocino* (1988) 202 Cal. App. 3d 296; *San Joaquin Raptor/Wildlife Rescue Ctr. v. Cnty. of Stanislaus* (1994) 27 Cal. App. 4th 713 (EIR was also inadequate with respect to project description by its lack of reference to wastewater treatment plant which was necessary element of project).)

V. GENERAL PLAN ANALYSIS.

The Rezone is legally prohibited because it is inconsistent with the General Plan. "The Legislature has mandated that every county and city must adopt a 'comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning.'" (*Citizens of Goleta Valley v. Bd. of Sups*. (1990) 52 Cal.3d 553, 570 (quoting Gov. Code §65300).) The Supreme Court has described the general plan as "the constitution for all future developments within the city or county." *Id*. (internal quotation marks omitted). The "propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." (*Id. DeVita v. Cty. of Napa*, 9 Cal. 4th 763, 803 (1995).) The "propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." (*Citizens of Goleta Valley v. Bd. of Sups.* (1990) 52 C.3d 553, 570.)

The Rezone is flatly inconsistent with the adopted General Plan, and its adopted Housing Element. The Rezone allows development in historic districts, such as North Beach and Telegraph Hill, which were protected from development in the General Plan. The Rezone allows development in Priority Equity Geographies that were protected from development in the General Plan. The Rezone allows building heights and density throughout the City that vastly exceed limits set forth in the General Plan. As such, the Rezone is legally prohibited unless and until the City amends its General Plan.

In addition, each of these General Plan inconsistencies is a significant impact that must be analyzed in an EIR. Any inconsistencies between a proposed project and applicable plans must be discussed in an EIR. (14 CCR § 15125(d); *City of Long Beach v. Los Angeles Unif. School Dist*. (2009) 176 Cal. App. 4th 889, 918; *Friends of the Eel*

River v. Sonoma County Water Agency (2003) 108 Cal. App. 4th 859, 874 (EIR inadequate when Lead Agency failed to identify relationship of project to relevant local plans).) A Project's inconsistencies with local plans and policies constitute significant impacts under CEQA. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4.)

VI. CONCLUSION.

For the foregoing reasons, we respectfully request that the Planning Commission direct the Planning Staff to prepare a Supplement EIR to analyze the Rezone and to consider feasible mitigation measures and alternatives to reduce its significant environmental impacts that were not analyzed in the 2022 EIR for the Housing Element. We further request that the Planning Commission conclude that the Rezone is prohibited since it is inconsistent with the City's General Plan.

Sincerely,

Richard Toshiyuki Drury
LOZEAU DRURY LLP

EXHIBIT A

December 1, 2025

Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

RE: Adequacy of the San Francisco Housing Element 2022 Update FEIR Addendum

Dear Mr. Drury,

The San Francisco Planning Department published an Addendum to the Final Environmental Impact Report for the 2022 Housing Element ("Housing Element FEIR") on September 3, 2025, stating that no supplemental or subsequent environmental review was required for the Family Housing Rezoning Program ("proposed rezoning program, Family Zoning Plan, FZP, rezoning plan").

Because there are potential new or more severe environmental impacts that would result from the proposed rezoning program that were not identified and analyzed in the Housing Element FEIR, a supplemental EIR should have been prepared instead of an Addendum.

Such impacts include, but are not limited to the following:

A. The rezoning plan would result in new impacts associated with the potential redevelopment of the North Point Wet Weather Sewage Treatment Facility which was not included and therefore not analyzed in the Housing Element FEIR but which, as a result of the rezoning plan, is now designated as a site for the development of housing.

B. The rezoning plan would result in more severe displacement impacts, particularly those associated with the addition of numerous parcels within the Priority Equity Geographies SUD that were added to the rezoning plan but not included, and therefore not analyzed, in the Housing Element FEIR.

My qualifications for preparing this analysis include over 25 years of professional experience in land use and environmental planning, including the management and preparation of CEQA documents, and a Master of Science degree in Urban Planning

from Columbia University. My resume can be accessed via this link: https://www.holleyconsulting.com/resume/.

The Addendum to the Housing Element FEIR maintains that no supplemental or subsequent environmental review is required for the proposed rezoning program because the environmental impacts were adequately identified and analyzed in the Housing Element FEIR, and the rezoning program "…would not result in any new or more severe environmental impacts than were identified previously."

Specifically, the Addendum states that "…no additional environmental review is required under CEQA Section 21166 and CEQA Guideline Sections 15162-15164 for the following reasons:

(1) the Family Housing Rezoning Program would not involve new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Housing Element EIR;
(2) no substantial changes have occurred that would require major revisions to the Final EIR due to the involvement of new environmental effects or a substantial increase in the severity of effects identified in the Housing Element EIR; and
(3) no new information of substantial importance has become available which would indicate that (i) the Family Housing Rezoning Program will have significant effects not discussed in the Final EIR; (ii) significant environmental effects will be substantially more severe; (iii) mitigation measure or alternatives found not feasible that would reduce one or more significant effects have become feasible, or (iv) mitigation measures or alternatives that are considerably different from those in the Housing Element EIR would substantially reduce one or more significant effects on the environment."

2022 FEIR compared to Proposed Rezoning

Baseline Map. In order to understand what was analyzed in the 2022 FEIR, and what was added in subsequent policy changes, I reconstructed "Figure 2-7 Projected Heights and Density Controls Under the Proposed Action" from page 2-25 of Vol. 1 of the FEIR. ***Figure 1***, below, provides the most detailed description of the parcel-level impacts of the proposed rezoning for parcels analyzed in the 2022 Final EIR.

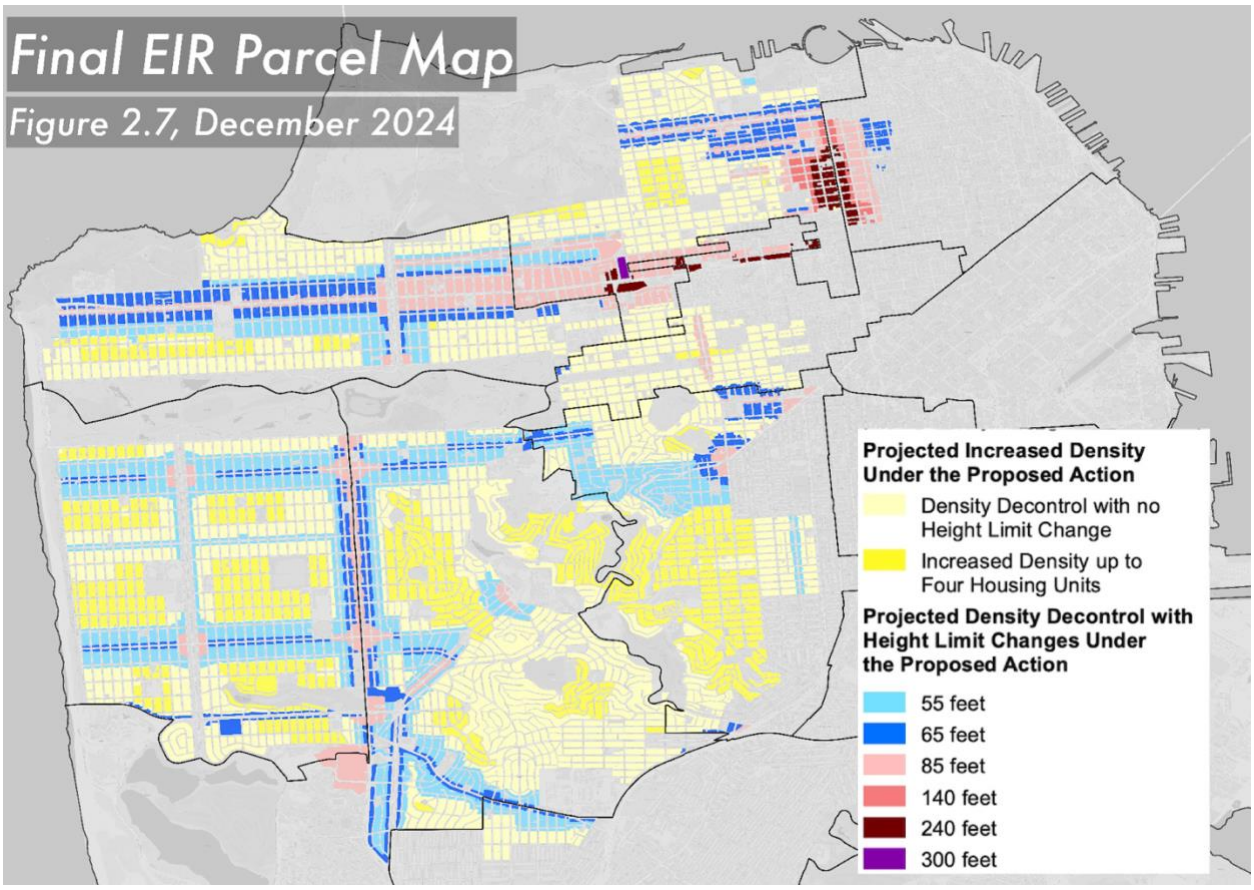

Figure 1. Baseline Map: 2022 FER Map Compared to the September 2025 Map, plus removing 3-unit+ Rent-Controlled Buildings and Hotels

The September 2025 map, based on the rezoning legislation introduced in board file 250700, was the most recent parcel-level map released by the Planning Department. The most significant amendments passed include exempting rent-controlled buildings of three units or larger from the local program, and exempting hotel parcels. *Planning recently released a November 17th map but it is not accurate as it does not yet exclude three-units+ rent controlled buildings.*

Figure 2 below shows that 6,938 new parcels were added in the proposed rezoning plan, 7,580 parcels have increased heights, and 16,135 parcels allow for greater densities. Associated unit counts were also estimated and are provided in the table following Figure 2.

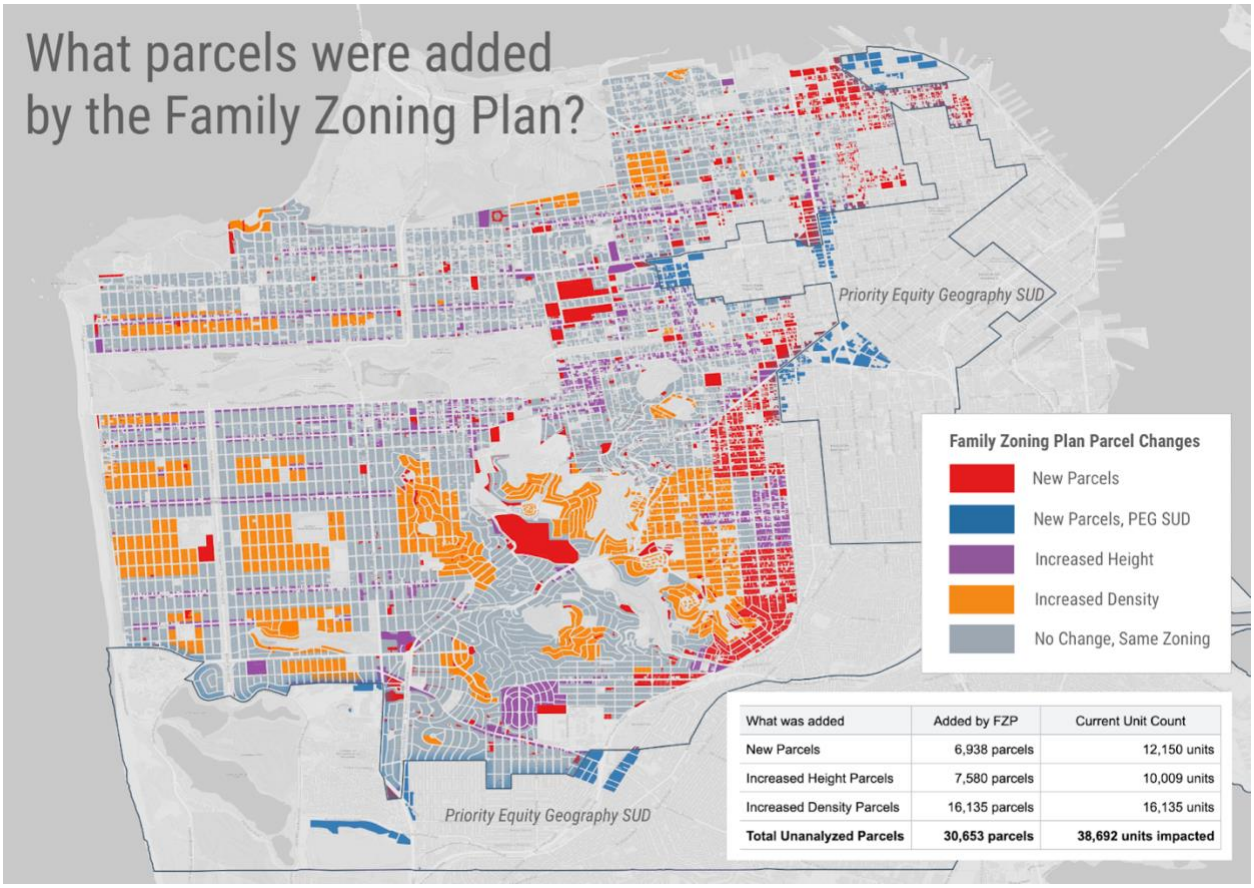

Figure 2. Parcels added and parcels with increased heights and densities under the rezoning

1. What was added to the Family Zoning Plan from the FEIR?

What was added	Added by FZP	Current Unit Count
New Parcels	6,938 parcels	12,150 units
Increased Height Parcels	7,580 parcels	10,009 units
Increased Density Parcels	16,135 parcels	16,135 units
Total Unanalyzed Parcels	**30,653 parcels**	**38,692 units impacted**

2) Scope of Family Zoning Plan vs. 2022 Final EIR

Total Count	Final EIR - 2022	Family Zoning Plan - 2025
Parcel Count	82,834	79,932
Current Units Count*	150,031	94,281
Area Added (sq ft)	257,461,954	254,211,574

** Residential and non-residential "units" (commercial spaces) impacted*

3. Existing Parcels with increased height limits

a. **7,580 parcels** with increased height limits
b. **10,009 currently existing units** in parcels with increased height limits
c. **31,424,690 sq ft** of total lot area in parcels with increased height limits

Height Limit Increase	Parcels	Current Unit Count
100' +	73	201
60' - 100'	34	31
40' - 60'	667	823
20' - 40'	3,244	4,906
< 20'	3,562	4,048

The following discussion describes potential impacts that were not analyzed in the CEQA document for the rezoning project. The Addendum is inadequate under CEQA and a supplemental EIR must be prepared to identify and analyze the potentially new and more severe impacts described below.

A. Rezoning of the North Point Wet Weather Sewage Treatment Facility

There are new potentially significant impacts associated with the proposed rezoning plan that were not identified and assessed in the Housing Element EIR or Addendum including impacts associated with development of the North Point Wet Weather Facility located at Bay Street and the Embarcadero. This City-owned and -operated sewage treatment plant is one of three facilities in San Francisco that treats wastewater. It is only active during wet weather and treats up to 150 million gallons a day (MGD) during rainstorms, or 26 percent of the wastewater treated on a rainy day.

The 2022 FEIR did not address the impacts of redevelopment of this treatment plant with housing because this site was not designated for rezoning at that time. The rezoning program changes the allowable height limit on this site from 40' to 85' and increases the likelihood that it would be redeveloped with housing. The site is in the P (Public) District where residential uses in 100 percent Affordable Housing Projects and Educator Housing Projects are permitted, and other residential uses are conditional.

There is no reason the City would include this site in the rezoning program other than the fact that the City believes rezoning this site will increase the likelihood of housing development at this location. Since it is inconceivable that a developer would build housing on top of a sewage treatment plant, the City needs to analyze the impacts associated with elimination of the sewage treatment plant.

Moreover, although the Addendum states that "It is likely that the Oceanside Water Pollution Control Plant would experience reduced pollutant loads under the proposed rezoning program compared to the adopted housing element because housing growth distribution under the proposed rezoning program would be more evenly distributed in the western and northern parts of the city and along transit corridors, instead of heavily concentrated in the Inner Sunset, Outer Sunset, and Richmond planning districts as assumed under the adopted housing element; thus pollutant load generation, would be more evenly distributed throughout the city rather than concentrated in the western portion of the city," there is no mention at all of the North Point treatment plant. (See pages 127-128 of the Addendum.)

Potentially significant impacts that should have been identified and analyzed in a supplemental EIR include, but are not limited to the following:

1. Elimination of the sewage treatment plant would result in reduced sewage treatment capacity during wet weather. This would require (a) the construction of a new sewage treatment facility in this area of the city, or (b) the construction of new infrastructure to convey wastewater from the northeast quadrant of the city to the Oceanside Treatment Plant or the Southeast Treatment Plant in Bayview/Hunters Point and expansion of one of these facilities to expand the treatment capacity by 150 MGD to compensate for the loss of the North Point facility.

2. The potential public health and hazardous materials impacts of redeveloping the site with housing must be identified and analyzed and mitigation measures must be identified in a supplemental EIR. This includes but would not be limited to

testing and classification of contaminants, calculations of health risk, specific remediation measures, associated secondary impacts due to the excavation of contaminated soil, transportation and disposal of infrastructure, and treatment and disposal of contaminated water and soil.

B. More severe displacement Impacts would result from the proposed rezoning program than were assumed in the Housing Element FEIR

Potentially significant displacement impacts that should have been identified and analyzed in a supplemental EIR include, but are not limited to the following:

1. ***Rezoning and displacement of tenants in two-unit rent-controlled buildings***. As shown below, under the proposed rezoning, there are a significant number of two-unit rent-controlled buildings on parcels with an existing height limit of 40 feet that would be rezoned to allow heights of 50', 65' and 85', and would no longer require setbacks, creating greater incentives and likelihood that they would be redeveloped under the proposed rezoning. In other words, it is reasonably foreseeable that they would be redeveloped and therefore should have been considered in the CEQA review for the project.

Rent Controlled Parcels

What was added	Parcels affected	Existing units affected
New Parcels	1,237 parcels	2,474 units
Increased Height Parcels	1,818 parcels	3,636 units
Increased Density Parcels	783 parcels	1,566 units
Total Rent Controlled Parcels	3,838 parcels	7,676 units

It is widely accepted that tenants of two-unit rent-controlled buildings already have fewer protections than tenants who live in buildings with three or more units because a two-unit building can more easily be converted into condos. In two-unit buildings, all an owner needs to do is move in, and they can evict a tenant to do so.

The inclusion of parcels with two-unit rent controlled buildings in the rezoning plan and the associated displacement impacts need to be identified and assessed in a supplemental EIR.

2. ***Rezoning and displacement in the Priority Equity Geographies Special Use District.*** Section 249.97 (b) of the San Francisco Planning Code states that "The Priority Equity Geographies SUD is comprised of areas or neighborhoods with a higher density of vulnerable populations" and that the 2022 Update of the Housing Element of the General Plan ((2022 Housing Element) identifies them as "***areas***…***where zoning changes must be tailored to serve the specific needs of the communities that live there; and where programs that stabilize communities and meet community needs need to be prioritized***."

   As shown in ***Figure 2*** above and quantified below, close to 1,000 parcels in the proposed rezoning program that were not analyzed in the Housing Element FEIR are located within the PEG SUD. Displacement impacts for residents in these areas are more severe than for residents outside of the SUD.

   New Priority Equity Geography Parcels
   a. 939 parcels
   b. 2,321 current existing units (including RC and non-RC)
   c. 70 two-unit RC buildings, 140 units

   The inclusion of parcels in the Priority Equity Geographies SUD and the associated displacement impacts need to be identified and assessed in a supplemental EIR.

3. ***Rezoning and displacement of Laguna Hospital and Rehabilitation Center occupants***. As shown in ***Figure, 2*** above, the 62-acre Laguna Honda hospital and rehabilitation center located 375 Laguna Honda Boulevard was added to the rezoning plan, and if redeveloped would result in significant displacement impacts for the long-term nursing home residents.

   Laguna Honda has 769 beds and offers short-term rehab and long-term nursing care. in the Forest Hill neighborhood of San Francisco.

   The FEIR did not address the impacts of redevelopment of Laguna Honda with housing because this site was not designated for rezoning. The rezoning program changes the allowable height limit on this site from 40' which covers the majority of the 62 acres under existing height limits, to 85' for the entire site, and increases the likelihood that it would be redeveloped with housing. The site is in the P (Public) District where residential uses in 100 percent Affordable Housing Projects and Educator Housing Projects are permitted, and other residential uses are conditional.

There is no reason the City would include this site in the rezoning program other than the fact that the City believes rezoning this site will increase the likelihood of housing development there.

Because the impacts of redevelopment of Laguna Honda Hospital and Rehabilitation Center was not analyzed in the Housing Element FEIR, a supplemental EIR is needed to determine the impacts and required mitigation measures.

EXHIBIT B

November 30, 2025

Mr. Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

RE: Family Zoning Plan (Rezone) – Impacts on Historic Resources

Dear Mr. Drury,

This letter sets forth my professional opinion concerning the impacts on historic resources from the proposed San Francisco Rezoning Plan ("Rezone"), also known as the "Family Zoning Plan."

As a professional with 32 years of experience in historic preservation and with the California Environmental Quality Act (CEQA), I meet the Secretary of the Interior's Professional Qualification Standards in History and Architectural History. I also have the following credentials: received a Master of Arts Degree in Architectural History from the University of Virginia's School of Architecture; previously served as president of the San Francisco Landmarks Advisory Board (appointed by Mayor Newsom); since 2012 have continuously been on the City of San Francisco Planning Department's approved consultant pool for historic resources consultants; and certified by the San Francsico Contract Monitoring Division (CMD) as a woman-owned Local Business Enterprise (LBE). I have written innumerable historic resource and historic district designation and evaluation reports throughout the course of my career.

While the City of San Francisco (City) prepared and certified an Environmental Impact Report (EIR) for its 2022 Housing Element, the proposed Rezone is vastly different from the rezoning scenarios studied in the 2022 EIR. Nevertheless, the Planning Department proposes to rely on an Addendum (September 3, 2022) to the previously certified EIR. A rezoning of this magnitude requires thorough environmental review under CEQA so that the City's residents and decision-makers can be aware of its impacts, can consider all feasible mitigation measures and alternatives, and can have a robust and open discussion prior to making irreversible changes to San Francisco's landscape for all time.

The Rezone would result in a myriad of significant new impacts that were not analyzed in the 2022 EIR or included in the Housing Element, not the least of which are impacts to historic resources. The Rezone would result in significant impacts to historic resources that have not yet been analyzed. The 2022 EIR found significant and unmitigated impacts to historic resources, but the Rezone's impacts are far greater and substantially more severe than shown in the previous EIR, with significant and unmitigated impacts. Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).)

As set forth in the Attachments to this letter, the Rezone would allow the demolition and redevelopment on, near, or within areas containing historic resources. Many known and designated, either locally under Article 10 of the Planning Code, or through state or federal historic designation programs, are within areas that were not included for rezoning in the 2022 Housing Element or analyzed in the 2022 EIR, while others were included in the analysis, but have since been upzoned or changed to form based density or have significantly higher heights on or around them by the Upzone. None of the potentially significant impacts that could result from redevelopment of these historic resources were analyzed in the 2022 EIR. See the following attachments for further analysis: Attachment 1 - Historic Resource Impact Analysis of Rezone and Attachment 2 - North Beach National Register of Historic Places Historic District Parcel Analysis.

Since this new information provided in the Attachments constitute significant and substantially more severe effects not discussed in the 2022 EIR, a Supplemental EIR is required to analyze and mitigate these impacts. The newly identified impacts are beyond the scope of the 2022 EIR. The Addendum barely mentions additional historic resources impacts and fails to analyze impacts of the drastically additional height and density increases as they relate to known historic resources. Further, the Addendum fails to analyze changes in zoning use districts on designated historic resources or historic districts or areas with known concentrations of "A" rated historic resources, which are identified, but not yet designated resources.

Further, the Rezone now includes the following language related to Bonuses for "Historic Preservation." However, these bonuses, as shown below, encourage height increases, facadism, and other over-scaled additions that would result in diminished historic fabric and result in unintended impacts to historic resources. Additionally, this proposed legislation, added in the September 11, 2025 version of the legislation, has not been evaluated for its potentially significant impacts on historic resources.

The following language has been added to Section 206.10(e) of the Rezone legislation providing additional height and square footage bonuses for the "preservation" of Historic Building.

> *(e)* ***Additional Height, Square Footage, and Other Bonuses.*** *HC-SF Projects that contain certain uses, amenities, or other building features are eligible for additional bonuses and code modifications, as described below.*
>
> *********

(6) ***Preservation of Historic Buildings.*** *In districts other than Residential districts, projects proposing an alteration to a Historic Building and/or constructing new buildings on sites that contain a Historic Building shall be permitted to include additional square footage, as provided below:*

(A) up to 1.5 times the gross floor area foregone by retaining the Historic Building and complying with Objective Standards pertaining to Historic Buildings, including through setting back building additions and/or new construction in relation to the Historic Building. For the purposes of this subsection (e)(56)(A), the foregone gross floor area shall be equal to the gross floor area within the volume that would otherwise be permitted under the Planning Code and all applicable Objective Standards, inclusive of modifications allowed pursuant to this Section 206.10, but is not being constructed in order to accommodate a reduced building mass above or around a Historic Building and that complies with or exceeds the setbacks or mass reductions required by the Objective Standards pertaining to Historic Buildings. The Zoning Administrator may publish further guidance on the calculation of foregone gross floor area; and

(B) for Historic Buildings with storefronts that contain character-defining features, an additional 0.25 square feet for every square foot of space in the storefront, provided that the project preserves the storefront in compliance with Objective Standards pertaining to Historic Buildings; and

(C) *horizontal or vertical additions to accommodate this extra square footage, except that any such additions shall not:*

(i) exceed 20 feet above the Housing Choice-SF height limit (Section 263.19); or

(ii) reduce the required rear yard above the ground floor to less than 15 feet where the site abuts the rear yard of adjacent parcels containing residential uses.

(D*) The Historic Building* and/or historic storefront *shall be maintained in compliance with the Preservation Design Standards for the life of the project, and the requirement shall be recorded in a Notice of Special Restrictions.*

This late addition of the above language to the legislation has the great potential to cause impacts to historic resources, instead of preserving them, as it would allow large sections of historic buildings to be demolished and over scaled additions and height increases to be implemented as bonuses.

For the reasons listed above, and as set forth in the Attachments, it is my professional opinion that the Rezone, if approved, would have additional and substantially more severe impacts to historic resources than were analyzed in the certified EIR. These potentially significant environmental impacts must be analyzed and mitigated under the California Environmental Quality Act ("CEQA") through a full recirculated Supplemental EIR.

Sincerely,

Bridget Maley
Principal

Attachment 1: Historic Resource Impact Analysis of Rezone
Attachment 2: North Beach National Register of Historic Places Historic District Parcel Analysis

a+h 1715 green street san francisco, ca 94123 *phone*: 415.760.4318 bridget@architecture-history.com
www.architecture-history.com

Attachment 1: Historic Resource Impact Analysis of Family Zoning Plan (Rezone)
November 30, 2025
Compiled by Bridget Maley, architecture + history, llc

The Family Zoning Plan (Rezone) would result in significant new impacts on historic resources that were not included in the 2022 Housing Element or analyzed in its associated Environmental Impact Report (2022 EIR). The area of the Rezone is significantly larger than the area included in the 2022 Housing Element and analyzed in the 2022 EIR.

It should be noted that all projects using the Rezone would be subject to form-based density (i.e. density decontrol) regardless of height limit or underlying zoning district. These height and density changes would encourage demolition of smaller-scale historic resources throughout the Rezone area.

In addition, for many parcels within the Rezone area, increases to the existing base height limits and/or changes from density limited to form based density (i.e. density decontrol) would be allowed for projects NOT using the Rezone, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses.

The Housing Element EIR Addendum No. 1 (September 3, 2025) fails to analyze impacts of additional height and density increases described above, as well as changes in zoning use districts, on designated historic resources and historic districts or on areas with known concentrations of "A" rated historic resources, but not yet designated as historic districts, including, but not limited to those resources listed below.

The list below includes landmarks and contributors to historic districts designated pursuant to Article 10 of the San Francisco Planning Code that may be removed from the Upzone by a pending amendment to the Upzone legislation.

Historic Resources Not Evaluated in 2022 Housing Element EIR

The following districts and individual historic resources were not included in the 2022 Housing Element or analyzed in the 2022 EIR, but are now included in the Rezone as of November 2025.

- Fully documented North Beach National Register Historic District submitted to the State Historic Preservation Office and awaiting hearing by the State Historical Resource Commission was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone could have significant impacts to this identified historic district, including heights rezoned from 40 feet to 50 feet in block Block 0076. (See Attachment 2: List of Historic Resources in North Beach Historic District in Rezone.)

- Designated Northeast Waterfront Article 10 Historic District. Sansome Street Area Revision contained in "Appendix D: Memorandum Regarding Potential Zoning Map Changes in Supervisor District 3" disclosed the intent to include in the Rezone Plan areas within this Historic District centered along Sansome Street include the following seventeen parcels: Block 0085/Lots 005 and 048; Block 0106/Lots 001, 002, 003, 004, and 042; Block 0112/Lots 008 and 009; Block 0113/Lots 006, 041, 040, and 063; Block 0134/Lot 001; and Block 0135/Lots 007, 008, and 009. This area was not included in the

2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Eligible Washington Square Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone now includes six parcels on Filbert Street between Powell Street and Stockton Street, including the Church of Saints Peter and Paul and the Priests' Residence, which could result in significant impacts to this Historic District.

- Eligible Upper Grant Avenue Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone now includes seven contributory buildings in this District along Filbert Street, Medau Place, and Grant Avenue (Blk 0088/Lots 5, 41-57, and 9), which could result in significant impacts to this Historic District.

- Designated Otis Elevator Company National Register No. 99001265 (1 Beach Street; Parcel 0018/001). This parcel is rezoned from its existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Grabhorn Press Building National Register No. 97000349 (1335 Sutter Street; Parcel 0690/012A). This parcel was rezoned from its existing height limit of 130 feet to to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses.This drastic upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Thomas Payne House National Register No. 80000847 (1409 Sutter Street; Parcel 0689/025). This parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses. This drastic upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Myrtle Street Flats Building, both National Register No. 76000520 and Article 10 Landmark No. 71 (234-248 Myrtle Street; Parcel 0714/020), sometimes referred to as part of the Goodman Building. This parcel is rezoned from its existing height limit of 130 feet to 650 feet. The Rezone also increases the base height limit from 130 feet to 260 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses.This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Washington Square Article 10 Landmark No. 226 (1651 Stockton Street and Filbert Street; 0102/022001). The parcels on the northern edge of Washington Square are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this park.

- Designated Article 10 "Structure of Merit" The Cannery (600 Beach Street; Parcel 0010/001). This parcel is rezoned from its existing height limit of 40 feet to 65 feet. As the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this site.

- Designated Building at 1840-1842 Eddy Street National Register No. 73000437 (1840-1842 Eddy Street, Parcel 1127/015). This parcel is rezoned from its existing height limit of 65 feet to 85 feet and changed to form-based density (density decontrol). This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Building at 45-57 Beideman Place National Register No. 73000436 (45-57 Beideman Place, Parcel 1100/118). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Building at 33-35 Beideman Place National Register No. 73000435 (33-35 Beideman Place, Parcel 1100/095). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1331-1335 Scott Street National Register No. 73000440 (1331-35 Scott Street, Parcel 1100/120). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1321 Scott Street National Register No. 7300439 (1321 Scott Street, Parcel 1100/049). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1249-1251 Scott Street National Register No. 73000442 (1249-51 Scott Street, Parcel 1127/035). This parcel now included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1239-1245 Scott Street National Register No. 7300441 (1239-45 Scott Street, Parcel 1127/043). This parcel now included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Temple Sherith Israel National Register #10000114 (2266 California St., Parcel 0637/011). Now included in the Rezone, this parcel is being upzoned from its existing 40 feet to 85 feet with a new base height of 50 feet. It is also changed to form based density and rezoned to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Dallam-Merritt House National Register #84001185 (2355 Washington Street, Parcel 0613/021). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated site of Third Baptist Church California Registered Historical Landmark No. 1010 (483 Greenwich Street, Parcel 0087047). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Fillmore-Pine Building National Landmark No. 82002247 (1940-1946 Fillmore Street, Parcel 0660/023). Now in the Rezone, this parcel is being rezoned from its existing height limit of 40 feet to 65 feet. This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Park View Hotel National Register No. 83001235 (750 Stanyan Street, Parcel 1250/025). Now in the Rezone, this parcel is being rezoned from its existing height limit of 50 feet to 65 feet. This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Delane House National Register No. 82000984 (70 Buena Vista Terrace, Parcel 2608/013). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 584 Page Street National Register No. 85002195 (584 Page Street, Parcel 0842/017). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Moss Beach House National Register No. 83001232 (1626 Great Highway, Parcel 1895/038). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Real Estate Associates (TREA) Houses National Register No. 85000705 (2503, 2524, 2530 and 2536 Clay Street (Parcel 0630/032, 0611/008, 0611/009 and 0611/010). Now in the Rezone, the house at 2503 Clay is upzoned from 40 feet to 65 feet. These 4 historic houses were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Wilford Houses National Register No.85001914 (2121 & 2127 Vallejo Street, Parcels 0565/021and 0565/022). Now in the Rezone, these parcels adjoin parcels upzoned to 65 feet. These 2 historic houses were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Sinton House National Register No. 11000944(1020 Francisco Street, Parcel 0476002C).Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Russian Hill Paris Block Architectural Historic District National Register of Historic Places Historic District No. 87002288. The Rezone includes four parcels in this District between Green Street and Macondray Lane (Block 0121/Lots 005, 006, 049, and 056), which were not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this Historic District.

- Designated Russian Hill Macondray Lane National Register Historic District No. 87002286. The Rezone includes this entire Historic District, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this Historic District, especially corner parcels that could be up to 65 feet in height in this residential district.

- Designated Port of San Francisco Embarcadero National Register Historic District No. 06000372. The Rezone includes increased height and density along the Embarcadero, especially on Bay, North Point, Beach and Jefferson Streets, which could impact this Historic District. These heights, not included in the 2022 Housing Element or analyzed in the 2022 EIR, could result in significant impacts to this Historic District.

- Designated Golden Gate Park National Register Historic District No. 04001137. The Rezone includes height increases along Fulton Street and Lincoln Boulevard bordering the north and south sides of Golden Gate Park and Stanyon Street bordering the east side. The heights along Fulton Street are increased from 40 feet to 85 feet and along

Lincoln from 40 feet to 65 feet, both streets are changed to form-based density (density decontrol) and rezoned to RTO-C that allows commercial uses on the ground floors. Heights along a portion of Stanyan Street are rezoned from 50 feet to 65 feet. Heights are also increased in places along Fell and Oak Streets in the Panhandle of the Park. These proposed height, density, and use changes in the Rezone were not included in the 2022 Housing Element or analyzed in the 2022 EIR and would have significant impacts on this designated historic district.

- Designated Presidio of San Francisco National Historic Landmark Historic District No. 66000232. Development proposed in the Rezone adjacent to the Presidio of San Francisco at 300 Lake Street; Parcel No. 1354/001, upzoned from 40 feet to 65 and from 65 feet to 85 feet. Also upzoned at the Lombard Gate from 40 feet to 65 feet. Additionally, development in the residential zoned areas of Presidio Terrace and Sea Cliff heights would be allowed to 65 feet on 8,000 square foot parcels. These Rezone heights were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Lower Nob Hill Apartment Hotel National Register Historic District No. 91000957. Height increases along the edges would impact this designated Historic District. The increased heights at Bush and Leavenworth Streets from the existing height limit of 65 feet to 120 feet and Polk Street between Geary and Sutter Streets from the existing height limit of 80 feet to 240 feet. These heights were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could impact this Historic District.

- Designated Veterans Affairs Medical Center National Register Historic District No. 05001112 (4150 Clement Street). Along the southern edge of this District the Rezone includes increases from the existing height limit of 40 feet to 65 feet on Clement Street. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could impact this Historic District.

- Designated Cable Car National Register Historic District No. 66000233. The Cable Car lines located within areas being upzoned and/or density decontrolled by the Upzone Plan could be significantly impacted. These include, without limitation, those lines along the following routes: Hyde between Beach and Washington, Washington between Hyde and Mason, Jackson between Leavenworth and Hyde, California between Van Ness and Mason, Mason between Green and Columbus, Columbus between Mason and Taylor, and Taylor between Chestnut and Francisco. Height increases adjacent to these streets could impact these linear transit historic resources, and construction activities resulting from development incentivized by the Upzone could cause extensive service interruptions. Impacts to the Cable Car National Register Historic District were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Geneva Office Building and Power House (S.F. & San Mateo Railroad Co.Office Building), both National Register No. 10000111 and Article 10 Landmark No. 180 (500 Geneva; Parcel 6972/036). The Rezone Plan upzones this publicly owned site from the existing height of 40 feet to 85 feet and includes it in the Non-Contiguous SFMTA Special Use District, which allows the site to be developed for mixed use residential development. The Rezone Plan also increases the base height limit from 40

feet to 50 feet and changes the density to form-based, which would allow development using the State Density Bonus or other State programs that provide density or development bonuses. New development on and adjacent to this historic site could result in significant impacts. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Eligible Hayes Valley Residential Historic District, an eligible California Register Historic District. The current Rezone includes a significant portion of the District. This area of Hayes Valley was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Eligible Northpoint Sewage Treatment Plant Historic District, an eligible National Register and California Historic District. The District includes 101 North Point (Parcel 0033/005), 66 Bay Street (0034/002) and 160 Bay Street (0033/003). This entire site is increased from the existing height limit of 40 feet to 85 feet. The Rezone of this eligible district was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could have significant impacts to this District.

- Designated Dietle Residence Article 10 Landmark No.48 (294 Page Street, Parcel 0839/017). Located within and adjacent to the Hayes Valley Residential Historic District, an eligible California Register Historic District, the Rezone includes this parcel which is rezoned to RTO-1.This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Designated Nightingale House Article 10 Landmark No. 47 (201 Buchanan Street, Parcel 0858/002). Located within and adjacent to the Hayes Valley Residential Historic District, an eligible California Register Historic District, the Rezone includes this parcel which is rezoned to RTO-1.This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Designated McMorry-Lagan Building Article 10 Landmark No.164 (188-198 Haight Street, Parcels 0852/033 and 0852/034). Located within and adjacent to the Hayes Valley Residential Historic District, an eligible California Register Historic District, the Rezone includes this parcel which is rezoned to RTO-1.This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Designated Duboce Park Article 10 Historic District, specifically the contributory buildings located along Waller and Steiner Streets being rezoned RTO-1. Although certain parcels within the Duboce Park Historic District are proposed for removal from the Rezone by a pending amendment to the Upzone legislation (see list below), the contributory buildings located along Waller and Steiner Streets would remain in the Rezone. This Historic District was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

Historic Resources Evaluated in 2022 Housing Element and 2022 EIR, But Now with Significant Height Increases

- Designated St. Luke's Episcopal Church, National Register No. 100009644 (1755 Clay; Parcel 0622/013). Included in the 2022 EIR as being upzoned from its existing height limit of 80 feet to 240 feet, but height increased by the Rezone to 350 feet with a base height of 140 feet. These increased heights were not studied in the 2022 EIR and could have significant impacts to this historic site. Further, as the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed from the new base height.

- Designated Paige Motor Company National Register No. 83001234 (1699 Van Ness Parcel 0642/001). Included in the 2022 EIR as being upzoned from existing height limit of 80 feet to 240 feet, but height increased by the Rezone to 350 feet with a base height of 140 feet. These increased heights were not studied in the 2022 EIR and could have significant impacts to this historic site. Further, as the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed from the new base height.

- Eligible Ocean Avenue Commercial Historic District, a documented eligible California Register Historic District under review by the Planning Department. The EIR analyzed the height along Ocean Avenue at a height of 65 feet, which was increased by the Rezone to 85 feet. This increased height was not studied in the 2022 EIR and could have significant impacts to this Historic District.

- Eligible fully documented Ingleside Terraces National Register Historic District submitted to the State Historic Preservation Office and awaiting hearing by the State Historical Resource Commission. The EIR analyzed the height along Ocean Avenue, Block 6915, with a height of 65 feet, which was increased by the Rezone to both 85 feet and 140 feet. These increased heights were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could have significant impacts on this fully documented historic district.

- Designated St. Francis Wood National Register Historic District No. 100007846 was listed on June 30, 2022. This historic district was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone could have significant impacts on this historic district.

- *The Gardens in the City; San Francisco Residence Parks, 1906-1940, Historic Context Statement* identified 8 residence parks neighborhoods as eligible historic districts. Since this was last heard by the Historic Preservation Commission in April 2021, St. Francis Wood has been listed on the National Register of Historic Place No. 100007846 and Ingleside Terraces has been fully documented as a National Register Historic District and submitted to the State Historic Preservation Office. Six other neighborhoods Jordan Park, West Clay Park, Forest Hill and Forest Hill Extension, Sea Cliff, Lincoln Manor and

Balboa Terrace are identified as potential historic districts. These six neighborhoods would be impacted by upzoning in and along the edges.

- Historic Category "A" rated buildings across the city would be impacted by the Rezone as it affords no protection for these previously identified, but not designated historic resources. The City of San Francisco Planning Department has previously required full Historic Resource Evaluations for projects involving Category "A" rated buildings. This policy change was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

The following landmarks and contributors to historic districts designated pursuant to Article 10 of the San Francisco Planning Code may be removed from the Upzone by a pending amendment to the Upzone legislation:

- Designated Telegraph Hill Article 10 Historic District. The Rezone includes this entire Historic District, which was not in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Alamo Square Article 10 Historic District. The Rezone includes most of this Historic District, including increased heights from 40 feet to 50 feet along Scott Street. This District was not in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to the District.

- Designated Webster Street Article 10 Historic District. The Rezone includes this entire Historic District, which was not in the 2022 Housing Element or analyzed in the EIR.

- Designated Haslett Warehouse, both National Register No. 75000172 and Article 10 Landmark No. 57 (680 Beach Street; Parcel 0010/002). he Rezone includes this parcel, owned by the United States National Park Service, upzoning it from its existing height of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the EIR.

- Designated San Francisco Art Institute Article 10 Landmark No 85 including the Diego Rivera Gallery Landmark No 284 (800 Chestnut Street; Parcel 0049/001). This parcel is rezoned from its existing height of 40 feet to 50 feet. This was not included in the 2022 Housing Element or analyzed in the EIR.

- Designated Ghiradelli Square, both National Register No. 82002249 and Article 10 Landmark No. 36 (920 North Point; Parcel 0452/002). This parcel is rezoned from its existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the EIR.

- Designated Goodman Building/Emeric Building, both National Register No. 75000473 and Article 10 Landmark No. 71 (1117 Geary Blvd; Parcel 0714/018). This parcel is rezoned from its existing height limit of 130 feet to 650 feet. The Rezone also increases the base height limit from 130 feet to 260 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or

other State programs that provide density or development bonuses. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 650 feet, which could result in significant impacts to this historic resource.

- Designated First Unitarian Church Article 10 Landmark No. 40 (1187 Franklin Street; Parcel 0713/034). This parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and, as the density is form-based, use of the State Density Bonus or other State programs that provide development bonuses would be encouraged. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 650 feet, which could result in significant impacts to this historic resource.

- Designated Earl C. Anthony Packard Showroom Article 10 Landmark No. 153 (901 Van Ness Avenue; Parcel 0719/002). The parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and, as the density is form-based, use of the State Density Bonus or other State programs that provide development bonuses would be encouraged. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 500 feet and 350 feet, which could result in significant impacts to this historic resource.

- Designated Don Lee Auto Showroom, both National Register No. 01001179 and Article 10 Landmark No.152 (1000 Van Ness Avenue; Parcel 0715/014). This parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and as the density is form-based, use of the State Density Bonus or other State programs that provide development bonuses would be encouraged. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 500 feet and 650 feet, which could result in significant impacts to this historic resource.

- Designated Stradtmuller House, both National Register No. 76000523 and Article 10 Landmark No. 35 (819 Eddy Street; Parcel 0743/015). This parcel is rezoned from its existing height limit of 130 feet to 300 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 350 feet, which could result in significant impacts to this historic resource.

- Designated Engine Company Number 31 Fire House Article 10 Landmark No. 220 (1088 Green St (0121/010). This parcel is now within the Rezone but was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic building.

- Designated Clay Theater Article 10 Landmark No. 302 (2261 Fillmore Street; Parcel 0630/002). This parcel and area of Fillmore Street are rezoned from their existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and this could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 65 feet, which could result in significant impacts to this historic resource.

- Designated Calvary Presbyterian Church National Register No 78000755 and Article 10 Landmark No. 103 (2501 Fillmore Street; Parcel 0587/027). This parcel and area of Fillmore are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this historic site.

- Designated Grace Cathedral Article 10 Landmark No. 170 (1100 California Street; Parcel 0246/001). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR. This could result in significant impacts to this site.

- Designated Chambord Apartments, both Article 10 Landmark No. 106 and National Register No. 84001184 (1298 Sacramento Street; Parcel 0221/125). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR. This could result in significant impacts to this site.

- Designated Old Flood Mansion, Pacific Union Club, both Article 10 Landmark No. 64 and National Register No. 66000230 (1000 California Street; Parcel 0245/001). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR. This could result in significant impacts to this site.

- Designated Westfield House Article 10 Landmark No. 135 (1198 Fulton Street, Parcel 0777/015) located in the Alamo Square Article 10 Historic District. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR. The Rezone could result in significant impacts to this historic site and the Alamo Square Historic District.

- Designated Third Baptist Church Complex Article 10 Landmark No. 275 (1399 McAllister Street, Parcel 0778/013). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR. The Rezone could result in significant impacts to this historic site.

- Designated Archbishop's Mansion Article 10 Landmark No. 151 (1000 Fulton Street, Parcel 0778/006) located in the Alamo Square Article 10 Historic District. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone could result in significant impacts to this historic site and the Alamo Square Historic District.

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- Designated Abner Phelps House, both National Register No. 71000187 and Article 10 Landmark No. 32 (1111 Oak Street; Parcel 1218/050). This parcel is rezoned from its existing height limit of 40 feet to 50 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Designated Sarah Mish House, both National Register No. 79000534 and Article 10 Landmark No. 62 (1153 Oak Street; Parcel 1218/029). This parcel is rezoned from its existing height limit of 40 feet to 50 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Firehouse Engine Company No. 2, both Article 10 Landmark No. 89 (1152 Oak Street, Parcel 1215/010) and a contributor to the Buena Vista North Historic District, an eligible California Register Historic District. The inclusion of this parcel in the Rezone was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned 65 feet and 85 feet, this could result in significant impacts to this historic resource.

- Designated Richard Doolan/Norman Larson Residence Article 10 Landmark No. 253 (557 Ashbury Street, Parcel 1231/009). As the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned to 65 feet with form-based density and rezoned to RTO-C, this could result in significant impacts to this historic resource.

- Designated Theodore Green Apothecary Article 10 Landmark No. 182 (500 Divisadero Street, Parcel 1203/017A). This parcel is rezoned from its existing height limit of 65 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Designated Charles L. Hinkel House and Carriage House Article 10 Landmark No. 190 (280 Divisadero Street; Parcel 1238/023). This parcel is rezoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Designated Old Saint Patrick's Church Article 10 Landmark No. 6 (1820 Eddy Street, Parcel 1127/007A). This parcel now included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-3 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing

Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned to 65 feet with form-based density and rezoned to RTO-C, this could result in significant impacts to this historic resource.

- Glazer-Keating House Article 10 Landmark No. 251 (1110 Taylor Street, Parcel 0222/018). The Rezone now includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Merryvale Antiques (S.F. Gas Light Co.) Article 10 Landmark No 58 (3640 Buchanan Street, Parcel 0459/003) This parcel is included in the Rezone and changed to form-based density (density decontrol). The Rezone now includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Ladies Protection and Relief Society Article 10 Landmark No 320 (3400 Laguna Street, Parcel 0471/003). The Rezone now includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Blackstone Court Article 10 Historic District (30 Blackstone Court, 1545 Lombard Street, and 1549 Lombard Street (Parcels 0504/003, 0504/003H & 0504/019). The Rezone increases the height of two of the parcels in this District from 40 feet to140 feet and the density is changed to form-based. This Historic District was not included in the 2022 Housing Element or analyzed in the EIR. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned to 140 feet with form-based density, this could result in significant impacts to this historic resource.

- North End Police Station and Garage Article 10 Landmark No. 218 (2475 Greenwich, Parcel 0513/015). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Filbert Street Cottages Article 10 Landmark No 232 (1338 Lombard Street, Parcel 0524/031). This parcel is rezoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Metro Theater Article 10 Landmark No 261 (2055 Union Street, Parcel 0541/018. The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 65 feet. This site was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- The Colonial Dames (McElroy) Octagon House Article 10 Landmark No. 17 and National Register No 720000250 (2645 Gough Street, Parcels 0544/001 and 0544/001C. This historic site, included in the Upzone, is rezoned from its existing height limit of 40 feet to 65 feet and its density changed to form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Alhambra Theater Article 10 Landmark No. 21 (2320-366 Polk Street, Parcel 0548/022). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 to 85 and now form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- The Burr Mansion Article 10 Landmark No.31 and National Register #14000967 (1772 Vallejo Street, Parcel 0552/029). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Golden Gate Valley Carnegie Library Article 10 Landmark No. 300 (1801 Green Street, Parcel 0554/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Casebolt House Article 10 Landmark No 51 (2727 Pierce Street, Parcel 0560/005). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Church For The Fellowship of All People Article 10 Landmark No. 309 (2041 Larkin Street, Parcel 0572/003). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Engine Company No. 8 Truck No. 4 Article 10 Landmark No. 188 (1648 Pacific St., Parcel 0574/011). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 feet to 350 feet. This extreme upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 350 feet, this could result in significant impacts to this historic resource.

- Talbot-Dutton House Article 10 Landmark No. 57 (2200 Franklin/1782 Pacific Avenue, Parcel 0575/010). The Rezone includes this parcel, which is upzoned from its existing height limit of 80 feet to 240 feet, its density is changed form-based, and rezoned from residential to RTO-C. This extreme rezoning was not included in the 2022 Housing Element or analyzed in the2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 240 feet to 350 feet, this could result in significant impacts to this historic resource.

- St. Brigid's Church Article 10 Landmark No. 252 (2151 Van Ness Avenue, Parcel 575/015). The Rezone includes this parcel, which is upzoned from its existing height limit of 80 feet to 350. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 240 feet to 350 feet, this could result in significant impacts to this historic resource.

- Bourne Mansion Article 10 Landmark No 38 (2550 Webster Street, Parcel 0580/013). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 65 feet, and rezoned from residential to RTO-C. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 65 feet, this could result in significant impacts to this historic resource.

- Leale House Article 10 Landmark No. 45 (2475 Pacific Avenue, Parcel 0587/018). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Whittier Mansion Article 10 Landmark No. 75 and National Register No 76000524 (2090 Jackson St, Parcel 0591/007). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Haas-Lilienthal House Article 10 Landmark No. 69 and National Register No 730000438 (2007 Franklin St. 0600/002). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Spreckels Residence Article 10 Landmark No. 197 (2080 Washington Street, Parcel 0601/005. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Sacred Heart Parish Complex Article 10 Landmark No.316 and National Register 10000112 (660 Oak Street, Parcel 0828/012; 735 Fell Street, Parcel 0828/022A; 554 Filmore Street, Parcel 0828/22; and 546-548 Filmore Street, Parcel 0828/21). The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the EIR.

- Market Street Masonry Historic District Article 10 Historic District and listed in the California Register of Historical Resources (7 non-contiguous historic buildings on Market Street Between Franklin Street and Valencia Street, including Parcels 3504/038, 3504/040, 3504/046, 3504/001, 0854/004 and 0854/005, and the Miramar Apartments at 1582 Market Street, Parcel 0836/010. The Rezone includes the parcels in this District, which are upzoned from their existing height limit of 85 feet to 140 feet. Even if these parcels are removed from the Upzone, because they are surrounded by parcels rezoned to 140 feet, this could result in significant impacts to this historic resource.

- Health Sciences Library Article 10 Landmark No. 115 (2395 Sacramento Street, Parcel 0637/016). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- William Vale House Article 10 Landmark No. 168 (2226 California Street, Parcel 0637/040). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet, and the density is changed to form-based. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 85 feet, this could result in significant impacts to this historic resource.

- Chambers Mansion Article 10 Landmark No.119 (2220-2222 Sacramento Street, Parcel 0627/054). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Richard E. Queen House Article 10 Landmark No. 198 (2212 Sacramento Street, Parcel 0627/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Atherton House Article 10 Landmark No. 70 and National Register No. 79000527 (1990 California Street, Parcel 0640/010). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet, and rezoned from residential to RTO-C. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 85 feet, this could result in significant impacts to this historic resource.

- Isaac Wormser House/John C. Coleman House Article 10 Landmark No. 53 (1834 California Street, Parcel 0641/005). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Lilienthal-Orville Pratt House Article 10 Landmark No. 55 (1818-1820 California Street, Parcel 0641/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Golden Gate Commandery of the Knights Templar (Macedonia Missionary Baptist Church Article 10 Landmark No. 202 (2135 Sutter Street, Parcel 0682/006). The Rezone includes this parcel, which is upzoned from its existing height limit of 50 feet to 85 feet and is now form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Richardson Hall Article 10 Landmark Nos. 256, 257, and 258 (55 Laguna Street, Parcel 0870/001). The Rezone includes these Landmarks, which are upzoned from their existing height limits to 85 feet and their density has been changed to form-based. These buildings were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Carmel Fallon Building Article 10 Landmark No. 223 and Contributor to the designated Hayes Valley Residential Historic District listed on the California Register of Historic Resources (1800-1806 Market Street, Parcel 0871/014). The Rezone includes this parcel, which is upzoned from its existing height limit of 85 feet to 120 feet and its density has been changed to form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone,

because it is surrounded by parcels rezoned to 140 feet, this could result in significant impacts to this historic resource.

- Roos Residence both Article 10 Landmark No. 56 and National Register 09000805 (3500 Jackson Street, Parcel 0970/002). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Ellingwood House Article 10 Landmark No. 207 (2799 Pacific Ave, Parcel 0978/010) and within the California Register eligible Presidio Heights Historic District. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Koshland House Article 10 Landmark No. 95 and National Register No. 84001186, within the CA eligible Presidio Heights Historic District. (3800 Washington, Parcel 0989/028). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Ortman-Shumate House Article 10 Landmark No. 98 (1901 Scott Street, Parcel 1027/003). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Theodore Roosevelt Jr. High School Article 10 Landmark No. 285 (460 Arguello Street, Parcel 1061/049). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- San Francisco Memorial Columbarium Article 10 Landmark No. 209 (1 Loraine Court, Parcel 1084/002).The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Clunie House Article 10 Landmark No. 128 (301 Lyon Street, Parcel 1207/008). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Alfred G. Hanson Residence Article 10 Landmark No. 196 (128 27th Avenue, Parcel 1332/049). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- St. John's Presbyterian Church Article 10 Landmark No. 83 (201 Arguello Boulevard, Parcel 1361/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Campfire Girls Building Article 10 Landmark No. 169 (325 Arguello Boulevard), Parcel 1432/003). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Richmond Branch Library Article 10 Landmark No. 247 (351 9th Avenue, Parcel 1441/007). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Refugee Shack Article 10 Landmark No. 171 (1227 24th Avenue, Parcel 1726/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Doelger Building Article 10 Landmark No.265 (320-26 Judah Street, Parcel 1763/020). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet and its density has been changed to form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 85 feet, this could result in significant impacts to this historic resource.
- Old Fire House Article 10 Landmark No.29 (1348 10th Avenue, Parcel 1764/031). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Sunset Branch Library Article 10 Landmark No. 239 (1305-49 18th Street, Parcel 1773/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 65, 85 and 140 feet, this could result in significant impacts to this historic resource.
- Shriners' Hospital for Crippled Children Article 10 Landmark No.221 (1601 19th Avenue, Parcel 1924/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- San Francisco Conservatory of Music Article 10 Landmark No. 242 (1201 Ortega Street, Parcel 2115/037). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- The McCormick House Article 10 Landmark No. 208 (4040-4042 17th Street, Parcel 2623/012). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 120 feet, its density is changed form-based, and it is rezoned from residential to RTO-C. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 140 feet with form based density, this could result in significant impacts to this historic resource.
- Alfred E. (Nobby) Clarke Mansion Article 10 Landmark No. 80 (250 Douglass St., Parcel 2700/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Miller-Joost House Article 10 Landmark No. 79 (3224 Market Street, Parcel 2704/040). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- David Lewis House Article 10 Landmark No.186 (4143 23rd Street, Parcel 2804/040). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 171 San Marcos Avenue (aka Cowell House) Article 10 Landmark No. 270 (171 San Marcos Avenue, Parcel 2882/035). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- El Rey Theater Article 10 Landmark No.274 (1970 Ocean Avenue, Parcel 3280/018). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Juvenile Court and Detention Center Article 10 Landmark No. 248 (170 Otis Street, Parcel 3513/207). The Rezone includes this parcel, which is upzoned from its existing height limit of 125 feet to 160 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 396-398 12th Street (aka San Francisco Eagle Bar) Article 10 Landmark No. 295 (396-398 12th Street, Parcel 3522/014). The Rezone includes this parcel, which is upzoned from its existing height limit of 55 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Saint Francis Lutheran Church Article 10 Landmark No. 39 (152 Church Street, Parcel 3537010). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Swedish American Hall Building Article 10 Landmark No. 267 (2168-2174 Market Street, Parcel 3542/062). The Rezone includes this parcel, which is upzoned from its existing height limit of 40-50 feet to 120 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 120 feet and 160 feet with form based density, this could result in significant impacts to this historic resource.

- 2117-2123 Market Street (aka New Era Hall) Article 10 Landmark No. 277 (2117-2123 Market Street, Parcel 3543/012). The Rezone includes this parcel, which is upzoned from its existing height limit of 40-50 feet to 120 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 120 feet and 160 feet with form based density, this could result in significant impacts to this historic resource.

- 22 Beaver Street (aka Benedict-Gieling House) Article 10 Landmark No. 284 (22 Beaver Street, Parcel 3561060). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 50 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- The Jose Theater/Names Project Building Article 10 Landmark No. 241 (2362 Market Street, Parcel 3562/011). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 feet to 120 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the

Upzone, because it is surrounded by parcels rezoned to 120 feet and 160 feet with form based density, this could result in significant impacts to this historic resource.

- Mission Dolores Article 10 Landmark No. 1 and National Register No.72000251 (310-20 Dolores Street, Parcel 3566/001). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 50 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the EIR.

- Mission High School Article 10 Landmark No. 255 (3750 18th Street, Parcel 3579/006). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Twin Peaks Tavern Article 10 Landmark No. 264 (3997 17th Street, Parcel 3582/071). The Rezone includes this parcel as being upzoned from its existing height limit of 65 feet to 160 feet and its density is changed to form-based. While this site was included in the 2022 Housing Element and the 2022 EIR as upzoned to 85 feet, the Rezone upzones it to 160 feet. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 160 feet with form based density, this could result in significant impacts to this historic resource.

- Castro Theater Article 10 Landmark No. 100 (429-431 Castro Street, Parcel 3582/085). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 feet to 85 feet and its density is changed to form-based. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is adjacent to parcels rezoned to 160 feet with form based density, this could result in significant impacts to this historic resource.

- Castro Camera Article 10 Landmark No. 227 (573-75 Castro Street, Parcel 3583/061). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 50 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Axford House Article 10 Landmark No. 133 (1190 Noe Street, Parcel 6538/048). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Carnegie Noe Valley/Sally Brunn Branch Library Article 10 Landmark No. 259 (451 Jersey Street, Parcel 6539/034). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 651 Duncan Street (aka Lyon-Martin House) Article 10 Landmark No. 292 (651 Duncan Street, Parcel 6604/036). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Sunnyside Conservatory Article 10 Landmark No. 78 (236 Monterey Blvd, Parcel 6770/057). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Joseph Leonard/Cecil F. Poole House Article 10 Landmark No. 213 (90 Cedro Avenue, Parcel 6908/016). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 1345 Ocean Ave (aka Ingleside Presbyterian Church and the Great Cloud of Witnesses) Article 10 Landmark No. 273 (1345 Ocean Avenue, Parcel 6942/050). The Rezone includes this parcel, which is upzoned from its existing height limit of 50 feet to 85 feet.

- This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Sherman House Article 10 Landmark No. 49 (2160 Green Street, Parcels 0540/030 and 0540/028). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Gibbs Residence and Caretaker's Cottage Article 10 Landmark 203 (2622-24 Jackson Street and 2624-29 Pacific Avenue, Parcels 0585/008, 0585/009 and 0585/010). The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the 2022 EIR.
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- Southern Pacific Co. Hospital Complex Article 10 Landmark No. 192 and National Register 89000319 (1400-1599 Fell Street & 1509-1599 Hayes Street, Parcels 1206/002 and 1206/003). Also within the Panhandle Historic District, an eligible California Register Historic District. The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Edward Coleman House Article 10 Landmark No. 54 (1701 Franklin Street, Parcels 0641/014 and 0641/015). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Duboce Park Article 10 Historic District, is proposed for removal from the Rezone except for the contributory buildings located along Waller and Steiner Streets are proposed to be rezoned RTO-1, remaining in the Rezone. This Historic District was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

Attachment 2: North Beach National Register of Historic Places Historic District
Parcel Analysis Within Rezone
November 30, 2025
Compiled by Bridget Maley, architecture + history, llc

Address	APN Number	Year Built	District Status
490 Lombard St	0062017B	1926	C
1916-18 Stockton St	0062017C	1940	C
1922-24 Stockton St	0062017D	1940	C
1934-36 Stockton St	0062017E	1940	C
1946-48 Stockton St	0062019	1908	C
1952-56 Stockton St	0062020	1908	C
1958-60 Stockton St	0062021	1906	C
379-99 Chestnut St/1952-56 Stockton	0062022	1906	C
1940 Stockton St	0062052-058	1980	NC
401 Chestnut St/1957-61 Stockton	0063001	c. 1906	C
1951-55 Stockton St	0063002	1906	C
1943-47 Stockton St	0063003	1907	C
1935-41 Stockton St	0063004	1907	C
1929-33 Stockton St	0063005	1907	C
1923-25 Stockton St	0063006	1908	C
1915-17 Stockton St	0063007	1907	C
1901-05 Stockton St	0063009	1906	C
520-24 Lombard St	0063010	1911	C
526-30 Lombard St	0063011	1909	C
532-36 Lombard St	0063012	1912	C
538-42 Lombard St	0063013	1912	C
544-46 Lombard St	0063014	1916	C
548 Lombard St	0063015	1926	NC
566-76 Lombard St	0063017	1908	C
590-94 Lombard St	0063018	1925	C
2006-08 Powell St	0063018A	1924	C

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Address	APN Number	Year Built	District Status
2018-20 Powell St	0063018C	1924	NC
2024-30 Powell St	0063019	1906	C
2038-40 Powell St	0063021	1956	NC
2044-48 Powell St	0063022	1909	C
2050-64 Powell St	0063023	1907	C
475 Chestnut St	0063024	1946	C
461-67 Chestnut St	0063025	c. 1907	C
455-59 Chestnut St	0063025A	1908	C
449-53 Chestnut St	0063026	1912	C
443-47 Chestnut St	0063027	1908	C
437-41 Chestnut St	0063027A	1908	C
427 Chestnut St	0063028	1932	C
421-23 Chestnut St	0063029	1907	C
1907-13 Stockton St	0063030-033	1906	C
560-64A Lombard St	0063034-036 & 16A	1907	C
2032-34 Powell St	0063037-038	1912	C
2061-65 Powell St	0064001	1906	C
2055-59 Powell St	0064002	1908	C
2049-53 Powell St	0064003	1909	C
2043-47 Powell St	0064004	1909	C
2035-41 Powell St	0064005	1909	C
2027-31 Powell St	0064006	1907	C
2017-21 Powell St	0064007	1912	C
602-04 Lombard St	0064009	1926	C
616-18 Lombard St	0064032	1922	C
2011-15 Powell St	0064033-035	c. 1912	C
513-19 Lombard St	0076001	1917	C

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Address	APN Number	Year Built	District Status
1847-57 Stockton St	0076003	1910	C
1843 Stockton St	0076004	1906	NC
1815-25 Stockton St	0076006	1907	C
1807-09 Stockton St	0076007	1907	C
1801-03 Stockton St	0076008	1908	C
622-24 Greenwich St	0076009	1908	C
628-30 Greenwich St	0076010	1908	C
638-42 Greenwich St & 632A Greenwich	0076011	1906	C
644-46 Greenwich St	0076012	1925	C
652-56 Greenwich St	0076013	1906	C
658-64 Greenwich St	0076014	1907	C
666-76 Greenwich St	0076015	1906	C
678-80 Greenwich St	0076016	1906	C
1906 Powell St & 690-92 Greenwich	0076017	1923	C
1918-22 Powell St	0076020	1906	C
1930-34 Powell St	0076022	1912	C
1936-38 Powell St	0076023	1906	C
1942-46 Powell St	0076024	1912	C
1948-54 Powell St	0076025	1914	C
1956-66 Powell St	0076025A	1914	C
585-87 Lombard St	0076025B	1908	C
567-79 Lombard St	0076026	1914	C
563-65 Lombard St	0076027	1906	C
551-61 Lombard St	0076027A	1914	C
547-49 Lombard St	0076028	1913	C
537-39 Lombard St	0076030	1907	C

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Address	APN Number	Year Built	District Status
1 Tuscany Alley	0076032	1906	C
529-31 Lombard St	0076033	1925	C
525-27 Lombard St	0076033A	1925	C
543-45 Lombard St	0076034-035	1925	C
1839-41 Stockton St	0076054-055	c. 2014	NC
1924-26 Powell St	0076056-057	1922	C
1865-76 Stockton St	0076058-059	1906	C
5-11 Edith St/1721-25 Grant	0077008	1913	C
1707-09 Grant Ave	0077009	1907	NC
1703-05 Grant Ave	0077010	1909	NC
500-12 Greenwich St	0077011	1908	C
514-16 Greenwich St & 15-17 Edith	0077012	1924	C
520-22 Greenwich St & 19-21 Edith	0077013	1910	C
528-30 Greenwich St & 25-27 Edith	0077014	1909	C
532-34 Greenwich St	0077015	1908	C
540 Greenwich St & 33-35 Edith	0077016	1931	C
544-46 Greenwich St & 43-45 Edith	0077017	1912	C
550-52 Greenwich St & 49-51 Edith	0077018	1912	C
558-60 Greenwich St	0077019	1911	C
562-64 Greenwich St	0077020	1908	C
568-70 Greenwich St	0077021	1908	C
586-90 Greenwich St	0077023	1908	C
1800-04 Stockton St	0077023A	1907	C
1814 Stockton St	0077024	1966	C
1816-20 Stockton St	0077025	1911	C
1822-26 Stockton St	0077026	1915	C
1828-32 Stockton St	0077027	1914	C

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Address	APN Number	Year Built	District Status
1848 Stockton St	0077030	1907	C
1852-56 Stockton St	0077031	1906	C
1858-60 Stockton St	0077032	1914	C
1864-66 Stockton St	0077032A	1915	C
576-80 Greenwich St	0077049-051	1997	NC
1840-44 Stockton St	0077052-054	1911	C
1653-67 Grant Ave	0088001	1908	C
1647-51 Grant Ave	0088002	1908	C
1639-45 Grant Ave	0088003	1913	C
1635-37 Grant Ave	0088004	1908	C
12-26 Medau Place & 1615-33 Grant	0088005	1908	C
1601 Grant Ave	0088006	1965	NC
540-50 Filbert St & 51-61 Medau	0088009	1909	C
552-56 Filbert St & 63-65 Medau	0088010	1906	C
558-62A Filbert St	0088011	1907	C
566 Filbert St	0088012	c. 1907	C
570-74 Filbert St & 12-18 Krausgrill	0088013	1907	C
579-81 Greenwich St	0088023	1908	C
561 Greenwich St	0088025	1961	C
551-57 Greenwich St	0088026	1911	C
547-49 Greenwich St	0088027	1911	C
533-57 Greenwich St	0088029	1912	C
517-23 Greenwich St	0088031	1912	C
1-3 Kramer Place	0088034	1910	C
577 Greenwich St	0088036	1909	C
567-69 Greenwich St	0088037	1906	C
19-33 Medau Place	0088041-048	1909	C

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Address	APN Number	Year Built	District Status
526-30 Filbert St	0088052-054	1912	C
532-36 Filbert St	0088055-057	c. 1986	NC
539-45 Greenwich St	0088058-061	1913	C
525-31 Greenwich St	0088071-072	1914	C
7-9 Kramer Place	0088073-074	1910	C
608-20 Filbert St	0089011	1951	C
622-26 Filbert St	0089013	1913	C
630-34 Filbert St	0089014	1910	C
650-60 Filbert St	0089015	1912-1939	C
666 Filbert St	0089016	1917	C
673-77 Greenwich St	0089022A	1915	C
667-71 Greenwich St	0089022B	1914	NC
695-99 Greenwich St	0089022C	1925	C
659-59BGreenwich St	0089024	1907/2002	C/NC
651-55 Greenwich St	0089025	1908	C
643 Greenwich St	0089026	1907	C
637-41 Greenwich St	0089027	1911	C
637A-641A Greenwich St	0089027	unknown	C
619-21 Greenwich St	0089029	1961	C
1856-60 Powell St	0089031-036	1934	C
625-27 Greenwich St	0089038	1908	C
631A-C Greenwich St	0089039-041	1983	NC
1850-52 Powell St	0089042-043	1933	C
661-65 Greenwich St	0089044-046	1906	C
680 Filbert St	0089048-049	1971	NC
690 Filbert St	0089050-051	1961	NC

EXHIBIT C

Shawn Smallwood, PhD
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24 October 2025

RE: San Francisco Housing Element 2022 Update FEIR Addendum

Dear Mr. Drury,

I write to comment on potential impacts on biological resources from the proposed Addendum to the San Francisco Housing Element 2022 Update Final Environmental Impact Report (FEIR). The FEIR, which was adopted by the Board of Supervisors and later signed by the Mayor on 31 January 2023, evaluated the impacts on the environment that could result from adoption and implementation of the San Francisco Housing Element 2022 Update. According to the Addendum, the FEIR anticipated "future actions, such as San Francisco Planning Code … amendments, designation of housing sustainability districts, and approval of development projects consistent with the goals, policies, and actions of the housing element update." The Addendum characterizes the proposed actions as "reasonably foreseeable changes," and states that its purpose "is to evaluate the environmental impacts of the rezoning program and document the San Francisco Planning Department's … determination that these impacts are adequately addressed in the FEIR." I am concerned that the proposed actions in the Addendum have not been adequately addressed, and that the action's impacts on wildlife would be excessive and highly significant.

My qualifications for preparing expert comments are the following. I hold a Ph.D. degree in Ecology from University of California at Davis, where I also worked as a post-graduate researcher in the Department of Agronomy and Range Sciences. My research has been on animal density and distribution, habitat selection, wildlife interactions with the anthrosphere, and conservation of rare and endangered species. I authored many papers on these and other topics. I served as Chair of the Conservation Affairs Committee for The Wildlife Society – Western Section. I am a member of The Wildlife Society and Raptor Research Foundation, and I've lectured part-time at California State University, Sacramento. I was Associate Editor of wildlife biology's premier scientific journal, The Journal of Wildlife Management, as well as of Biological Conservation, and I was on the Editorial Board of Environmental Management. I have performed wildlife surveys in California for thirty-seven years. My CV is attached.

POTENTIAL IMPACTS ON THE WILDLIFE COMMUNITY

The Addendum claims that the FEIR's analysis of wildlife impacts potentially caused by the originally planned 50,000 residential units have already addressed the impacts of the additionally proposed of 4,000 residential units. It further claims that the change in

outlay of the height and density of the originally planned 50,000 residential units are irrelevant to the analysis of potential impacts on wildlife. Deemed in no need of additional environmental review is the planned addition of 4,000 residential units, major shifts in the spatial distribution of the original 50,000 units, and increases in maximum building heights from 300 feet to 650 feet.

The Addendum (p. 48) points out that the FEIR had determined that future development associated with the adopted housing element would not adversely affect candidate, sensitive, or special-status species or sensitive natural communities, nor would it interfere with wildlife movement. I disagree with these determinations as they applied to the originally planned 50,000 residential units, as these determinations were simply not credible in the face of this much change to the environment. Here and now the City attempts to extend these same claims to the development associated with an additional 4,000 residential units and to substantial shifts in the spatial and vertical outlay of all 54,000 residential units.

One rationalization for the determinations was that special-status species such as peregrine falcon are adapted to the structural environment of San Francisco. Another was that compliance with existing state and federal regulations would ensure less-than-significant impacts to nesting birds. And for bats, the rationale was that compliance with the open space element of the general plan (Chapter 8 of the San Francisco Environment Code), would avoid potential impacts. These rationalizations, however, were speculative, having cited no evidence in their support. There was no citation of any comparative study of peregrine falcon population performance within the City versus in natural areas. There was no citation of monitoring data that would support the notion that existing state and federal regulations have been preventing significant impacts to nesting birds in the face of development pressure. There was no citation of monitoring data that would support the notion that Chapter 8 of the San Francisco Environment Code has managed to avoid development impacts on bats. Instead of relying on scientific inference, each argument leading to less-than-significant impact determinations was speculative. And this same strategy is carried forward in the Addendum with respect to the added 4,000 residential units and the changes in lateral and vertical outlay.

In fact, the evidence is overwhelming that overall bird abundance is on the decline, having declined 29% across North America over the past half-century (Rosenberg et al. 2019). In fact, all but three of the bat species in California are special-status species, indicating that bats as a taxonomic group are of serious conservation concern in California. And in fact, along with my co-investigator I have measured substantial declines in birds and special-status species as results of development projects (Smallwood and Smallwood 2023). The Addendum selects Peregrine falcon as an anecdote to imply that all birds simply adapt to the cityscape, but even the Peregrine falcon is vulnerable to window collisions. As another anecdote to the Addendum's, I happened to be in a meeting with attorneys of the California Attorney General's Office and agents with the U.S. Fish and Wildlife Service when we observed a Peregrine falcon nearly collide with our 14th story window as it chased after a rock pigeon in Oakland. And yet another anecdote from a few years ago, a Peregrine falcon fledgling fatally

collided with a window on the same UC Berkely building where it attempted its first flight from the nest. Peregrine falcons are vulnerable to window collision mortality just like any other bird, and perhaps even more so.

The Addendum does not consider the potential loss and fragmentation of the aerosphere in which these species travel and forage. The aerosphere is that part of the gaseous atmosphere where birds and bats and other volant animals with wings migrate, disperse, forage, perform courtship and where some of them mate (Davy et al. 2017, Diehl et al. 2017). Nor does the Addendum give any consideration to the potential loss and fragmentation of aerohabitat, which is that portion of the aerosphere used by each species (Kunz et al. 2008), and usually within 1,000 feet of the ground. Although both the peregrine falcon and bats often take prey on the ground, these animals are known for taking prey largely on the wing. These animals hunt other volant wildlife, which means that both these hunters and their prey perform vital life functions and interact with each other within the aerosphere. As for nesting birds, there would be no nesting birds without the birds' access to the aerosphere. Despite the vital importance of the aerosphere to peregrine falcons, nesting birds, and to bats, the Addendum fails to recognize the aerosphere as essential habitat to volant wildlife.

The Addendum does recognize that the new buildings would pose barriers to movement and collision hazards to birds. At page 49, the Addendum warns, "Changes to building heights could result in new impacts on migratory species if they result in flight paths being obstructed, more bird strikes, or impacts on falcon nesting habitat." The Addendum then dismisses these potential impacts by citing the adoption in the Aesthetics section of the FEIR of planning code section 139's Standards for Bird-Safe Buildings. However, there exist major logic problems with this purported solution. First, the standards for bird-safe buildings do not avoid the barrier effects of buildings, and in fact the strategic objective of bird-safe building guidelines is to increase the visibility of buildings as barriers to bird movement so that birds less often collide with the structural glass on the exteriors of the buildings. Second, the Standards for Bird-Safe Buildings, while meritorious as a first step toward reducing bird-window collision mortality, are of unmeasured efficacy. While it is great that the City adopted the Bird-Safe Guidelines, the City has yet to follow up with any study of whether or to what degree the Standards truly minimize or reduce bird-window collision mortality. In the face of this uncertainty, the additional 4,000 residential units, greater building heights, and revised spatial distribution could result in significantly larger numbers of collision fatalities compared to the 2022 plan, despite implementation of the City's Standards for Bird-Safe Buildings.

In my assessment, there are 147 special-status species of wildlife documented near enough to the project site to warrant a closer look at their occurrence likelihoods for the purpose of predicting potential project impacts (Table 1). Of these 147 special-status species, 14 are bats that, if they truly occur where construction would take place, would be at risk of losing aerohabitat in which they travel and forage. Another 112 special-status species of wildlife would be birds, 49 of which have been documented throughout the project area, eight of which are known to be centrally located, six are known to Golden Gate Park or Lake Merced, and 19 of which have been documented as generally

coastal. All these bird species would be vulnerable to collision mortality and greater expenditures of indispensable energy to negotiate the structural hazards of another 4,000 residential units and the reallocation of vertical building heights across the planning area.

All the birds represented in Table 1 can quickly fly from wherever they have been documented to any of the new buildings that would be part of the added project, so they would all be within brief flights to the proposed project's windows. At the California Academy of Sciences, the glass facades facing adjacent gardens killed 0.077 and 0.086 birds per m^2 of glass per year (Kahle et al. 2016), which might look like small numbers at first read, but which translate to large numbers of dead birds when projected to the extent of glass in the project (see below).

Window collisions are often characterized as either the second or third largest source or human-caused bird mortality. The numbers behind these characterizations are often attributed to Klem's (1990) and Dunn's (1993) estimates of about 100 million to 1 billion bird fatalities in the USA, or more recently by Loss et al.'s (2014) estimate of 365-988 million bird fatalities in the USA or Calvert et al.'s (2013) and Machtans et al.'s (2013) estimates of 22.4 million and 25 million bird fatalities in Canada, respectively. The proposed project would impose windows in the airspace normally used by birds.

Glass-façades of buildings intercept and kill many birds, but they are differentially hazardous to birds based on spatial extent, contiguity, orientation, and other factors. At Washington State University, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a three-story glass walkway (no fatality adjustments attempted). Prior to marking the windows to warn birds of the collision hazard, the collision rate was 84.7 per year. At that rate, and not attempting to adjust the fatality estimate for the proportion of fatalities not found, 4,574 birds were likely killed over the 54 years since the start of their study, and that's at a relatively small building façade. Accounting for the proportion of fatalities not found, the number of birds killed by this walkway over the last 54 years would have been about 14,270. And this is just for one 3-story, glass-sided walkway between two college campus buildings.

Klem's (1990) estimate was based on speculation that 1 to 10 birds are killed per building per year, and this speculated range was extended to the number of buildings estimated by the US Census Bureau in 1986. Klem's speculation was supported by fatality monitoring at only two houses, one in Illinois and the other in New York. Also, the basis of his fatality rate extension has changed greatly since 1986. Whereas his estimate served the need to alert the public of the possible magnitude of the bird-window collision issue, it was highly uncertain at the time and undoubtedly outdated more than three decades hence. Indeed, by 2010 Klem (2010) characterized the upper end of his estimated range – 1 billion bird fatalities – as conservative. Furthermore, the estimate lumped species together as if all birds are the same and the loss of all birds to windows has the same level of impact.

Table 1. *Occurrence likelihoods of special-status bird species at or near the proposed project site, according to eBird/iNaturalist records (https://eBird.org, https://www.inaturalist.org) and on-site survey findings, where 'Very close' indicates within 1.5 miles of the site, "nearby" indicates within 1.5 and 4 miles, and "in region" indicates within 4 and 30 miles, and 'in range' means the species' geographic range overlaps the site.*

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
San Bruno elfin butterfly	*Callophrys mossii bayensis*	FE	In region	iNat obscured points
Monarch	*Danaus plexippus*	FC	On site	Throughout
Bay checkerspot butterfly	*Euphydryas editha bayensis*	FT	In region	iNat obscured points
Mission blue butterfly	*Icaricia icarioides missionensis*	FE	In region	iNat obscured points
Callippe silverspot butterfly	*Speyeria callippe callippe*	FE	In region	iNat obscured points
Myrtle's silverspot butterfly	*Speyeria zerene myrtleae*	FE	In region	
Crotch's bumble bee	*Bombus crotchii*	CCE	In region	
Western bumble bee	*Bombus occidentalis*	CCE	Very close	
Longfin smelt	*Spirinchus thaleichthys*	CT	In region	
Delta Smelt	*Hypomesus transpacificus*	FT, CE	In region	
Tidewater goby	*Eucyclogobius newberryi*	FE, SSC	In region	iNat obscured points
California giant salamander	*Dicamptodon ensatus*	SSC	In region	Obscured
Foothill yellow-legged frog	*Rana boylii*	FT, CE	In region	
California red-legged frog	*Rana draytonii*	FT, SSC	In region	iNat obscured points
Green sea turtle	*Chelonia mydas*	FT	In region	
Northwestern pond turtle	*Actinemys marmorata*	FC, SSC	On site	West and SW
San Francisco garter snake	*Thamnophis sirtalis tetrataenia*	FE, CE, CFP	In region	iNat obscured points
Brant	*Branta bernicla*	SSC2	On site	West and NE, along shores
Cackling goose (Aleutian)	*Branta hutchinsii leucopareia*	WL	On site	Generally throughout
Redhead	*Aythya americana*	SSC2	On site	North
Harlequin duck	*Histrionicus histrionicus*	SSC2	Very close	Presidio
Barrow's goldeneye	*Bucephala islandica*	SSC	On site	NW
Short-tailed albatross	*Phoebastria albatrus*	FE, SSC	In region	
Fork-tailed storm petrel		SSC	Very close	North and west shores
Ashy storm-petrel	*Hydrobates homochroa*	BCC, SSC	Very close	Lake Merced
Black storm-petrel	*Hydrobates melania*	SSC, BCC	Very close	NW corner of peninsula
Western grebe	*Aechmophorus occidentalis*	BCC	On site	Throughout

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Clark's grebe	*Aechmophorus clarkii*	BCC	On site	Throughout
Western yellow-billed cuckoo	*Coccyzus americanus occidentalis*	FT, CE	In region	
Black swift	*Cypseloides niger*	SSC3, BCC	On site	Central
Vaux's swift	*Chaetura vauxi*	SSC2	On site	Throughout
Calliope hummingbird	*Selasphorus calliope*	BCC	On site	Central/South
Rufous hummingbird	*Selasphorus rufus*	BCC	On site	Throughout
Allen's hummingbird	*Selasphorus sasin*	BCC	On site	Throughout
Yellow rail	*Coturnicops noveboracensis*	BCC, SSC	In region	
Ridgway's rail (San Francisco Bay)	*Rallus obsoletus obsoletus*	FE, CE, CFP	On site	North
California black rail			In range	
Black oystercatcher	*Haematopus bachmani*	BCC	On site	Throughout, mostly shoreines
Mountain plover	*Charadrius montanus*	SSC2, BCC	Very close	San Francisco Zoo
Snowy plover	*Charadrius nivosus*	BCC	On site	North and west shores, 1 central
Western snowy plover	*Charadrius nivosus nivosus*	FT, SSC	Very close	West along shore
Long-billed curlew	*Numenius americanus*	WL	On site	Throughout
Marbled godwit	*Limosa fedoa*	BCC	On site	Throughout
Black turnstone	*Arenaria melanocephala*	BCC	On site	Mostly along north, west shores
Red knot (Pacific)	*Calidris canutus*	BCC	On site	West along coast
Pectoral sandpiper	*Calidris melanotos*	BCC	Very close	Lake Merced and Presidio
Short-billed dowitcher	*Limnodromus griseus*	BCC	On site	West, North, and central
Wandering tattler	*Tringa incana*	BCC	On site	North and W, mostly shores
Lesser yellowlegs	*Tringa flavipes*	BCC	On site	North /central (Richmond)
Willet	*Tringa semipalmata*	BCC	On site	Throughout
Marbled murrelet	*Brachyramphus marmoratus*	FT, CE	On site	West and N/central (Richmond)
Rhinoceros auklet	*Cerorhinca monocerata*	WL	On site	North and W, along shores
Cassin's auklet	*Ptychoramphus aleuticus*	SSC	Very close	North and W of along shores
Scripps' murrelet	*Synthliboramphus scrippsi*	CT, BCC	Very close	NW of site along shore
Tufted puffin			Very close	West along shore

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Laughing gull	*Leucophaeus atricilla*	WL	Very close	Presidio, West shore, Lake Merced
Franklin's gull	*Leucophaeus pipixcan*	BCC	Very close	West shore, Golden Gate Park, Lake Merced
Heermann's gull	*Larus heermanni*	BCC	On site	Throughout
Western gull	*Larus occidentalis*	BCC	On site	Throughout
California gull	*Larus californicus*	BCC, WL	On site	Throughout
California least tern	*Sternula antillarum browni*	FE, CE, CFP	Very close	North and Lake Merced
Black tern	*Chlidonias niger*	SSC2, BCC	Very close	Golden Gate Park, North and west aspects
Elegant tern	*Thalasseus elegans*	BCC, WL	On site	Throughout
Black skimmer	*Rynchops niger*	BCC, SSC3	On site	North shore
Common loon	*Gavia immer*	SSC	On site	Throughout
Brandt's cormorant	*Urile penicillatus*	BCC	On site	Throughout, mostly along North and west shores
Double-crested cormorant	*Phalacrocorax auritus*	WL	On site	Throughout
American white pelican	*Pelacanus erythrorhynchos*	SSC1	On site	Throughout, mostly North, central
Least bittern	*Ixobrychus exilis*	SSC2	Very close	Golden Gate Park, Lake Merced
White-faced ibis	*Plegadis chihi*	WL	On site	West side
Turkey vulture	*Cathartes aura*	BOP	On site	Throughout
Osprey	*Pandion haliaetus*	WL, BOP	On site	Throughout
White-tailed kite	*Elanus luecurus*	CFP, BOP	On site	Throughout
Golden eagle	*Aquila chrysaetos*	BGEPA, CFP, BOP, WL	On site	Throughout, mostly central
Northern harrier	*Circus cyaneus*	BCC, SSC3, BOP	On site	Throughout
Sharp-shinned hawk	*Accipiter striatus*	WL, BOP	On site	Throughout
Cooper's hawk	*Accipiter cooperii*	WL, BOP	On site	Throughout
American goshawk	*Accipiter atricapillus*	SSC2, BOP	On site	North

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Bald eagle	*Haliaeetus leucocephalus*	CE, BGEPA, BOP	On site	Throughout
Red-shouldered hawk	*Buteo lineatus*	BOP	On site	Throughout
Swainson's hawk	*Buteo swainsoni*	CT, BOP	On site	Throughout
Red-tailed hawk	*Buteo jamaicensis*	BOP	On site	Throughout
Ferruginous hawk	*Buteo regalis*	WL, BOP	On site	Throughout
Rough-legged hawk	*Buteo lagopus*	BOP	On site	Central
American barn owl	*Tyto furcata*	BOP	On site	Throughout
Northern spotted owl	*Strix occidentalis caurina*	FT, CT, BOP	In range	
Western screech-owl	*Megascops kennicotti*	BOP	Very close	Presidio, Golden Gate Park
Great horned owl	*Bubo virginianus*	BOP	On site	Throughout
Burrowing owl	*Athene cunicularia*	BCC, SSC2, BOP, CCE	On site	Throughout
Long-eared owl	*Asio otus*	BCC, SSC3, BOP	In region	
Short-eared owl	*Asia flammeus*	BCC, SSC3, BOP	On site	Central
Northern saw-whet owl	*Aegolius acadicus*	BOP	On site	North
Northern pygmy-owl	*Glaucidium gnoma*	BOP	Very close	Lake Merced
Lewis's woodpecker	*Melanerpes lewis*	BCC	On site	North and central
Nuttall's woodpecker	*Picoides nuttallii*	BCC	On site	Throughout
American kestrel	*Falco sparverius*	BOP	On site	Throughout
Merlin	*Falco columbarius*	WL, BOP	On site	Throughout
Peregrine falcon	*Falco peregrinus*	BOP	On site	Throughout
Prairie falcon	*Falco mexicanus*	WL, BOP	On site	Throughout
Olive-sided flycatcher	*Contopus cooperi*	BCC, SSC2	On site	Throughout
Willow flycatcher	*Empidonax trailii*	CE	On site	Throughout
Vermilion flycatcher	*Pyrocephalus rubinus*	SSC2	On site	North /central (Richmond)
Least Bell's vireo	*Vireo bellii pusillus*	FE, CE	In region	
Loggerhead shrike	*Lanius ludovicianus*	SSC2	Very close	Presidio, Lake Merced, Golden Gate Park, SE of site

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Yellow-billed magpie	*Pica nuttalli*	BCC	On site	Central/South
Oak titmouse	*Baeolophus inornatus*	BCC	On site	North and central
California horned lark	*Eremophila alpestris actia*	WL	On site	North and central
Bank swallow	*Riparia riparia*	CT	On site	Throughout
Purple martin	*Progne subis*	SSC2	On site	Throughout
Wrentit	*Chamaea fasciata*	BCC	On site	Throughout
California thrasher	*Toxostoma redivivum*	BCC	On site	N and central
Cassin's finch	*Haemorhous cassinii*	BCC	On site	N and central
Lawrence's goldfinch	*Spinus lawrencei*	BCC	On site	N and central
Grasshopper sparrow	*Ammodramus savannarum*	SSC2	On site	N and central
Black-chinned sparrow	*Spizella atrogularis*	BCC	In region	
Bell's sparrow	*Amphispiza b. belli*	WL	On site	South
Large-billed savannah sparrow	*Passerculus sandwichensis rostratus*	SSC2	In region	
Yellow-breasted chat	*Icteria virens*	SSC3	On site	Throughout
Yellow-headed blackbird	*Xanthocephalus xanthocephalus*	SSC3	On site	North and central
Bullock's oriole	*Icterus bullockii*	BCC	On site	Throughout
Tricolored blackbird	*Agelaius tricolor*	CT, BCC, SSC1	On site	Throughout
Lucy's warbler	*Leiothlypis luciae*	SSC3	On site	SW and North
Virginia's warbler	*Leiothlypis virginiae*	WL, BCC	On site	Throughout
San Francisco common yellowthroat	*Geothlypis trichas sinuosa*	SSC3, BCC	In range	
Prothonotary warbler	*Protonotaria citrea*	BCC	On site	Central and West
Prairie warbler	*Setophaga discolor*	BCC	On site	Central
Yellow warbler	*Setophaga petechia*	SSC2	On site	Throughout
Hepatic tanager	*Piranga flava*	WL	On site	Central/South
Summer tanager	*Piranga rubra*	SSC1	On site	Throughout
Little brown bat	*Myotis lucifugus*	WBWG: M	In region	
Yuma myotis	*Myotis yumanensis*	WBWG: LM	Very close	In golden gate park

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Long-eared myotis	*Myotis evotis*	WBWG: M	In region	
Fringed myotis	*Myotis thysanodes*	WBWG: H	In range	
Long-legged myotis	*Myotis volans*	WBWG: H	In range	
California myotis	*Myotis californicus*	WBWG:L	Very close	In golden gate park
Canyon bat	*Parastrellus hesperus*	WBWG: M	In range	
Big brown bat	*Episticus fuscus*	WBWG: L	Very close	In golden gate park
Silver-haired bat	*Lasionycteris noctivagans*	WBWG: M	On site	North
Hoary bat	*Lasiurus cinereus*	WBWG: M	Very close	In golden gate park
Western red bat	*Lasiurus blossevillii*	SSC, WBWG: H	Very close	In golden gate park
Townsend's big-eared bat	*Corynorhinus townsendii*	SSC, WBWG: H	In region	
Pallid bat	*Antrozous pallidus*	SSC, WBWG: H	In region	
Mexican free-tailed bat	*Tadarida brasiliensis*	WBWG: L	Very close	Golden Gate Park
San Francisco dusky-footed woodrat	*Neotoma fuscipes annectens*	SSC	In region	
Southern sea otter	*nhydra lutris nereis*	FT, CFP, SSC	In region	
Salt-marsh harvest mouse	*Reithrodontomys raviventris*	FE, CE, CFP	In region	
American badger	*Taxidea taxus*	SSC	Nearby	

[1] Listed on CDFW's Special Animals List (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406) as FT or FE = federal threatened or endangered; FC = federal candidate for listing; BGEPA = Bald and Golden Eagle Protection Act; CT or CE = California threatened or endangered; CCT or CCE = Candidate California threatened or endangered; CFP = California Fully Protected (California Fish and Game Code 3511); SSC = California Species of Special Concern, and SSC1, SSC2 and SSC3 = California Bird Species of Special Concern priorities 1, 2 and 3, respectively); WL = CDFW's Taxa to Watch List; WBWG = Western Bat Working Group with priority rankings, of low (L), moderate (M), and high (H); BCC = U.S. Fish and Wildlife Service's Bird of Conservation Concern (https://www.fws.gov/sites/default/files/documents/birds-of-conservation-concern-2021.pdf); and BOP = protected by Birds of Prey (California Fish and Game Code 3503.5, see https://wildlife.ca.gov/Conservation/Birds/Raptors).

By the time Loss et al. (2014) performed their effort to estimate annual USA bird-window fatalities, many more fatality monitoring studies had been reported or were underway. Loss et al. (2014) incorporated many more fatality rates based on scientific monitoring, and they were more careful about which fatality rates to include. However, they included estimates based on fatality monitoring by homeowners, which in one study were found to detect only 38% of the available window fatalities (Bracey et al. 2016). Loss et al. (2014) excluded all fatality records lacking a dead bird in hand, such as injured birds or feather or blood spots on windows. Loss et al.'s (2014) fatality metric was the number of fatalities per building (where in this context a building can include a house, low-rise, or high-rise structure), but they assumed that this metric was based on window collisions. Because most of the bird-window collision studies were limited to migration seasons, Loss et al. (2014) developed an admittedly assumption-laden correction factor for making annual estimates. Also, only 2 of the studies included adjustments for carcass persistence and searcher detection error, and it was unclear how and to what degree fatality rates were adjusted for these factors. Although Loss et al. (2014) attempted to account for some biases as well as for large sources of uncertainty mostly resulting from an opportunistic rather than systematic sampling data source, their estimated annual fatality rate across the USA was highly uncertain and vulnerable to multiple biases, most of which would have resulted in fatality estimates biased low.

In my review of bird-window collision monitoring, I found that the search radius around homes and buildings was very narrow, usually 2 meters. Based on my experience with bird collisions in other contexts, I would expect that a large portion of bird-window collision victims would end up farther than 2 m from the windows, especially when the windows are higher up on tall buildings. In my experience, searcher detection rates tend to be low for small birds deposited on ground with vegetation cover or woodchips or other types of organic matter. Also, vertebrate scavengers entrain on anthropogenic sources of mortality and quickly remove many of the carcasses, thereby preventing the fatality searcher from detecting these fatalities. Adjusting fatality rates for these factors – search radius bias, searcher detection error, and carcass persistence rates – would greatly increase nationwide estimates of bird-window collision fatalities.

Buildings can intercept many nocturnal migrants as well as birds flying in daylight. As mentioned above, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a four-story glass walkway at Washington State University (no adjustments attempted for undetected fatalities). Somerlot (2003) found 21 bird fatalities among 13 buildings on a university campus within only 61 days. Monitoring twice per week, Hager at al. (2008) found 215 bird fatalities of 48 species, or 55 birds/building/year, and at another site they found 142 bird fatalities of 37 species for 24 birds/building/year. Gelb and Delacretaz (2009) recorded 5,400 bird fatalities under buildings in New York City, based on a decade of monitoring only during migration periods, and some of the high-rises were associated with hundreds of fatalities each. Klem et al. (2009) monitored 73 building façades in New York City during 114 days of two migratory periods, tallying 549 collision victims, nearly 5 birds per day. Borden et al. (2010) surveyed a 1.8 km route 3 times per week during 12-month period and found 271 bird fatalities of 50 species. Parkins et al. (2015) found 35 bird fatalities of 16 species within only 45 days of monitoring under 4 building façades. From

24 days of survey over a 48-day span, Porter and Huang (2015) found 47 fatalities under 8 buildings on a university campus. Sabo et al. (2016) found 27 bird fatalities over 61 days of searches under 31 windows. In San Francisco, Kahle et al. (2016) found 355 collision victims within 1,762 days under a 5-story building. Ocampo-Peñuela et al. (2016) searched the perimeters of 6 buildings on a university campus, finding 86 fatalities after 63 days of surveys. One of these buildings produced 61 of the 86 fatalities, and another building with collision-deterrent glass caused only 2 of the fatalities, thereby indicating a wide range in impacts likely influenced by various factors. There is ample evidence available to support my prediction that the proposed project would result in many collision fatalities of birds.

Project Impact Prediction

By the time of these comments, I had reviewed and processed results of bird collision monitoring at 213 buildings and façades for which bird collisions per m^2 of glass per year could be calculated and averaged (Johnson and Hudson 1976, O'Connell 2001, Somerlot 2003, Hager et al. 2008, Borden et al. 2010, Hager et al. 2013, Porter and Huang 2015, Parkins et al. 2015, Kahle et al. 2016, Ocampo-Peñuela et al. 2016, Sabo et al. 2016, Barton et al. 2017, Gomez-Moreno et al. 2018, Schneider et al. 2018, Loss et al. 2019, Brown et al. 2020, City of Portland Bureau of Environmental Services and Portland Audubon 2020, Riding et al. 2020). These study results averaged 0.073 bird deaths per m^2 of glass per year (95% CI: 0.042-0.102). This average and its 95% confidence interval provide a robust basis for predicting fatality rates at a proposed new project.

The Addendum includes an increase of 4,000 residential units. The floorspace per residential unit of condominiums, townhouses and apartments among the projects I have reviewed as an expert have averaged 1,296.3 square feet per unit. The average square footage of the apartments that contributed to this average was consistent with the floorspace reported in the Addendum as an example 590-foot-tall apartment building in the project, which itself would average 949 sf per unit with 60,700 sf of retail space. I estimate the total square footage of 4,000 residential units would be 5,185,251 sf.

Among the 45 residential projects I have reviewed as an expert and for which I was able to measure the extent of structural glass on proposed building facades depicted in renderings provided in the environmental review documents, I measured an average 0.01872 (95% confidence interval: 0.00989–0.02754) m^2 per square foot of floorspace. This rate multiplied by the total square footage of 4,000 additional residential units would predict 97,060 (95% CI: 51,300–142,821) m^2 of additional structural glass on the facades of new buildings in the City. The mean window area multiplied against the mean collision mortality measured across North America predicts 7,095 (aggregate[1] 95% CI: 2,226–14,82) bird fatalities per year. More than seven thousand additional fatalities per

[1] What I mean by aggregate CI is that the lower bound estimate of the window area is multiplied by the lower bound estimate of collision mortality, and the upper bound estimate of the window area is multiplied by the upper bound estimate of collision mortality.

year above the level that would be expected under the 2022 plan would be a substantial number, and it should easily qualify as a highly significant impact.

Nearly all predicted deaths would be of birds protected under the Migratory Bird Treaty Act and under the California Migratory Bird Protection Act, thus causing significant impacts. Given the predicted level of bird-window collision mortality, it is my opinion that the proposed project would result in potentially significant adverse biological impacts, including the unmitigated take of aerial habitats of birds, bats and other volant wildlife. Not only would the project take habitat of rare and sensitive species of birds, but it would transform the building's airspace into a lethal collision trap to birds.

SPATIAL DISTRIBUTION OF PREDICTED AVIAN COLLISION MORTALITY

San Francisco is situated within the Pacific Flyway, which is one of the most intensely used bird migration pathways in the world. It is also known that birds migrate along the coast and across Hawk Hill and the Marin Headlands, many headed to or from the Altamont Pass where I spent thousands of hours observing migrants during both day and night over about 20 years. Between Hawk Hill and the Altamont Pass is San Francisco, which must be visited by many thousands of migrating birds. Knowing which species of birds and how many birds move across San Francisco, and knowing specific flight paths that are disproportionately used by season would be useful for predicting where increases in building heights would pose greater risks to birds. Unfortunately, the data on bird movement through San Francisco are sparse.

There *are* data on bird species richness. Golden Gate Audubon Society ("GGAS") (2020), tallied 47 species of birds on Mount Sutro Open Space Reserve in about 54 hours of surveys between 16 March and 29 December 2019. On the same Reserve on 20 August 2020, I detected 23 species of birds over a much shorter time, but a model I fit to my data predicts that I would have detected the same number of bird species as GGAS (2020) had I surveyed for 11 hours and 40 minutes, and that I would have detected 117 species of birds had I surveyed for 54 hours (Figure 1).

I repeated my survey on Mount Sutro Open Space Reserve on 16 July 2021, and I implemented the same survey methods such as start time, duration, and survey route. The second survey yielded even more species detections and at a faster rate (red circles in Figure 2). Between both surveys I detected 37 species of birds, but adding the results of GGAS (2021) brings the total number of bird species to 71. With additional surveys, this number would surely increase. The evidence is that many birds find and use aerohabitat in San Francisco.

Kahle et al. (2016) detected 40 species of birds at the California Academy of Sciences building in Golden Gatee Park (Table 2). More importantly, members of 34 (85%) of these species were also recorded as window collision fatalities, and members of 37 (93%) of these species appear in the scientific literature as window collision fatalities. Killed disproportionately relative to their observed abundances were special-status species such as Allen's hummingbird and yellow warbler (Figure 3). Both these species are found in abundance in San Francisco (Photo 1).

Figure 1. *Cumulative number of bird species detected as a power function of the number of minutes devoted to the survey. The model explained 98% of the variation, with a root mean square error of 17.71. Had I been able to commit more time to the survey, I am confident a different model would have better fit the resulting data – a model more expressive of an asymptote.*

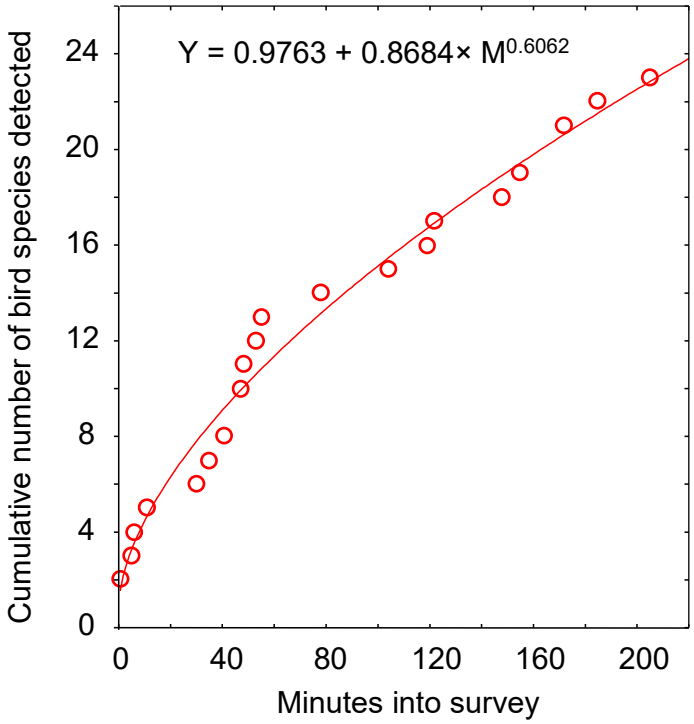

Figure 2. *Actual and predicted relationships between the number of vertebrate wildlife species (all but 2 were birds) detected and the elapsed survey time based on my visual-scan surveys on 20 August 2020 and 16 July 2021.*

$$Y_{2020} = \frac{1}{0.001559 + 0.935847(X+1)^{-0.580731}}$$

$$Y_{2021} = \frac{1}{0.0016586 + 0.459981(X+1)^{-0.543857}}$$

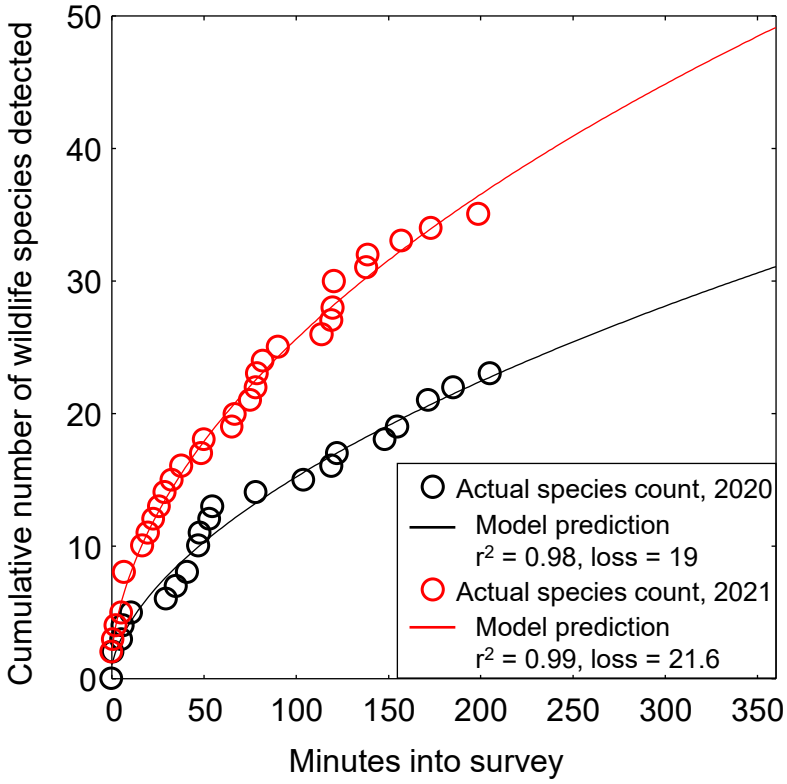

Table 2. *Species observed on site or reported as window-collision victims at the California Academy of Sciences (CAS) buildings (Kahle et al. 2016).*

Species	Scientific name	Status[1]	Number counted at CAS study		Known window deaths in North America
			As window deaths	Alive in survey plots	
Western gull	*Larus occidentalis*	BCC		4	
Red-tailed hawk	*Buteo jamaicensis*	BOP		1	Yes
Red-shouldered hawk	*Buteo lineatus*	BOP		1	Yes
Mourning dove	*Zenaida macroura*		6	3	Yes
Great-horned owl	*Bubo virginianus*	BOP		1	Yes
Anna's hummingbird	*Calypte anna*		131	256	Yes
Allen's hummingbird	*Selasphorus sasin*	BCC	37	29	Yes
Costa's hummingbird	*Calypte costae*	BCC	1	0	Yes
Rufous hummingbird	*Selasphorus rufus*	BCC	4	0	Yes
Nuttall's woodpecker	*Picoides nuttallii*	BCC		13	
Pacific-slope flycatcher	*Empidonax difficilis*		1	5	Yes
Black phoebe	*Sayornis nigricans*		3	34	Yes
Chestnut-backed chickadee	*Poecile rufescens*		1	203	Yes
Bushtit	*Psaltriparus minimus*		1	399	Yes
Brown creeper	*Certhia americana*		1	52	Yes
Pygmy nuthatch	*Sitta pygmaea*		1	242	Yes
Swainson's thrush	*Catharus ustulatus*		1	1	Yes
Hermit thrush	*Catharus guttatus*		8	82	Yes
American robin	*Turdus vulvaris*		3	389	Yes
Warbling vireo	*Vireo gilvus*		1	5	Yes
Yellow-rumped warbler	*Setophaga coronata*		7	92	Yes
Orange-crowned warbler	*Oreothlypis celata*		2	29	Yes
Townsend's warbler	*Setophaga townsendi*		3	101	Yes
Wilson's warbler	*Cardellina pusilla*		3	11	Yes
Yellow warbler	*Setophaga petechia*	SSC2, BCC	7	18	Yes
San Francisco common yellowthroat	*Geothlypis trichas sinuosa*	SSC3, BCC	3	0	Yes
Song sparrow	*Melospiza melodia*		5	435	Yes
Golden-crowned sparrow	*Zonotrichia atricapilla*		3	230	Yes
White-crowned sparrow	*Zonotrichia leucophrys*		1	249	Yes
Savannah sparrow	*Passerculus sandwichensis*		2	0	Yes
Lincoln's sparrow	*Melospiza lincolnii*		3	35	Yes
Fox sparrow	*Passerella iliaca*		6	152	Yes

Species	Scientific name	Status[1]	Number counted at CAS study		Known window deaths in North America
			As window deaths	Alive in survey plots	
Dark-eyed junco	*Junco hyemalis*		22	510	Yes
California towhee	*Melozone crissalis*		1	92	Yes
Brown-headed cowbird	*Molothrus ater*		1	39	Yes
Red-winged blackbird	*Agelaius phoeniceus*		1	261	Yes
Brewer's blackbird	*Euphagus cyanocephalus*		25	1027	Yes
Tricolored blackbird	*Agelaius tricolor*	CT, BCC		15	
House finch	*Haemorhous mexicanus*		5	213	Yes
Lesser goldfinch	*Spinus psaltria*		1	44	Yes

[1] Listed as BCC = U.S. Fish and Wildlife Service Bird Species of Conservation Concern, CT = California threatened, BOP = California Fish and Game Code 3503.5 (Birds of Prey), and SSC1, SSC2 and SSC3 = California Bird Species of Special Concern priorities 1, 2 and 3, respectively.

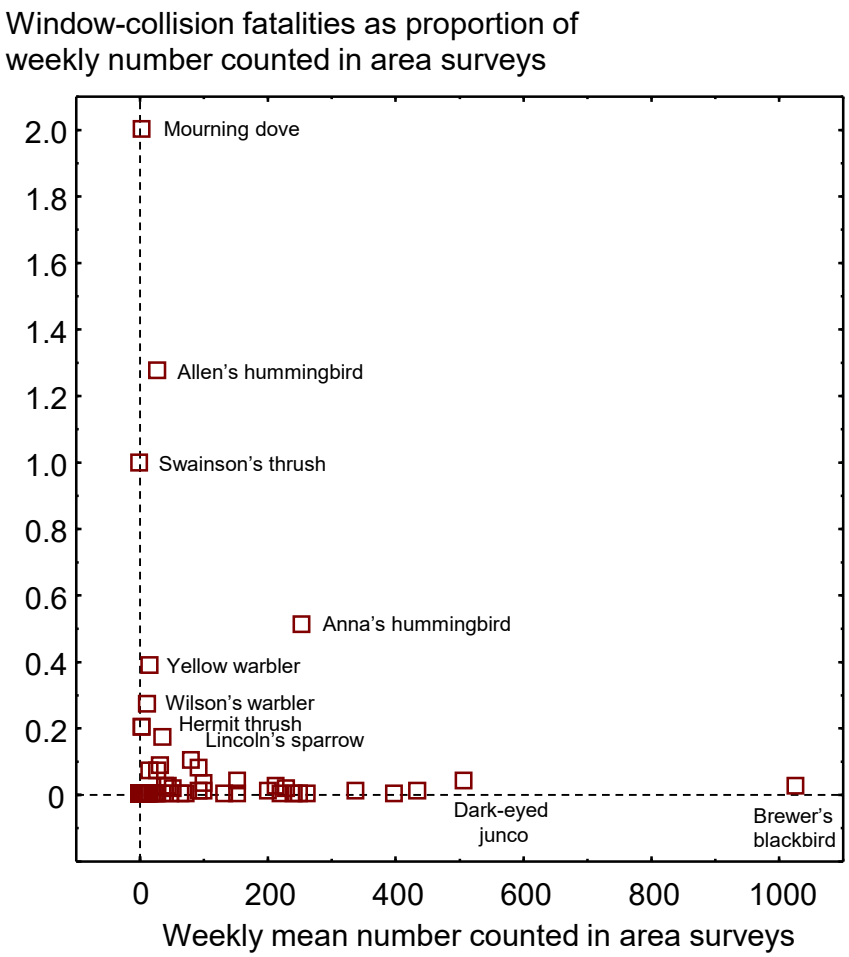

Figure 3. *Window collision fatalities as a proportion of those observed in visual-scan surveys at the California Academy of Sciences building (data from Kahle et al. 2016).*

Photo 1. *Allen's hummingbird in Mount Sutro Open Space Reserve, 16 July 2021. As found at the nearby California Academy of Sciences Building, this species is highly vulnerable to window collision mortality (Kahle et al. 2016).*

What is needed is a study of bird movement through San Francisco. Needed are data on species occurrences, numbers of birds, heights above ground, flight direction, specific behaviors and timing of flights across the City. These same types of data were collected in the nearby Altamont Pass Wind Resource Area to acquire an understanding of bird flight traffic for the purposed of guiding the sitings of new wind turbines as part of repowering (Smallwood 2017, Smallwood et al. 2017). The data could be acquired by performing periodic surveys from stations established systematically or randomly across the City, covering all times of day and night (using thermal imaging cameras) and lasting at least one year to characterize seasonality of bird movement. Based on such data, the City could more carefully plan the vertical and lateral outlay of new buildings to minimize the encounter frequencies of birds with buildings. This is important because the existing Bird-Safe Building Guidelines can accomplish only so much, and the efficacy of these Guidelines remains unmeasured and unknown. Therefore, what is also needed is a program to measure the efficacy of the Guidelines by designing an experiment to search for and count bird-window collision victims along with the implementation of carcass detection trials. The San Francisco guidelines should have also covered scientific monitoring of impacts as well as compensatory mitigation for impacts that could not be avoided, minimized or reduced. Until these types of bird movement data are in hand, the City can only speculate as to the magnitude of bird-window collision mortality and whether the mortality can be minimized or reduced via Bird-Safe Building Guidelines.

In the face of such a large increase in the number of residential units, as well as a major shift in the lateral and vertical layout of 54,000 residential units, another need is for an update in the Bird-Safe Building Guidelines (San Francisco Planning Department 2011). Much has been learned about causal factors and mitigation solutions (e.g., Sheppard and Phillips 2015). The American Bird Conservancy (ABC) produced an excellent set of

guidelines recommending actions to: (1) Minimize use of glass; (2) Placing glass behind some type of screening (grilles, shutters, exterior shades); (3) Using glass with inherent properties to reduce collisions, such as patterns, window films, decals or tape; and (4) Turning off lights during migration seasons (Sheppard and Phillips 2015).

New research results inform of the efficacy of marking windows. Whereas Klem (1990) found no deterrent effect from decals on windows, Johnson and Hudson (1976) reported a fatality reduction of about 69% after placing decals on windows. In an experiment of opportunity, Ocampo-Peñuela et al. (2016) found only 2 of 86 fatalities at one of 6 buildings – the only building with windows treated with a bird deterrent film. At the building with fritted glass, bird collisions were 82% lower than at other buildings with untreated windows. Kahle et al. (2016) added external window shades to some windowed façades to reduce fatalities 82% and 95%. Brown et al. (2020) reported an 84% lower collision probability among fritted glass windows and windows treated with ORNILUX R UV. City of Portland Bureau of Environmental Services and Portland Audubon (2020) reduced bird collision fatalities 94% by affixing marked Solyx window film to existing glass panels of Portland's Columbia Building. Many external and internal glass markers have been tested experimentally, some showing no effect and some showing strong deterrent effects (Klem 1989, 1990, 2009, 2011; Klem and Saenger 2013; Rössler et al. 2015).

Van Doren et al. (2021) found that nocturnal migrants contributed most of the collision fatalities in their study, and the largest predictors of fatalities were peak migration and lit windows. Van Doren et al. (2021) predicted that a light-out mitigation measure could reduce bird-window collision mortality by 60%.

Monitoring and the use of compensatory mitigation should be incorporated at any new building project because the measures recommended in the available guidelines remain of uncertain efficacy, and even if these measures are effective, they will not reduce collision fatalities to zero. The only way to assess mitigation efficacy and to quantify post-construction fatalities is to monitor the project for fatalities.

The Addendum (p. 49) concludes, "In summary, the proposed rezoning program would not result in new significant biological resources impacts that were not previously identified in the FEIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures or changes to existing mitigation measures are required." However, the FEIR did not identify the loss of aerohabitat of birds and bats as any sort of project impact, and neither does the Addendum. Furthermore, the FEIR did not identify as an impact my predicted mean mortality of 7,095 birds per year just from the additional 4,000 residential units, and an upper bound CI prediction of 14,082 birds per year.

Thank you for your consideration,

Shawn Smallwood, Ph.D.

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Curriculum Vitae

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Born May 3, 1963 in
Sacramento, California.
Married, father of two.

Ecologist

Expertise

- Finding solutions to controversial problems related to wildlife interactions with human industry, infrastructure, and activities;
- Wildlife monitoring and field study using GPS, thermal imaging, behavior surveys;
- Using systems analysis and experimental design principles to identify meaningful ecological patterns that inform management decisions.

Education

Ph.D. Ecology, University of California, Davis. September 1990.
M.S. Ecology, University of California, Davis. June 1987.
B.S. Anthropology, University of California, Davis. June 1985.
Corcoran High School, Corcoran, California. June 1981.

Experience

- 762 professional reports, including:
- 90 peer reviewed publications
- 24 in non-reviewed proceedings
- 646 reports, declarations, posters and book reviews
- 8 in mass media outlets
- 92 public presentations of research results

Editing for scientific journals: Guest Editor, *Wildlife Society Bulletin*, 2012-2013, of invited papers representing international views on the impacts of wind energy on wildlife and how to mitigate the impacts. Associate Editor, *Journal of Wildlife Management*, March 2004 to 30 June 2007. Editorial Board Member, *Environmental Management*, 10/1999 to 8/2004. Associate Editor, *Biological Conservation*, 9/1994 to 9/1995.

Member, Alameda County Scientific Review Committee (SRC), August 2006 to April 2011. The five-member committee investigated causes of bird and bat collisions in the Altamont Pass Wind Resource Area, and recommended mitigation and monitoring measures. The SRC reviewed the science underlying the Alameda County Avian Protection Program, and advised

the County on how to reduce wildlife fatalities.

Consulting Ecologist, 2004-2007, California Energy Commission (CEC). Provided consulting services as needed to the CEC on renewable energy impacts, monitoring and research, and produced several reports. Also collaborated with Lawrence-Livermore National Lab on research to understand and reduce wind turbine impacts on wildlife.

Consulting Ecologist, 1999-2013, U.S. Navy. Performed endangered species surveys, hazardous waste site monitoring, and habitat restoration for the endangered San Joaquin kangaroo rat, California tiger salamander, California red-legged frog, California clapper rail, western burrowing owl, salt marsh harvest mouse, and other species at Naval Air Station Lemoore; Naval Weapons Station, Seal Beach, Detachment Concord; Naval Security Group Activity, Skaggs Island; National Radio Transmitter Facility, Dixon; and, Naval Outlying Landing Field Imperial Beach.

Part-time Lecturer, 1998-2005, California State University, Sacramento. Instructed Mammalogy, Behavioral Ecology, and Ornithology Lab, Contemporary Environmental Issues, Natural Resources Conservation.

Senior Ecologist, 1999-2005, BioResource Consultants. Designed and implemented research and monitoring studies related to avian fatalities at wind turbines, avian electrocutions on electric distribution poles across California, and avian fatalities at transmission lines.

Chairman, Conservation Affairs Committee, The Wildlife Society--Western Section, 1999-2001. Prepared position statements and led efforts directed toward conservation issues, including travel to Washington, D.C. to lobby Congress for more wildlife conservation funding.

Systems Ecologist, 1995-2000, Institute for Sustainable Development. Headed ISD's program on integrated resources management. Developed indicators of ecological integrity for large areas, using remotely sensed data, local community involvement and GIS.

Associate, 1997-1998, Department of Agronomy and Range Science, University of California, Davis. Worked with Shu Geng and Mingua Zhang on several studies related to wildlife interactions with agriculture and patterns of fertilizer and pesticide residues in groundwater across a large landscape.

Lead Scientist, 1996-1999, National Endangered Species Network. Informed academic scientists and environmental activists about emerging issues regarding the Endangered Species Act and other environmental laws. Testified at public hearings on endangered species issues.

Ecologist, 1997-1998, Western Foundation of Vertebrate Zoology. Conducted field research to determine the impact of past mercury mining on the status of California red-legged frogs in Santa Clara County, California.

Senior Systems Ecologist, 1994-1995, EIP Associates, Sacramento, California. Provided consulting services in environmental planning, and quantitative assessment of land units for their conservation and restoration opportunities basedon ecological resource requirements of 29 special-status species. Developed ecological indicators for prioritizing areas within Yolo County

to receive mitigation funds for habitat easements and restoration.

Post-Graduate Researcher, 1990-1994, Department of Agronomy and Range Science, *U.C. Davis*. Under Dr. Shu Geng's mentorship, studied landscape and management effects on temporal and spatial patterns of abundance among pocket gophers and species of Falconiformes and Carnivora in the Sacramento Valley. Managed and analyzed a data base of energy use in California agriculture. Assisted with landscape (GIS) study of groundwater contamination across Tulare County, California.

Work experience in graduate school: Co-taught Conservation Biology with Dr. Christine Schonewald, 1991 & 1993, UC Davis Graduate Group in Ecology; Reader for Dr. Richard Coss's course on Psychobiology in 1990, UC Davis Department of Psychology; Research Assistant to Dr. Walter E. Howard, 1988-1990, UC Davis Department of Wildlife and Fisheries Biology, testing durable baits for pocket gopher management in forest clearcuts; Research Assistant to Dr. Terrell P. Salmon, 1987-1988, UC Wildlife Extension, Department of Wildlife and Fisheries Biology, developing empirical models of mammal and bird invasions in North America, and a rating system for priority research and control of exotic species based on economic, environmental and human health hazards in California. Student Assistant to Dr. E. Lee Fitzhugh, 1985-1987, UC Cooperative Extension, Department of Wildlife and Fisheries Biology, developing and implementing statewide mountain lion track count for long-term monitoring.

Fulbright Research Fellow, Indonesia, 1988. Tested use of new sampling methods for numerical monitoring of Sumatran tiger and six other species of endemic felids, and evaluated methods used by other researchers.

Projects

Repowering wind energy projects through careful siting of new wind turbines using map-based collision hazard models to minimize impacts to volant wildlife. Funded by wind companies (principally NextEra Renewable Energy, Inc.), California Energy Commission and East Bay Regional Park District, I have collaborated with a GIS analyst and managed a crew of five field biologists performing golden eagle behavior surveys and nocturnal surveys on bats and owls. The goal is to quantify flight patterns for development of predictive models to more carefully site new wind turbines in repowering projects. Focused behavior surveys began May 2012 and continue. Collision hazard models have been prepared for seven wind projects, three of which were built. Planning for additional repowering projects is underway.

Test avian safety of new mixer-ejector wind turbine (MEWT). Designed and implemented a before-after, control-impact experimental design to test the avian safety of a new, shrouded wind turbine developed by Ogin Inc. (formerly known as FloDesign Wind Turbine Corporation). Supported by a $718,000 grant from the California Energy Commission's Public Interest Energy Research program and a 20% match share contribution from Ogin, I managed a crew of seven field biologists who performed periodic fatality searches and behavior surveys, carcass detection trials, nocturnal behavior surveys using a thermal camera, and spatial analyses with the collaboration of a GIS analyst. Field work began 1 April 2012 and ended 30 March 2015 without Ogin installing its MEWTs, but we still achieved multiple important scientific advances.

Reduce avian mortality due to wind turbines at Altamont Pass. Studied wildlife impacts caused by 5,400 wind turbines at the world's most notorious wind resource area. Studied how impacts are perceived by monitoring and how they are affected by terrain, wind patterns, food resources, range management practices, wind turbine operations, seasonal patterns, population cycles, infrastructure management such as electric distribution, animal behavior and social interactions.

Reduce avian mortality on electric distribution poles. Directed research toward reducing bird electrocutions on electric distribution poles, 2000-2007. Oversaw 5 founds of fatality searches at 10,000 poles from Orange County to Glenn County, California, and produced two large reports.

Cook *et al*. v. Rockwell International *et al*., No. 90-K-181 (D. Colorado). Provided expert testimony on the role of burrowing animals in affecting the fate of buried and surface-deposited radioactive and hazardous chemical wastes at the Rocky Flats Plant, Colorado. Provided expert reports based on four site visits and an extensive document review of burrowing animals. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals. I testified in federal court in November 2005, and my clients were subsequently awarded a $553,000,000 judgment by a jury. After appeals the award was increased to two billion dollars.

Hanford Nuclear Reservation Litigation. Provided expert testimony on the role of burrowing animals in affecting the fate of buried radioactive wastes at the Hanford Nuclear Reservation, Washington. Provided three expert reports based on three site visits and extensive document review. Predicted and verified a certain population density of pocket gophers on buried waste structures, as well as incidence of radionuclide contamination in body tissue. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals.

Expert testimony and declarations on proposed residential and commercial developments, gas-fired power plants, wind, solar and geothermal projects, water transfers and water transfer delivery systems, endangered species recovery plans, Habitat Conservation Plans and Natural Communities Conservation Programs. Testified before multiple government agencies, Tribunals, Boards of Supervisors and City Councils, and participated with press conferences and depositions. Prepared expert witness reports and court declarations, which are summarized under Reports (below).

Protocol-level surveys for special-status species. Used California Department of Fish and Wildlife and US Fish and Wildlife Service protocols to search for California red-legged frog, California tiger salamander, arroyo southwestern toad, blunt-nosed leopard lizard, western pond turtle, giant kangaroo rat, San Joaquin kangaroo rat, San Joaquin kit fox, western burrowing owl, Swainson's hawk, Valley elderberry longhorn beetle and other special-status species.

Conservation of San Joaquin kangaroo rat. Performed research to identify factors responsible for the decline of this endangered species at Lemoore Naval Air Station, 2000-2013, and implemented habitat enhancements designed to reverse the trend and expand the population.

Impact of West Nile Virus on yellow-billed magpies. Funded by Sacramento-Yolo Mosquito and Vector Control District, 2005-2008, compared survey results pre- and post-West Nile Virus epidemic for multiple bird species in the Sacramento Valley, particularly on yellow-billed magpie and American crow due to susceptibility to WNV.

Workshops on HCPs. Assisted Dr. Michael Morrison with organizing and conducting a 2-day workshop on Habitat Conservation Plans, sponsored by Southern California Edison, and another 1-day workshop sponsored by PG&E. These Workshops were attended by academics, attorneys, and consultants with HCP experience. We guest-edited a Proceedings published in Environmental Management.

Mapping of biological resources along Highways 101, 46 and 41. Used GPS and GIS to delineate vegetation complexes and locations of special-status species along 26 miles of highway in San Luis Obispo County, 14 miles of highway and roadway in Monterey County, and in a large area north of Fresno, including within reclaimed gravel mining pits.

GPS mapping and monitoring at restoration sites and at Caltrans mitigation sites. Monitored the success of elderberry shrubs at one location, the success of willows at another location, and the response of wildlife to the succession of vegetation at both sites. Also used GPS to monitor the response of fossorial animals to yellow star-thistle eradication and natural grassland restoration efforts at Bear Valley in Colusa County and at the decommissioned Mather Air Force Base in Sacramento County.

Mercury effects on Red-legged Frog. Assisted Dr. Michael Morrison and US Fish and Wildlife Service in assessing the possible impacts of historical mercury mining on the federally listed California red-legged frog in Santa Clara County. Also measured habitat variables in streams.

Opposition to proposed No Surprises rule. Wrote a white paper and summary letter explaining scientific grounds for opposing the incidental take permit (ITP) rules providing ITP applicants and holders with general assurances they will be free of compliance with the Endangered Species Act once they adhere to the terms of a "properly functioning HCP." Submitted 188 signatures of scientists and environmental professionals concerned about No Surprises rule US Fish and Wildlife Service, National Marine Fisheries Service, all US Senators.

Natomas Basin Habitat Conservation Plan alternative. Designed narrow channel marsh to increase the likelihood of survival and recovery in the wild of giant garter snake, Swainson's hawk and Valley Elderberry Longhorn Beetle. The design included replication and interspersion of treatments for experimental testing of critical habitat elements. I provided a report to Northern Territories, Inc.

Assessments of agricultural production system and environmental technology transfer to China. Twice visited China and interviewed scientists, industrialists, agriculturalists, and the Directors of the Chinese Environmental Protection Agency and the Department of Agriculture to assess the need and possible pathways for environmental clean-up technologies and trade opportunities between the US and China.

Yolo County Habitat Conservation Plan. Conducted landscape ecology study of Yolo County to spatially prioritize allocation of mitigation efforts to improve ecosystem functionality within the County from the perspective of 29 special-status species of wildlife and plants. Used a hierarchically structured indicators approach to apply principles of landscape and ecosystem ecology, conservation biology, and local values in rating land units. Derived GIS maps to help guide the conservation area design, and then developed implementation strategies.

Mountain lion track count. Developed and conducted a carnivore monitoring program throughout California since 1985. Species counted include mountain lion, bobcat, black bear, coyote, red and gray fox, raccoon, striped skunk, badger, and black-tailed deer. Vegetation and land use are also monitored. Track survey transect was established on dusty, dirt roads within randomly selected quadrats.

Sumatran tiger and other felids. Upon award of Fulbright Research Fellowship, I designed and initiated track counts for seven species of wild cats in Sumatra, including Sumatran tiger, fishing cat, and golden cat. Spent four months on Sumatra and Java in 1988, and learned Bahasa Indonesia, the official Indonesian language.

Wildlife in agriculture. Beginning as post-graduate research, I studied pocket gophers and other wildlife in 40 alfalfa fields throughout the Sacramento Valley, and I surveyed for wildlife along a 200 mile road transect since 1989 with a hiatus of 1996-2004. The data are analyzed using GIS and methods from landscape ecology, and the results published and presented orally to farming groups in California and elsewhere. I also conducted the first study of wildlife in cover crops used on vineyards and orchards.

Agricultural energy use and Tulare County groundwater study. Developed and analyzed a data base of energy use in California agriculture, and collaborated on a landscape (GIS) study of groundwater contamination across Tulare County, California.

Pocket gopher damage in forest clear-cuts. Developed gopher sampling methods and tested various poison baits and baiting regimes in the largest-ever field study of pocket gopher management in forest plantations, involving 68 research plots in 55 clear-cuts among 6 National Forests in northern California.

Risk assessment of exotic species in North America. Developed empirical models of mammal and bird species invasions in North America, as well as a rating system for assigning priority research and control to exotic species in California, based on economic, environmental, and human health hazards.

Peer Reviewed Publications

Smallwood, K. S. 2022. Utility-scale solar impacts to volant wildlife. Journal of Wildlife Management: e22216. https://doi.org/10.1002/jwmg.22216

Smallwood, K. S., and N. L. Smallwood. 2021. Breeding Density and Collision Mortality of Loggerhead Shrike (*Lanius ludovicianus*) in the Altamont Pass Wind Resource Area. Diversity 13, 540. https://doi.org/10.3390/d13110540.

Smallwood, K. S. 2020. USA wind energy-caused bat fatalities increase with shorter fatality search intervals. Diversity 12(98); https://doi.org/10.3390/d12030098

Smallwood, K. S., D. A. Bell, and S. Standish. 2020. Dogs detect larger wind energy impacts on bats and birds. Journal of Wildlife Management 84:852-864. DOI: 10.1002/jwmg.21863.

Smallwood, K. S., and D. A. Bell. 2020. Relating bat passage rates to wind turbine fatalities.

Diversity 12(84); doi:10.3390/d12020084.

Smallwood, K. S., and D. A. Bell. 2020. Effects of wind turbine curtailment on bird and bat fatalities. Journal of Wildlife Management 84:684-696. DOI: 10.1002/jwmg.21844

Kitano, M., M. Ino, K. S. Smallwood, and S. Shiraki. 2020. Seasonal difference in carcass persistence rates at wind farms with snow, Hokkaido, Japan. Ornithological Science 19: 63 – 71.

Smallwood, K. S. and M. L. Morrison. 2018. Nest-site selection in a high-density colony of burrowing owls. Journal of Raptor Research 52:454-470.

Smallwood, K. S., D. A. Bell, E. L. Walther, E. Leyvas, S. Standish, J. Mount, B. Karas. 2018. Estimating wind turbine fatalities using integrated detection trials. Journal of Wildlife Management 82:1169-1184.

Smallwood, K. S. 2017. Long search intervals under-estimate bird and bat fatalities caused by wind turbines. Wildlife Society Bulletin 41:224-230.

Smallwood, K. S. 2017. The challenges of addressing wildlife impacts when repowering wind energy projects. Pages 175-187 in Köppel, J., Editor, Wind Energy and Wildlife Impacts: Proceedings from the CWW2015 Conference. Springer. Cham, Switzerland.

May, R., Gill, A. B., Köppel, J. Langston, R. H.W., Reichenbach, M., Scheidat, M., Smallwood, S., Voigt, C. C., Hüppop, O., and Portman, M. 2017. Future research directions to reconcile wind turbine–wildlife interactions. Pages 255-276 in Köppel, J., Editor, Wind Energy and Wildlife Impacts: Proceedings from the CWW2015 Conference. Springer. Cham, Switzerland.

Smallwood, K. S. 2017. Monitoring birds. M. Perrow, Ed., Wildlife and Wind Farms - Conflicts and Solutions, Volume 2. Pelagic Publishing, Exeter, United Kingdom. www.bit.ly/2v3cR9Q

Smallwood, K. S., L. Neher, and D. A. Bell. 2017. Turbine siting for raptors: an example from Repowering of the Altamont Pass Wind Resource Area. M. Perrow, Ed., Wildlife and Wind Farms - Conflicts and Solutions, Volume 2. Pelagic Publishing, Exeter, United Kingdom. www.bit.ly/2v3cR9Q

Johnson, D. H., S. R. Loss, K. S. Smallwood, W. P. Erickson. 2016. Avian fatalities at wind energy facilities in North America: A comparison of recent approaches. Human–Wildlife Interactions 10(1):7-18.

Sadar, M. J., D. S.-M. Guzman, A. Mete, J. Foley, N. Stephenson, K. H. Rogers, C. Grosset, K. S. Smallwood, J. Shipman, A. Wells, S. D. White, D. A. Bell, and M. G. Hawkins. 2015. Mange Caused by a novel Micnemidocoptes mite in a Golden Eagle (*Aquila chrysaetos*). Journal of Avian Medicine and Surgery 29(3):231-237.

Smallwood, K. S. 2015. Habitat fragmentation and corridors. Pages 84-101 in M. L. Morrison and H. A. Mathewson, Eds., Wildlife habitat conservation: concepts, challenges, and solutions. John Hopkins University Press, Baltimore, Maryland, USA.

EXHIBIT D

FASTCAST

Deborah Holley

Cc/ Richard Drurey

December 1, 2025

PRELIMINARY SHADOW ANALYSIS: **PROPOSED FAMILY ZONING 2025**, JOE DIMAGGIO PLAYGROUND, SAN FRANCISCO

Fastcast is hereby submitting the results of a **programmatic shadow analysis** prepared for the proposed **Family Zoning Plan**. This analysis is intended to quantify the **generalized potential change in shadow on Joe DiMaggio Playground** under a scenario in which the proposed height increases on surrounding parcels are fully utilized.

As part of the methodology, **City building footprint data** was used to define both the **existing zoning height extrusions** and the **Family Zoning Plan height extrusions** using the **same building footprints**. In this area, the **existing zoning envelope** (**generally 40 feet in height**) is treated as an **existing shadow-casting condition**, and the Family Zoning scenario adds only the **incremental height above this existing zoning envelope**. The **proposed shadows are therefore based solely on the height increase introduced by the Family Zoning Plan**, and **net new shadow** on Joe DiMaggio Playground is calculated only for this **incremental zoning height increase**.

The analysis applies **methodologies and data models consistent with San Francisco Planning Department and Planning Code Section 295 (“Shadow Ordinance”) standards and procedures**, as outlined in the July 2014 memorandum *“Shadow Analysis Procedures and Scope Requirements”* and as refined by subsequent written directives issued by the San Francisco Planning Department.

I. INTRODUCTION

This memorandum documents **preliminary quantitative shadow results** for **Joe DiMaggio Playground** associated with proposed height increases under the **San Francisco Family Zoning Plan** (**FZP**) in the North Beach area.

The purpose is to:

1. Summarize the **Family Zoning Plan objectives**,
2. Describe the **objective of the shadow analysis** for Joe DiMaggio Playground, and
3. Present a **neutral, scientific summary** of the **net new shadow** on the playground and the **times of day/season** when this potential shadow increase overlaps with typical playground activities.

No conclusions are offered regarding policy, compliance, or adequacy; this memo is limited to **description and quantification**.

II. FAMILY ZONING PLAN – CONTEXT & OBJECTIVES

According to the **Family Zoning Plan "Five Fast Facts"** document:

- The Plan is intended to create capacity for **over 36,000 homes** on San Francisco's north and west sides.
- In most areas, existing building heights remain **40 feet** (**approximately four stories**).
- The Plan allows **two to four additional stories** in select locations, mainly **near shopping, transit, and on major streets**, with high-rise buildings permitted only in limited areas.
- The Plan uses a **form-based approach**, regulating height, bulk, and setbacks, and is paired with **objective design standards**.
- The stated goals include meeting state housing requirements, maintaining local control over land use decisions, and strengthening tenant protections by directing growth toward underused and vacant sites.

Within this framework, the North Beach area surrounding **Joe DiMaggio Playground** is identified for **increased maximum building heights**, which in turn has the potential to increase shadow on the playground.

III. OBJECTIVE OF THE SHADOW ANALYSIS

The objective of the shadow analysis is to **quantify net new shadow** that could occur on **Joe DiMaggio Playground** as a result of the **proposed Family Zoning height increases**, using standard methods applied in San Francisco shadow studies.

Specifically, the analysis aims to:

1. Measure **annual shadow load** on Joe DiMaggio Playground under:
    - Existing conditions, and
    - A scenario with Family Zoning Plan height increases.
2. Determine:
    - **Net new annual shadow** (in square foot hours, sfh),
    - **Percent of available sunlight time** affected,
    - **Maximum area of net new shadow** and **percentage of the playground covered**, and
    - **Dates, times of day, and seasons** when net new shadow occurs.

These results are summarized in the City's **"PROPOSED FAMILY ZONING HEIGHT INCREASE – JOE DIMAGGIO ANNUAL SHADOW LOADS / SQUARE FOOT HOURS (sfh)"** sheet, which is the primary quantitative source referenced here.

FASTCAST

IV. QUANTITATIVE SHADOW RESULTS – JOE DIMAGGIO PLAYGROUND

All values below are taken directly from the **Joe DiMaggio Playground shadow summary** unless otherwise noted. Note: Existing shadow is based on Data SF Building Footprints : https://data.sfgov.org/Geographic-Locations-and-Boundaries/Building-Footprints/ynuv-fyni/about_data and Zoning heights derived from Proposed zoning interactive map: https://experience.arcgis.com/experience/6e0e399f9c82456dbda233eacebc433d/

PROPOSED FAMILY ZONING HEIGHT INCREASE JOE DIMAGGIO ANNUAL SHADOW LOADS / SQUARE FOOT HOURS (sfh)			
Existing / Current Shadow	Project Net New Shadow	Existing + Project Shadow	Remaining Sunlight
9.63%	**1.485%**	**11.115%**	**88.89%**
31,210,748 sfh	4,814,888 sfh	36,025,636 sfh	288,182,732 sfh

Joe DiMaggio Annual Shadow Load with Project (sfh)	36,025,636 sfh

EXISTING SHADOW DETAILS	
Range in existing shadow area coverage throughout the year	Between 2% - 72%
Time of year / time of day most affected by existing shadow	Fall / Early Morning (before 8:00 AM)

NET NEW SHADOW DETAILS	
Days net new shadow would occur (date range)	Year-round
Date(s) with most sfh net new shadow	October 11 & March 1
Season / Time of day most affected by net new shadow	Winter / Late Afternoon (after 4:30 PM)
Area of largest net new shadow (date and time)	23,682 sf (October 11 & March 1 @ 5:37 PM)
Percentage of Joe DiMaggio covered by largest shadow	27.18%
Range in shadow coverage throughout the year (area range)	Between 0% - 27% (0 - 23,682 sf)
Average shadow size across affected dates (percent coverage)	4,488 sf (5.15%)
Date(s) with the longest duration of net new shadow (duration)	October 11 & March 1 (4 hr 6 min +/- 14 min)
Range in daily net new shadow duration across affected dates	Between zero minutes up to 4 hr 6 min (+/- 14 min)
Average daily net new shadow duration across affected dates	3 hr 22 min

Timing and Seasonal Pattern of Net New Shadow

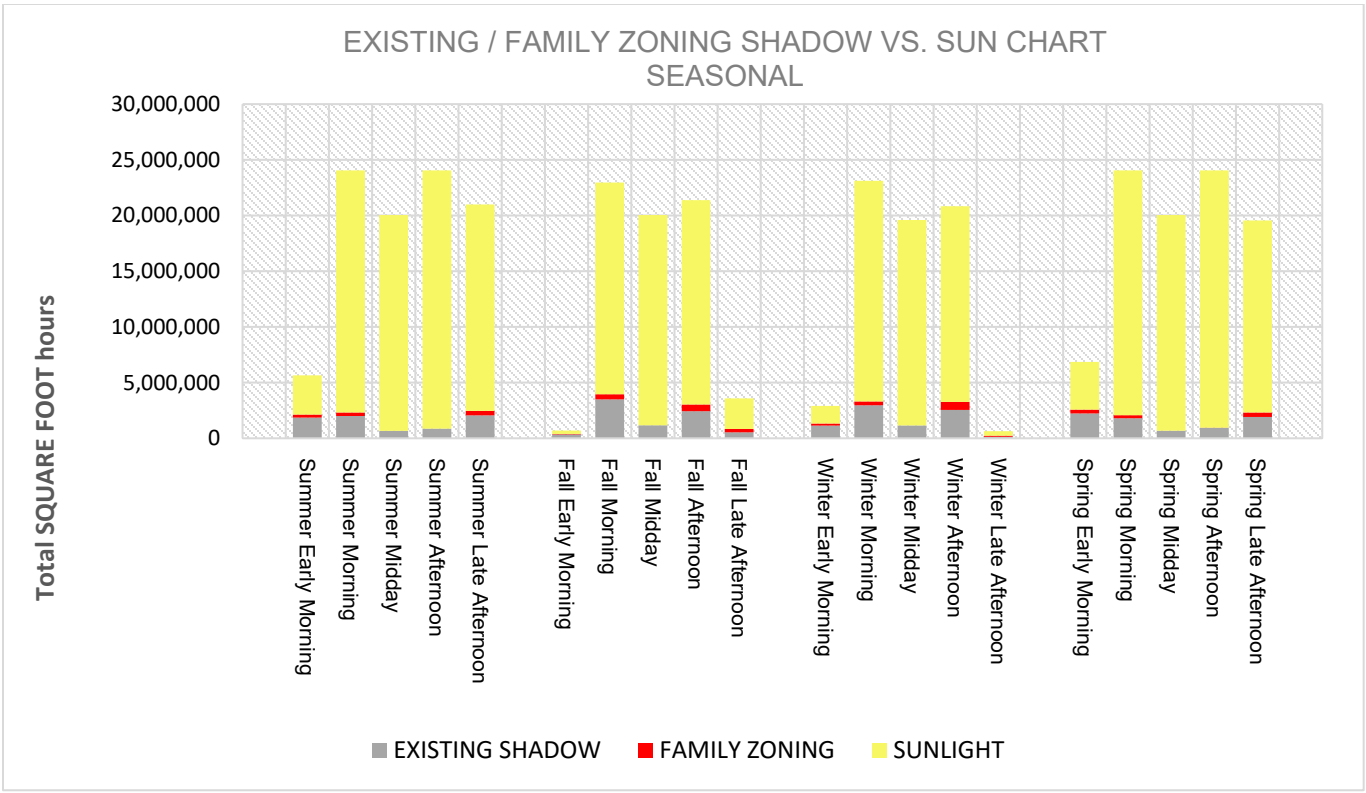
Also from the shadow summary:

- **Days net new shadow would occur:**
  - **Year-round**
- **Date(s) with most sfh net new shadow:**
  - **October 11 & March 1**
  - **Season / Time of day most affected by net new shadow: Winter / Late Afternoon (after 4:30 PM)**

Existing Shadow Context

For reference, the summary characterizes **existing shadow** as:

- **Range in existing shadow area coverage throughout the year: 2% – 72%** of the playground area
- **Time of year / time of day most affected by existing shadow: Fall / Early Morning (before 8:00 AM)**



V. QUALITATIVE CONTEXT: PLAYGROUND ACTIVITIES & TIME OF USE

This section does **not** evaluate impact or significance. It is limited to describing **typical types of activities** that commonly occur in neighborhood playgrounds like Joe DiMaggio during the times identified in the shadow summary.

A. Typical Playground Use Patterns

Based on the nature of Joe DiMaggio Playground as a neighborhood-serving facility (with play equipment, courts/fields, and open space), typical use patterns can reasonably be described as including:

- **Morning hours:**
  - Caregivers with young children,
  - Individual exercise and walking.
- **Midday / Early afternoon:**
  - Younger children and caregivers,
  - Some daytime recreation by residents and visitors.
- **Afternoon / Late afternoon (after school):**
  - **School-aged children and teens** using play areas and courts,
  - Potential **organized or informal sports activities**,
  - Families visiting after school pick-up.
- **Early evening (seasonally):**
  - Adults and families using the space after work,
  - Light recreation, socializing, and play until dusk.

These patterns are typical of urban playgrounds serving nearby residential neighborhoods with families.

B. Alignment with Net New Shadow Timing

The **shadow summary** identifies the **season and time of day most affected by net new shadow** as **"Winter / Late Afternoon (after 4:30 PM)"**, with net new shadow occurring **year-round** and the **longest durations and largest footprints** occurring around **October 11 and March 1 in the late afternoon (e.g., 5:37 PM for the largest single footprint).**
That time window generally overlaps with:

- **After-school hours** for school-aged children and teens, and
- **After-work hours** when adults and families may visit the playground.

The **existing shadow** is described as being most pronounced in **"Fall / Early Morning (before 8:00 AM)"**, which is a different part of the day than the late-afternoon period identified for net new shadow. This indicates that, under the Family Zoning scenario, the **distribution of shadow over the day** changes, with **additional shadow present during late-afternoon hours** when playground use often involves family and youth activities.
Again, this section is descriptive only and does not characterize these changes as beneficial or adverse.

VI. SUMMARY

- The Family Zoning Plan allows **increased building heights** in select areas, including near Joe DiMaggio Playground, in order to support housing production goals and apply form-based, objective design standards.
- The City's **Joe DiMaggio shadow summary** quantifies **net new annual shadow load, coverage, and timing** for the playground under the Family Zoning height scenario, showing:
    - Net new shadow of **4,814,888 sfh (1.485% of available sunlight time)**,
    - A combined total shadow load of **36,025,636 sfh (11.115%)**,
    - Maximum net new momentary coverage of **23,682 square feet (27.18% of the playground)** on specific dates and times, and
    - Concentration of net new shadow in **winter late afternoons (after 4:30 PM)**, with **year-round occurrence**.
- Typical playground use during late afternoons includes **after-school and after-work** activities by children, teens, and families, which may coincide in time with the **period identified as most affected by net new shadow**.

This concludes the **descriptive, non-evaluative summary** of the Family Zoning Plan context and the associated shadow analysis results for Joe DiMaggio Playground.

Conclusion

Fastcast has determined, based on the 3D digital zoning-based massing model and related design information provided by DataSF and the proposed Family Zoning Plan that the height increase would introduce net new shadow on Joe DiMaggio Playground relative to existing zoning conditions. The results presented herein reflect a programmatic, zoning-based analysis; as individual development proposals are advanced and more detailed building designs become available, additional project-specific shadow studies can be prepared using the same methodologies to further refine these findings.

Please direct any question to Adam Noble. adam@fastcastcity.com

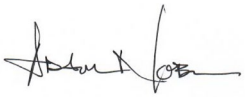


EXHIBIT A

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

FASTCAST

JUNE 21

Summer solstice
Analysis hours: 6:46 AM-7:36 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
6:46 AM	54,298 sf	62.33%	2,884 sf	3.31%	
7:00 AM	37,059 sf	42.54%	4,008 sf	4.60%	
7:15 AM	27,564 sf	31.64%	3,779 sf	4.34%	
7:30 AM	21,585 sf	24.78%	3,408 sf	3.91%	
7:45 AM	16,695 sf	19.16%	3,117 sf	3.58%	
8:00 AM	12,478 sf	14.32%	2,829 sf	3.25%	
8:15 AM	8,935 sf	10.26%	2,548 sf	2.92%	
8:30 AM	5,965 sf	6.85%	2,316 sf	2.66%	
8:45 AM	4,408 sf	5.06%	1,881 sf	2.16%	
9:00 AM	4,173 sf	4.79%	730 sf	0.84%	
9:15 AM	3,995 sf	4.59%	6 sf	0.01%	
9:30 AM	3,816 sf	4.38%	0 sf	0.00%	
9:45 AM	3,655 sf	4.20%	0 sf	0.00%	
10:00 AM	3,476 sf	3.99%	0 sf	0.00%	
10:15 AM	3,299 sf	3.79%	0 sf	0.00%	
10:30 AM	3,114 sf	3.57%	0 sf	0.00%	
10:45 AM	2,951 sf	3.39%	0 sf	0.00%	
11:00 AM	2,772 sf	3.18%	0 sf	0.00%	
11:15 AM	2,615 sf	3.00%	0 sf	0.00%	
11:30 AM	2,434 sf	2.79%	0 sf	0.00%	
11:45 AM	2,277 sf	2.61%	0 sf	0.00%	
12:00 PM	2,094 sf	2.40%	0 sf	0.00%	
12:15 PM	1,940 sf	2.23%	0 sf	0.00%	
12:30 PM	1,737 sf	1.99%	0 sf	0.00%	
12:45 PM	1,578 sf	1.81%	0 sf	0.00%	
1:00 PM	1,344 sf	1.54%	0 sf	0.00%	
1:15 PM	1,442 sf	1.66%	0 sf	0.00%	
1:30 PM	1,521 sf	1.75%	0 sf	0.00%	
1:45 PM	1,658 sf	1.90%	0 sf	0.00%	
2:00 PM	1,721 sf	1.98%	0 sf	0.00%	
2:15 PM	1,841 sf	2.11%	0 sf	0.00%	
2:30 PM	1,898 sf	2.18%	0 sf	0.00%	
2:45 PM	1,995 sf	2.29%	0 sf	0.00%	
3:00 PM	2,049 sf	2.35%	0 sf	0.00%	
3:15 PM	2,132 sf	2.45%	0 sf	0.00%	
3:30 PM	2,186 sf	2.51%	0 sf	0.00%	
3:45 PM	2,248 sf	2.58%	0 sf	0.00%	
4:00 PM	2,241 sf	2.57%	0 sf	0.00%	
4:15 PM	2,472 sf	2.84%	0 sf	0.00%	
4:30 PM	3,013 sf	3.46%	0 sf	0.00%	
4:45 PM	3,530 sf	4.05%	0 sf	0.00%	
5:00 PM	4,110 sf	4.72%	0 sf	0.00%	
5:15 PM	4,753 sf	5.46%	0 sf	0.00%	
5:30 PM	5,486 sf	6.30%	0 sf	0.00%	
5:45 PM	6,314 sf	7.25%	0 sf	0.00%	
6:00 PM	7,287 sf	8.36%	0 sf	0.00%	
6:15 PM	8,437 sf	9.68%	0 sf	0.00%	
6:30 PM	9,878 sf	11.34%	0 sf	0.00%	
6:45 PM	11,730 sf	13.46%	295 sf	0.34%	
7:00 PM	14,222 sf	16.33%	1,770 sf	2.03%	
7:15 PM	17,809 sf	20.44%	5,586 sf	6.41%	
7:36 PM	29,084 sf	33.38%	10,652 sf	12.23%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JUNE 28

Mirror date: June 14
Analysis hours: 6:48 AM-7:36 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
6:48 AM	54,172 sf	62.18%	2,814 sf	3.23%	
7:00 AM	38,856 sf	44.60%	4,046 sf	4.64%	
7:15 AM	28,513 sf	32.73%	3,845 sf	4.41%	
7:30 AM	22,279 sf	25.57%	3,463 sf	3.97%	
7:45 AM	17,311 sf	19.87%	3,154 sf	3.62%	
8:00 AM	12,968 sf	14.88%	2,875 sf	3.30%	
8:15 AM	9,336 sf	10.72%	2,593 sf	2.98%	
8:30 AM	6,273 sf	7.20%	2,353 sf	2.70%	
8:45 AM	4,507 sf	5.17%	2,014 sf	2.31%	
9:00 AM	4,222 sf	4.85%	875 sf	1.00%	
9:15 AM	4,036 sf	4.63%	30 sf	0.03%	
9:30 AM	3,857 sf	4.43%	0 sf	0.00%	
9:45 AM	3,694 sf	4.24%	0 sf	0.00%	
10:00 AM	3,516 sf	4.04%	0 sf	0.00%	
10:15 AM	3,340 sf	3.83%	0 sf	0.00%	
10:30 AM	3,152 sf	3.62%	0 sf	0.00%	
10:45 AM	2,989 sf	3.43%	0 sf	0.00%	
11:00 AM	2,807 sf	3.22%	0 sf	0.00%	
11:15 AM	2,650 sf	3.04%	0 sf	0.00%	
11:30 AM	2,469 sf	2.83%	0 sf	0.00%	
11:45 AM	2,308 sf	2.65%	0 sf	0.00%	
12:00 PM	2,127 sf	2.44%	0 sf	0.00%	
12:15 PM	1,973 sf	2.26%	0 sf	0.00%	
12:30 PM	1,769 sf	2.03%	0 sf	0.00%	
12:45 PM	1,612 sf	1.85%	0 sf	0.00%	
1:00 PM	1,364 sf	1.57%	0 sf	0.00%	
1:15 PM	1,451 sf	1.67%	0 sf	0.00%	
1:30 PM	1,523 sf	1.75%	0 sf	0.00%	
1:45 PM	1,661 sf	1.91%	0 sf	0.00%	
2:00 PM	1,728 sf	1.98%	0 sf	0.00%	
2:15 PM	1,848 sf	2.12%	0 sf	0.00%	
2:30 PM	1,902 sf	2.18%	0 sf	0.00%	
2:45 PM	2,006 sf	2.30%	0 sf	0.00%	
3:00 PM	2,063 sf	2.37%	0 sf	0.00%	
3:15 PM	2,146 sf	2.46%	0 sf	0.00%	
3:30 PM	2,197 sf	2.52%	0 sf	0.00%	
3:45 PM	2,264 sf	2.60%	0 sf	0.00%	
4:00 PM	2,230 sf	2.56%	0 sf	0.00%	
4:15 PM	2,455 sf	2.82%	0 sf	0.00%	
4:30 PM	2,953 sf	3.39%	0 sf	0.00%	
4:45 PM	3,470 sf	3.98%	0 sf	0.00%	
5:00 PM	4,046 sf	4.64%	0 sf	0.00%	
5:15 PM	4,679 sf	5.37%	0 sf	0.00%	
5:30 PM	5,407 sf	6.21%	0 sf	0.00%	
5:45 PM	6,230 sf	7.15%	0 sf	0.00%	
6:00 PM	7,192 sf	8.26%	0 sf	0.00%	
6:15 PM	8,321 sf	9.55%	0 sf	0.00%	
6:30 PM	9,741 sf	11.18%	0 sf	0.00%	
6:45 PM	11,553 sf	13.26%	223 sf	0.26%	
7:00 PM	13,976 sf	16.04%	1,556 sf	1.79%	
7:15 PM	17,471 sf	20.05%	5,228 sf	6.00%	
7:36 PM	28,841 sf	33.10%	10,732 sf	12.32%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JULY 5

Mirror date: June 7
Analysis hours: 6:52 AM-7:36 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
6:52 AM	53,801 sf	61.75%	2,547 sf	2.92%	
7:00 AM	41,891 sf	48.08%	4,088 sf	4.69%	
7:15 AM	29,973 sf	34.40%	3,979 sf	4.57%	
7:30 AM	23,337 sf	26.79%	3,577 sf	4.11%	
7:45 AM	18,182 sf	20.87%	3,252 sf	3.73%	
8:00 AM	13,674 sf	15.70%	2,949 sf	3.39%	
8:15 AM	9,879 sf	11.34%	2,662 sf	3.06%	
8:30 AM	6,755 sf	7.75%	2,412 sf	2.77%	
8:45 AM	4,826 sf	5.54%	2,115 sf	2.43%	
9:00 AM	4,330 sf	4.97%	1,079 sf	1.24%	
9:15 AM	4,139 sf	4.75%	107 sf	0.12%	
9:30 AM	3,954 sf	4.54%	0 sf	0.00%	
9:45 AM	3,782 sf	4.34%	0 sf	0.00%	
10:00 AM	3,600 sf	4.13%	0 sf	0.00%	
10:15 AM	3,421 sf	3.93%	0 sf	0.00%	
10:30 AM	3,230 sf	3.71%	0 sf	0.00%	
10:45 AM	3,063 sf	3.52%	0 sf	0.00%	
11:00 AM	2,880 sf	3.31%	0 sf	0.00%	
11:15 AM	2,722 sf	3.12%	0 sf	0.00%	
11:30 AM	2,539 sf	2.91%	0 sf	0.00%	
11:45 AM	2,377 sf	2.73%	0 sf	0.00%	
12:00 PM	2,192 sf	2.52%	0 sf	0.00%	
12:15 PM	2,041 sf	2.34%	0 sf	0.00%	
12:30 PM	1,835 sf	2.11%	0 sf	0.00%	
12:45 PM	1,675 sf	1.92%	0 sf	0.00%	
1:00 PM	1,424 sf	1.63%	0 sf	0.00%	
1:15 PM	1,483 sf	1.70%	0 sf	0.00%	
1:30 PM	1,568 sf	1.80%	0 sf	0.00%	
1:45 PM	1,705 sf	1.96%	0 sf	0.00%	
2:00 PM	1,776 sf	2.04%	0 sf	0.00%	
2:15 PM	1,894 sf	2.17%	0 sf	0.00%	
2:30 PM	1,956 sf	2.24%	0 sf	0.00%	
2:45 PM	2,062 sf	2.37%	0 sf	0.00%	
3:00 PM	2,117 sf	2.43%	0 sf	0.00%	
3:15 PM	2,204 sf	2.53%	0 sf	0.00%	
3:30 PM	2,256 sf	2.59%	0 sf	0.00%	
3:45 PM	2,337 sf	2.68%	0 sf	0.00%	
4:00 PM	2,358 sf	2.71%	0 sf	0.00%	
4:15 PM	2,466 sf	2.83%	0 sf	0.00%	
4:30 PM	2,885 sf	3.31%	0 sf	0.00%	
4:45 PM	3,408 sf	3.91%	0 sf	0.00%	
5:00 PM	3,984 sf	4.57%	0 sf	0.00%	
5:15 PM	4,615 sf	5.30%	0 sf	0.00%	
5:30 PM	5,340 sf	6.13%	0 sf	0.00%	
5:45 PM	6,165 sf	7.08%	0 sf	0.00%	
6:00 PM	7,127 sf	8.18%	0 sf	0.00%	
6:15 PM	8,255 sf	9.48%	0 sf	0.00%	
6:30 PM	9,671 sf	11.10%	0 sf	0.00%	
6:45 PM	11,478 sf	13.17%	170 sf	0.20%	
7:00 PM	13,898 sf	15.95%	1,396 sf	1.60%	
7:15 PM	17,367 sf	19.94%	4,992 sf	5.73%	
7:36 PM	28,122 sf	32.28%	10,951 sf	12.57%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JULY 12

Mirror date: May 31
Analysis hours: 6:56 AM-7:33 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
6:56 AM	53,097 sf	60.95%	2,408 sf	2.76%	
7:00 AM	47,045 sf	54.00%	3,395 sf	3.90%	
7:15 AM	32,076 sf	36.82%	4,194 sf	4.81%	
7:30 AM	24,775 sf	28.44%	3,764 sf	4.32%	
7:45 AM	19,251 sf	22.10%	3,412 sf	3.92%	
8:00 AM	14,578 sf	16.73%	3,072 sf	3.53%	
8:15 AM	10,583 sf	12.15%	2,769 sf	3.18%	
8:30 AM	7,405 sf	8.50%	2,490 sf	2.86%	
8:45 AM	5,297 sf	6.08%	2,234 sf	2.56%	
9:00 AM	4,503 sf	5.17%	1,333 sf	1.53%	
9:15 AM	4,299 sf	4.93%	244 sf	0.28%	
9:30 AM	4,099 sf	4.71%	0 sf	0.00%	
9:45 AM	3,921 sf	4.50%	0 sf	0.00%	
10:00 AM	3,732 sf	4.28%	0 sf	0.00%	
10:15 AM	3,545 sf	4.07%	0 sf	0.00%	
10:30 AM	3,347 sf	3.84%	0 sf	0.00%	
10:45 AM	3,178 sf	3.65%	0 sf	0.00%	
11:00 AM	2,989 sf	3.43%	0 sf	0.00%	
11:15 AM	2,825 sf	3.24%	0 sf	0.00%	
11:30 AM	2,640 sf	3.03%	0 sf	0.00%	
11:45 AM	2,482 sf	2.85%	0 sf	0.00%	
12:00 PM	2,290 sf	2.63%	0 sf	0.00%	
12:15 PM	2,134 sf	2.45%	0 sf	0.00%	
12:30 PM	1,930 sf	2.22%	0 sf	0.00%	
12:45 PM	1,769 sf	2.03%	0 sf	0.00%	
1:00 PM	1,511 sf	1.73%	0 sf	0.00%	
1:15 PM	1,552 sf	1.78%	0 sf	0.00%	
1:30 PM	1,648 sf	1.89%	0 sf	0.00%	
1:45 PM	1,788 sf	2.05%	0 sf	0.00%	
2:00 PM	1,857 sf	2.13%	0 sf	0.00%	
2:15 PM	1,980 sf	2.27%	0 sf	0.00%	
2:30 PM	2,043 sf	2.34%	0 sf	0.00%	
2:45 PM	2,144 sf	2.46%	0 sf	0.00%	
3:00 PM	2,204 sf	2.53%	0 sf	0.00%	
3:15 PM	2,300 sf	2.64%	0 sf	0.00%	
3:30 PM	2,352 sf	2.70%	0 sf	0.00%	
3:45 PM	2,434 sf	2.79%	0 sf	0.00%	
4:00 PM	2,473 sf	2.84%	0 sf	0.00%	
4:15 PM	2,494 sf	2.86%	0 sf	0.00%	
4:30 PM	2,739 sf	3.14%	0 sf	0.00%	
4:45 PM	3,340 sf	3.83%	0 sf	0.00%	
5:00 PM	3,920 sf	4.50%	0 sf	0.00%	
5:15 PM	4,559 sf	5.23%	0 sf	0.00%	
5:30 PM	5,289 sf	6.07%	0 sf	0.00%	
5:45 PM	6,121 sf	7.03%	0 sf	0.00%	
6:00 PM	7,093 sf	8.14%	0 sf	0.00%	
6:15 PM	8,235 sf	9.45%	0 sf	0.00%	
6:30 PM	9,661 sf	11.09%	0 sf	0.00%	
6:45 PM	11,496 sf	13.20%	125 sf	0.14%	
7:00 PM	13,972 sf	16.04%	1,296 sf	1.49%	
7:15 PM	17,555 sf	20.15%	5,128 sf	5.89%	
7:33 PM	26,959 sf	30.95%	11,312 sf	12.98%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JULY 19

Mirror date: May 24
Analysis hours: 7:01 AM-7:30 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:01 AM	52,271 sf	60.00%	2,281 sf	2.62%	
7:16 AM	33,985 sf	39.01%	4,487 sf	5.15%	
7:30 AM	26,609 sf	30.54%	4,026 sf	4.62%	
7:45 AM	20,576 sf	23.62%	3,616 sf	4.15%	
8:00 AM	15,675 sf	17.99%	3,246 sf	3.73%	
8:15 AM	11,348 sf	13.03%	2,894 sf	3.32%	
8:30 AM	8,334 sf	9.57%	2,614 sf	3.00%	
8:45 AM	5,925 sf	6.80%	2,348 sf	2.69%	
9:00 AM	4,748 sf	5.45%	1,645 sf	1.89%	
9:15 AM	4,521 sf	5.19%	435 sf	0.50%	
9:30 AM	4,297 sf	4.93%	0 sf	0.00%	
9:45 AM	4,101 sf	4.71%	0 sf	0.00%	
10:00 AM	3,908 sf	4.49%	0 sf	0.00%	
10:15 AM	3,712 sf	4.26%	0 sf	0.00%	
10:30 AM	3,506 sf	4.02%	0 sf	0.00%	
10:45 AM	3,328 sf	3.82%	0 sf	0.00%	
11:00 AM	3,134 sf	3.60%	0 sf	0.00%	
11:15 AM	2,966 sf	3.40%	0 sf	0.00%	
11:30 AM	2,777 sf	3.19%	0 sf	0.00%	
11:45 AM	2,612 sf	3.00%	0 sf	0.00%	
12:00 PM	2,418 sf	2.78%	0 sf	0.00%	
12:15 PM	2,259 sf	2.59%	0 sf	0.00%	
12:30 PM	2,055 sf	2.36%	0 sf	0.00%	
12:45 PM	1,889 sf	2.17%	0 sf	0.00%	
1:00 PM	1,634 sf	1.88%	0 sf	0.00%	
1:15 PM	1,667 sf	1.91%	0 sf	0.00%	
1:30 PM	1,764 sf	2.03%	0 sf	0.00%	
1:45 PM	1,906 sf	2.19%	0 sf	0.00%	
2:00 PM	1,976 sf	2.27%	0 sf	0.00%	
2:15 PM	2,103 sf	2.41%	0 sf	0.00%	
2:30 PM	2,169 sf	2.49%	0 sf	0.00%	
2:45 PM	2,279 sf	2.62%	0 sf	0.00%	
3:00 PM	2,341 sf	2.69%	0 sf	0.00%	
3:15 PM	2,433 sf	2.79%	0 sf	0.00%	
3:30 PM	2,495 sf	2.86%	0 sf	0.00%	
3:45 PM	2,579 sf	2.96%	0 sf	0.00%	
4:00 PM	2,632 sf	3.02%	0 sf	0.00%	
4:15 PM	2,708 sf	3.11%	0 sf	0.00%	
4:30 PM	2,796 sf	3.21%	0 sf	0.00%	
4:45 PM	3,271 sf	3.75%	0 sf	0.00%	
5:00 PM	3,867 sf	4.44%	0 sf	0.00%	
5:15 PM	4,521 sf	5.19%	0 sf	0.00%	
5:30 PM	5,258 sf	6.04%	0 sf	0.00%	
5:45 PM	6,110 sf	7.01%	0 sf	0.00%	
6:00 PM	7,108 sf	8.16%	0 sf	0.00%	
6:15 PM	8,283 sf	9.51%	0 sf	0.00%	
6:30 PM	9,748 sf	11.19%	0 sf	0.00%	
6:45 PM	11,658 sf	13.38%	95 sf	0.11%	
7:00 PM	14,252 sf	16.36%	1,311 sf	1.50%	
7:15 PM	18,041 sf	20.71%	5,948 sf	6.83%	
7:30 PM	25,516 sf	29.29%	11,670 sf	13.39%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JULY 26

Mirror date: May 17
Analysis hours: 7:07 AM-7:25 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:07 AM	51,090 sf	58.64%	2,572 sf	2.95%	
7:15 AM	38,869 sf	44.62%	4,946 sf	5.68%	
7:30 AM	29,015 sf	33.30%	4,396 sf	5.05%	
7:45 AM	22,226 sf	25.51%	3,892 sf	4.47%	
8:00 AM	17,041 sf	19.56%	3,464 sf	3.98%	
8:15 AM	12,600 sf	14.46%	3,080 sf	3.54%	
8:30 AM	9,453 sf	10.85%	2,749 sf	3.16%	
8:45 AM	6,765 sf	7.77%	2,461 sf	2.82%	
9:00 AM	5,085 sf	5.84%	1,979 sf	2.27%	
9:15 AM	4,794 sf	5.50%	709 sf	0.81%	
9:30 AM	4,553 sf	5.23%	0 sf	0.00%	
9:45 AM	4,336 sf	4.98%	0 sf	0.00%	
10:00 AM	4,121 sf	4.73%	0 sf	0.00%	
10:15 AM	3,918 sf	4.50%	0 sf	0.00%	
10:30 AM	3,704 sf	4.25%	0 sf	0.00%	
10:45 AM	3,517 sf	4.04%	0 sf	0.00%	
11:00 AM	3,313 sf	3.80%	0 sf	0.00%	
11:15 AM	3,139 sf	3.60%	0 sf	0.00%	
11:30 AM	2,940 sf	3.37%	0 sf	0.00%	
11:45 AM	2,774 sf	3.18%	0 sf	0.00%	
12:00 PM	2,575 sf	2.96%	0 sf	0.00%	
12:15 PM	2,411 sf	2.77%	0 sf	0.00%	
12:30 PM	2,204 sf	2.53%	0 sf	0.00%	
12:45 PM	2,039 sf	2.34%	0 sf	0.00%	
1:00 PM	1,783 sf	2.05%	0 sf	0.00%	
1:15 PM	1,826 sf	2.10%	0 sf	0.00%	
1:30 PM	1,921 sf	2.21%	0 sf	0.00%	
1:45 PM	2,063 sf	2.37%	0 sf	0.00%	
2:00 PM	2,139 sf	2.45%	0 sf	0.00%	
2:15 PM	2,261 sf	2.60%	0 sf	0.00%	
2:30 PM	2,336 sf	2.68%	0 sf	0.00%	
2:45 PM	2,452 sf	2.81%	0 sf	0.00%	
3:00 PM	2,518 sf	2.89%	0 sf	0.00%	
3:15 PM	2,619 sf	3.01%	0 sf	0.00%	
3:30 PM	2,681 sf	3.08%	0 sf	0.00%	
3:45 PM	2,775 sf	3.19%	0 sf	0.00%	
4:00 PM	2,839 sf	3.26%	0 sf	0.00%	
4:15 PM	2,913 sf	3.34%	0 sf	0.00%	
4:30 PM	2,900 sf	3.33%	0 sf	0.00%	
4:45 PM	3,172 sf	3.64%	0 sf	0.00%	
5:00 PM	3,822 sf	4.39%	0 sf	0.00%	
5:15 PM	4,489 sf	5.15%	0 sf	0.00%	
5:30 PM	5,251 sf	6.03%	0 sf	0.00%	
5:45 PM	6,127 sf	7.03%	0 sf	0.00%	
6:00 PM	7,164 sf	8.22%	0 sf	0.00%	
6:15 PM	8,391 sf	9.63%	0 sf	0.00%	
6:30 PM	9,922 sf	11.39%	0 sf	0.00%	
6:45 PM	11,942 sf	13.71%	76 sf	0.09%	
7:00 PM	14,750 sf	16.93%	2,024 sf	2.32%	
7:15 PM	18,880 sf	21.67%	7,511 sf	8.62%	
7:25 PM	23,869 sf	27.40%	11,981 sf	13.75%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 2

Mirror date: May 10
Analysis hours: 7:12 AM-7:18 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:12 AM	48,899 sf	56.13%	3,210 sf	3.68%	
7:15 AM	44,825 sf	51.45%	4,215 sf	4.84%	
7:30 AM	31,918 sf	36.64%	4,868 sf	5.59%	
7:45 AM	24,175 sf	27.75%	4,263 sf	4.89%	
8:00 AM	18,553 sf	21.30%	3,728 sf	4.28%	
8:15 AM	14,279 sf	16.39%	3,295 sf	3.78%	
8:30 AM	10,743 sf	12.33%	2,923 sf	3.36%	
8:45 AM	7,817 sf	8.97%	2,600 sf	2.98%	
9:00 AM	5,672 sf	6.51%	2,244 sf	2.58%	
9:15 AM	5,131 sf	5.89%	1,027 sf	1.18%	
9:30 AM	4,852 sf	5.57%	31 sf	0.04%	
9:45 AM	4,613 sf	5.30%	0 sf	0.00%	
10:00 AM	4,376 sf	5.02%	0 sf	0.00%	
10:15 AM	4,168 sf	4.78%	0 sf	0.00%	
10:30 AM	3,937 sf	4.52%	0 sf	0.00%	
10:45 AM	3,739 sf	4.29%	0 sf	0.00%	
11:00 AM	3,523 sf	4.04%	0 sf	0.00%	
11:15 AM	3,342 sf	3.84%	0 sf	0.00%	
11:30 AM	3,133 sf	3.60%	0 sf	0.00%	
11:45 AM	2,962 sf	3.40%	0 sf	0.00%	
12:00 PM	2,757 sf	3.16%	0 sf	0.00%	
12:15 PM	2,591 sf	2.97%	0 sf	0.00%	
12:30 PM	2,382 sf	2.73%	0 sf	0.00%	
12:45 PM	2,210 sf	2.54%	0 sf	0.00%	
1:00 PM	1,959 sf	2.25%	0 sf	0.00%	
1:15 PM	2,024 sf	2.32%	0 sf	0.00%	
1:30 PM	2,120 sf	2.43%	0 sf	0.00%	
1:45 PM	2,258 sf	2.59%	0 sf	0.00%	
2:00 PM	2,339 sf	2.69%	0 sf	0.00%	
2:15 PM	2,465 sf	2.83%	0 sf	0.00%	
2:30 PM	2,542 sf	2.92%	0 sf	0.00%	
2:45 PM	2,661 sf	3.05%	0 sf	0.00%	
3:00 PM	2,738 sf	3.14%	0 sf	0.00%	
3:15 PM	2,844 sf	3.26%	0 sf	0.00%	
3:30 PM	2,912 sf	3.34%	0 sf	0.00%	
3:45 PM	3,018 sf	3.46%	0 sf	0.00%	
4:00 PM	3,086 sf	3.54%	0 sf	0.00%	
4:15 PM	3,193 sf	3.67%	0 sf	0.00%	
4:30 PM	3,263 sf	3.74%	0 sf	0.00%	
4:45 PM	3,320 sf	3.81%	0 sf	0.00%	
5:00 PM	3,739 sf	4.29%	0 sf	0.00%	
5:15 PM	4,484 sf	5.15%	0 sf	0.00%	
5:30 PM	5,284 sf	6.06%	0 sf	0.00%	
5:45 PM	6,195 sf	7.11%	0 sf	0.00%	
6:00 PM	7,291 sf	8.37%	0 sf	0.00%	
6:15 PM	8,600 sf	9.87%	0 sf	0.00%	
6:30 PM	10,238 sf	11.75%	20 sf	0.02%	
6:45 PM	12,439 sf	14.28%	571 sf	0.66%	
7:00 PM	15,579 sf	17.88%	3,668 sf	4.21%	
7:15 PM	20,473 sf	23.50%	9,975 sf	11.45%	
7:18 PM	22,329 sf	25.63%	11,739 sf	13.47%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 9

Mirror date: May 3
Analysis hours: 7:19 AM-7:10 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:19 AM	47,564 sf	54.60%	3,935 sf	4.52%	
7:30 AM	35,705 sf	40.98%	5,440 sf	6.24%	
7:45 AM	26,531 sf	30.45%	4,730 sf	5.43%	
8:00 AM	20,849 sf	23.93%	4,088 sf	4.69%	
8:15 AM	16,239 sf	18.64%	3,560 sf	4.09%	
8:30 AM	12,269 sf	14.08%	3,131 sf	3.59%	
8:45 AM	9,041 sf	10.38%	2,768 sf	3.18%	
9:00 AM	6,489 sf	7.45%	2,425 sf	2.78%	
9:15 AM	5,524 sf	6.34%	1,383 sf	1.59%	
9:30 AM	5,210 sf	5.98%	162 sf	0.19%	
9:45 AM	4,940 sf	5.67%	0 sf	0.00%	
10:00 AM	4,678 sf	5.37%	0 sf	0.00%	
10:15 AM	4,449 sf	5.11%	0 sf	0.00%	
10:30 AM	4,206 sf	4.83%	0 sf	0.00%	
10:45 AM	3,993 sf	4.58%	0 sf	0.00%	
11:00 AM	3,769 sf	4.33%	0 sf	0.00%	
11:15 AM	3,570 sf	4.10%	0 sf	0.00%	
11:30 AM	3,356 sf	3.85%	0 sf	0.00%	
11:45 AM	3,181 sf	3.65%	0 sf	0.00%	
12:00 PM	2,969 sf	3.41%	0 sf	0.00%	
12:15 PM	2,796 sf	3.21%	0 sf	0.00%	
12:30 PM	2,582 sf	2.96%	0 sf	0.00%	
12:45 PM	2,405 sf	2.76%	0 sf	0.00%	
1:00 PM	2,161 sf	2.48%	0 sf	0.00%	
1:15 PM	2,255 sf	2.59%	0 sf	0.00%	
1:30 PM	2,348 sf	2.69%	0 sf	0.00%	
1:45 PM	2,489 sf	2.86%	0 sf	0.00%	
2:00 PM	2,572 sf	2.95%	0 sf	0.00%	
2:15 PM	2,707 sf	3.11%	0 sf	0.00%	
2:30 PM	2,790 sf	3.20%	0 sf	0.00%	
2:45 PM	2,916 sf	3.35%	0 sf	0.00%	
3:00 PM	2,993 sf	3.44%	0 sf	0.00%	
3:15 PM	3,113 sf	3.57%	0 sf	0.00%	
3:30 PM	3,195 sf	3.67%	0 sf	0.00%	
3:45 PM	3,308 sf	3.80%	0 sf	0.00%	
4:00 PM	3,388 sf	3.89%	0 sf	0.00%	
4:15 PM	3,499 sf	4.02%	0 sf	0.00%	
4:30 PM	3,591 sf	4.12%	0 sf	0.00%	
4:45 PM	3,715 sf	4.26%	0 sf	0.00%	
5:00 PM	3,848 sf	4.42%	0 sf	0.00%	
5:15 PM	4,499 sf	5.16%	0 sf	0.00%	
5:30 PM	5,347 sf	6.14%	0 sf	0.00%	
5:45 PM	6,322 sf	7.26%	0 sf	0.00%	
6:00 PM	7,490 sf	8.60%	0 sf	0.00%	
6:15 PM	8,906 sf	10.22%	38 sf	0.04%	
6:30 PM	10,707 sf	12.29%	646 sf	0.74%	
6:45 PM	13,191 sf	15.14%	1,973 sf	2.26%	
7:10 PM	20,827 sf	23.91%	11,528 sf	13.23%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 16

Mirror date: April 26
Analysis hours: 7:25 AM-7:02 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:25 AM	47,761 sf	54.82%	4,668 sf	5.36%	
7:30 AM	41,320 sf	47.43%	5,845 sf	6.71%	
7:45 AM	30,535 sf	35.05%	5,324 sf	6.11%	
8:00 AM	23,646 sf	27.14%	4,536 sf	5.21%	
8:15 AM	18,585 sf	21.33%	3,889 sf	4.46%	
8:30 AM	14,077 sf	16.16%	3,376 sf	3.88%	
8:45 AM	10,458 sf	12.00%	2,964 sf	3.40%	
9:00 AM	7,514 sf	8.62%	2,604 sf	2.99%	
9:15 AM	5,982 sf	6.87%	1,796 sf	2.06%	
9:30 AM	5,623 sf	6.45%	383 sf	0.44%	
9:45 AM	5,318 sf	6.10%	0 sf	0.00%	
10:00 AM	5,027 sf	5.77%	0 sf	0.00%	
10:15 AM	4,774 sf	5.48%	0 sf	0.00%	
10:30 AM	4,509 sf	5.18%	0 sf	0.00%	
10:45 AM	4,281 sf	4.91%	0 sf	0.00%	
11:00 AM	4,052 sf	4.65%	0 sf	0.00%	
11:15 AM	3,842 sf	4.41%	0 sf	0.00%	
11:30 AM	3,612 sf	4.15%	0 sf	0.00%	
11:45 AM	3,421 sf	3.93%	0 sf	0.00%	
12:00 PM	3,203 sf	3.68%	0 sf	0.00%	
12:15 PM	3,026 sf	3.47%	0 sf	0.00%	
12:30 PM	2,811 sf	3.23%	0 sf	0.00%	
12:45 PM	2,630 sf	3.02%	0 sf	0.00%	
1:00 PM	2,394 sf	2.75%	0 sf	0.00%	
1:15 PM	2,524 sf	2.90%	0 sf	0.00%	
1:30 PM	2,617 sf	3.00%	0 sf	0.00%	
1:45 PM	2,760 sf	3.17%	0 sf	0.00%	
2:00 PM	2,850 sf	3.27%	0 sf	0.00%	
2:15 PM	2,986 sf	3.43%	0 sf	0.00%	
2:30 PM	3,074 sf	3.53%	0 sf	0.00%	
2:45 PM	3,210 sf	3.68%	0 sf	0.00%	
3:00 PM	3,298 sf	3.79%	0 sf	0.00%	
3:15 PM	3,431 sf	3.94%	0 sf	0.00%	
3:30 PM	3,519 sf	4.04%	0 sf	0.00%	
3:45 PM	3,645 sf	4.18%	0 sf	0.00%	
4:00 PM	3,749 sf	4.30%	0 sf	0.00%	
4:15 PM	3,879 sf	4.45%	0 sf	0.00%	
4:30 PM	3,999 sf	4.59%	0 sf	0.00%	
4:45 PM	4,134 sf	4.75%	0 sf	0.00%	
5:00 PM	4,283 sf	4.92%	0 sf	0.00%	
5:15 PM	4,533 sf	5.20%	0 sf	0.00%	
5:30 PM	5,442 sf	6.25%	0 sf	0.00%	
5:45 PM	6,492 sf	7.45%	0 sf	0.00%	
6:00 PM	7,765 sf	8.91%	81 sf	0.09%	
6:15 PM	9,339 sf	10.72%	840 sf	0.96%	
6:30 PM	11,363 sf	13.04%	2,115 sf	2.43%	
6:45 PM	14,244 sf	16.35%	3,921 sf	4.50%	
7:02 PM	19,740 sf	22.66%	11,497 sf	13.20%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 23

Mirror date: April 19
Analysis hours: 7:31 AM-6:52 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:31 AM	49,794 sf	57.16%	5,555 sf	6.38%	
7:45 AM	35,845 sf	41.14%	5,990 sf	6.88%	
8:00 AM	26,999 sf	30.99%	5,084 sf	5.84%	
8:15 AM	21,114 sf	24.24%	4,292 sf	4.93%	
8:30 AM	16,082 sf	18.46%	3,674 sf	4.22%	
8:45 AM	12,020 sf	13.80%	3,182 sf	3.65%	
9:00 AM	8,672 sf	9.95%	2,776 sf	3.19%	
9:15 AM	6,533 sf	7.50%	2,192 sf	2.52%	
9:30 AM	6,083 sf	6.98%	646 sf	0.74%	
9:45 AM	5,739 sf	6.59%	0 sf	0.00%	
10:00 AM	5,409 sf	6.21%	0 sf	0.00%	
10:15 AM	5,131 sf	5.89%	0 sf	0.00%	
10:30 AM	4,843 sf	5.56%	0 sf	0.00%	
10:45 AM	4,602 sf	5.28%	0 sf	0.00%	
11:00 AM	4,341 sf	4.98%	0 sf	0.00%	
11:15 AM	4,132 sf	4.74%	0 sf	0.00%	
11:30 AM	3,892 sf	4.47%	0 sf	0.00%	
11:45 AM	3,696 sf	4.24%	0 sf	0.00%	
12:00 PM	3,471 sf	3.98%	0 sf	0.00%	
12:15 PM	3,284 sf	3.77%	0 sf	0.00%	
12:30 PM	3,059 sf	3.51%	0 sf	0.00%	
12:45 PM	2,867 sf	3.29%	0 sf	0.00%	
1:00 PM	2,667 sf	3.06%	0 sf	0.00%	
1:15 PM	2,825 sf	3.24%	0 sf	0.00%	
1:30 PM	2,926 sf	3.36%	0 sf	0.00%	
1:45 PM	3,069 sf	3.52%	0 sf	0.00%	
2:00 PM	3,164 sf	3.63%	0 sf	0.00%	
2:15 PM	3,304 sf	3.79%	0 sf	0.00%	
2:30 PM	3,407 sf	3.91%	0 sf	0.00%	
2:45 PM	3,551 sf	4.08%	0 sf	0.00%	
3:00 PM	3,655 sf	4.20%	0 sf	0.00%	
3:15 PM	3,794 sf	4.35%	0 sf	0.00%	
3:30 PM	3,904 sf	4.48%	0 sf	0.00%	
3:45 PM	4,052 sf	4.65%	0 sf	0.00%	
4:00 PM	4,165 sf	4.78%	0 sf	0.00%	
4:15 PM	4,327 sf	4.97%	0 sf	0.00%	
4:30 PM	4,458 sf	5.12%	0 sf	0.00%	
4:45 PM	4,647 sf	5.33%	0 sf	0.00%	
5:00 PM	4,824 sf	5.54%	0 sf	0.00%	
5:15 PM	5,061 sf	5.81%	0 sf	0.00%	
5:30 PM	5,505 sf	6.32%	0 sf	0.00%	
5:45 PM	6,760 sf	7.76%	168 sf	0.19%	
6:00 PM	8,184 sf	9.39%	1,072 sf	1.23%	
6:15 PM	9,975 sf	11.45%	2,417 sf	2.77%	
6:30 PM	12,345 sf	14.17%	4,204 sf	4.83%	
6:45 PM	16,012 sf	18.38%	7,130 sf	8.18%	
6:52 PM	19,022 sf	21.83%	11,173 sf	12.82%	

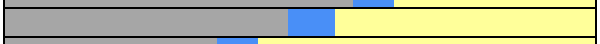
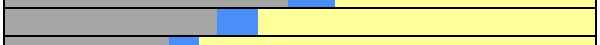
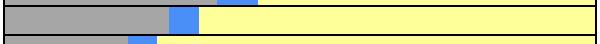
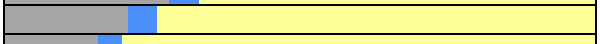
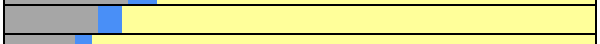
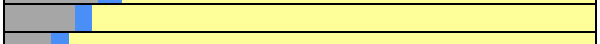
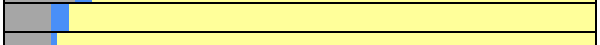
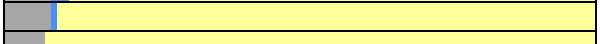
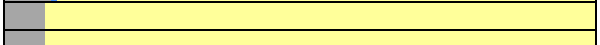
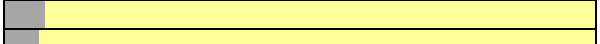
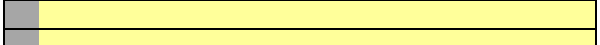
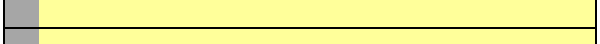
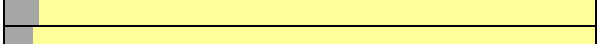
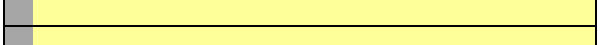
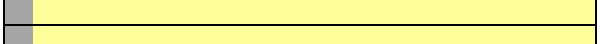
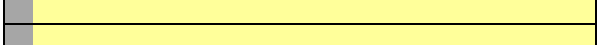
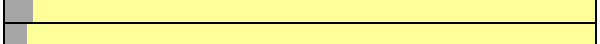
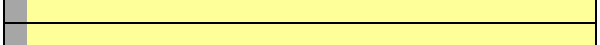
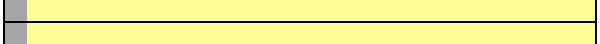
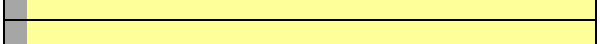
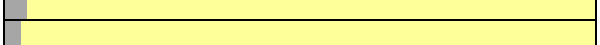
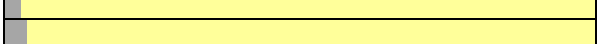
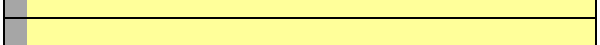
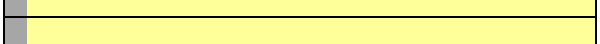
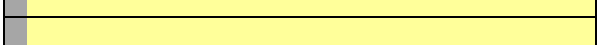
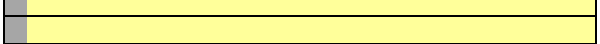
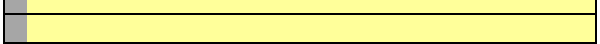
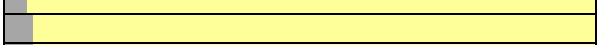
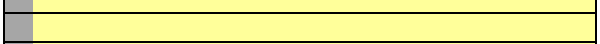
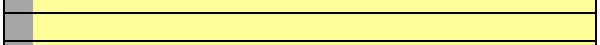
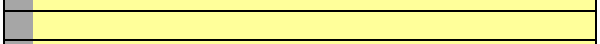
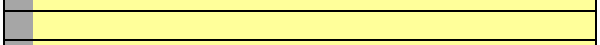
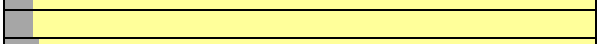
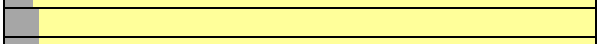
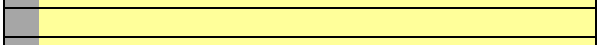
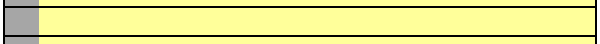
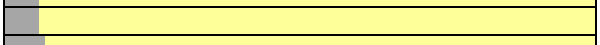
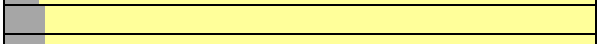
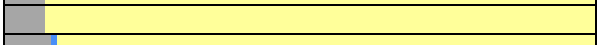
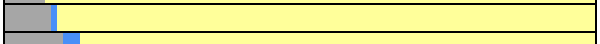
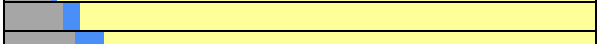
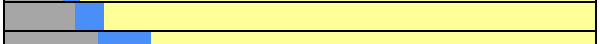
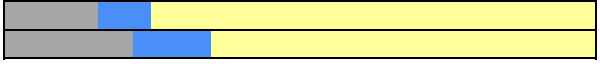
PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 30

Mirror date: April 12
Analysis hours: 7:37 AM-6:42 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:37 AM	51,378 sf	58.97%	6,128 sf	7.03%	
7:45 AM	42,077 sf	48.30%	6,569 sf	7.54%	
8:00 AM	31,050 sf	35.64%	5,750 sf	6.60%	
8:15 AM	23,975 sf	27.52%	4,748 sf	5.45%	
8:30 AM	18,431 sf	21.16%	3,986 sf	4.58%	
8:45 AM	13,812 sf	15.85%	3,398 sf	3.90%	
9:00 AM	10,078 sf	11.57%	2,926 sf	3.36%	
9:15 AM	7,344 sf	8.43%	2,468 sf	2.83%	
9:30 AM	6,600 sf	7.58%	976 sf	1.12%	
9:45 AM	6,204 sf	7.12%	0 sf	0.00%	
10:00 AM	5,837 sf	6.70%	0 sf	0.00%	
10:15 AM	5,526 sf	6.34%	0 sf	0.00%	
10:30 AM	5,216 sf	5.99%	0 sf	0.00%	
10:45 AM	4,950 sf	5.68%	0 sf	0.00%	
11:00 AM	4,674 sf	5.37%	0 sf	0.00%	
11:15 AM	4,450 sf	5.11%	0 sf	0.00%	
11:30 AM	4,196 sf	4.82%	0 sf	0.00%	
11:45 AM	3,989 sf	4.58%	0 sf	0.00%	
12:00 PM	3,759 sf	4.32%	0 sf	0.00%	
12:15 PM	3,567 sf	4.09%	0 sf	0.00%	
12:30 PM	3,338 sf	3.83%	0 sf	0.00%	
12:45 PM	3,147 sf	3.61%	0 sf	0.00%	
1:00 PM	2,985 sf	3.43%	0 sf	0.00%	
1:15 PM	3,168 sf	3.64%	0 sf	0.00%	
1:30 PM	3,268 sf	3.75%	0 sf	0.00%	
1:45 PM	3,418 sf	3.92%	0 sf	0.00%	
2:00 PM	3,516 sf	4.04%	0 sf	0.00%	
2:15 PM	3,673 sf	4.22%	0 sf	0.00%	
2:30 PM	3,782 sf	4.34%	0 sf	0.00%	
2:45 PM	3,934 sf	4.52%	0 sf	0.00%	
3:00 PM	4,052 sf	4.65%	0 sf	0.00%	
3:15 PM	4,215 sf	4.84%	0 sf	0.00%	
3:30 PM	4,340 sf	4.98%	0 sf	0.00%	
3:45 PM	4,507 sf	5.17%	0 sf	0.00%	
4:00 PM	4,653 sf	5.34%	0 sf	0.00%	
4:15 PM	4,844 sf	5.56%	0 sf	0.00%	
4:30 PM	5,019 sf	5.76%	0 sf	0.00%	
4:45 PM	5,239 sf	6.01%	0 sf	0.00%	
5:00 PM	5,496 sf	6.31%	0 sf	0.00%	
5:15 PM	5,783 sf	6.64%	0 sf	0.00%	
5:30 PM	6,102 sf	7.00%	265 sf	0.30%	
5:45 PM	7,111 sf	8.16%	1,248 sf	1.43%	
6:00 PM	8,743 sf	10.04%	2,673 sf	3.07%	
6:15 PM	10,847 sf	12.45%	4,619 sf	5.30%	
6:30 PM	13,976 sf	16.04%	7,537 sf	8.65%	
6:42 PM	18,780 sf	21.56%	10,984 sf	12.61%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

SEPTEMBER 6

Mirror date: April 5
Analysis hours: 7:44 AM-6:31 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:44 AM	51,583 sf	59.21%	6,349 sf	7.29%	
8:00 AM	35,558 sf	40.82%	6,199 sf	7.12%	
8:15 AM	27,140 sf	31.15%	5,098 sf	5.85%	
8:30 AM	21,004 sf	24.11%	4,222 sf	4.85%	
8:45 AM	15,770 sf	18.10%	3,569 sf	4.10%	
9:00 AM	11,600 sf	13.32%	3,055 sf	3.51%	
9:15 AM	8,406 sf	9.65%	2,619 sf	3.01%	
9:30 AM	7,169 sf	8.23%	1,322 sf	1.52%	
9:45 AM	6,717 sf	7.71%	35 sf	0.04%	
10:00 AM	6,300 sf	7.23%	0 sf	0.00%	
10:15 AM	5,963 sf	6.84%	0 sf	0.00%	
10:30 AM	5,617 sf	6.45%	0 sf	0.00%	
10:45 AM	5,334 sf	6.12%	0 sf	0.00%	
11:00 AM	5,043 sf	5.79%	0 sf	0.00%	
11:15 AM	4,802 sf	5.51%	0 sf	0.00%	
11:30 AM	4,538 sf	5.21%	0 sf	0.00%	
11:45 AM	4,315 sf	4.95%	0 sf	0.00%	
12:00 PM	4,074 sf	4.68%	0 sf	0.00%	
12:15 PM	3,874 sf	4.45%	0 sf	0.00%	
12:30 PM	3,640 sf	4.18%	0 sf	0.00%	
12:45 PM	3,403 sf	3.91%	0 sf	0.00%	
1:00 PM	3,367 sf	3.86%	0 sf	0.00%	
1:15 PM	3,544 sf	4.07%	0 sf	0.00%	
1:30 PM	3,646 sf	4.18%	0 sf	0.00%	
1:45 PM	3,800 sf	4.36%	0 sf	0.00%	
2:00 PM	3,913 sf	4.49%	0 sf	0.00%	
2:15 PM	4,072 sf	4.67%	0 sf	0.00%	
2:30 PM	4,193 sf	4.81%	0 sf	0.00%	
2:45 PM	4,370 sf	5.02%	0 sf	0.00%	
3:00 PM	4,501 sf	5.17%	0 sf	0.00%	
3:15 PM	4,683 sf	5.37%	0 sf	0.00%	
3:30 PM	4,830 sf	5.54%	0 sf	0.00%	
3:45 PM	5,036 sf	5.78%	0 sf	0.00%	
4:00 PM	5,217 sf	5.99%	0 sf	0.00%	
4:15 PM	5,444 sf	6.25%	0 sf	0.00%	
4:30 PM	5,666 sf	6.50%	0 sf	0.00%	
4:45 PM	5,950 sf	6.83%	0 sf	0.00%	
5:00 PM	6,254 sf	7.18%	0 sf	0.00%	
5:15 PM	6,630 sf	7.61%	396 sf	0.45%	
5:30 PM	7,134 sf	8.19%	1,335 sf	1.53%	
5:45 PM	7,737 sf	8.88%	2,848 sf	3.27%	
6:00 PM	9,498 sf	10.90%	4,921 sf	5.65%	
6:15 PM	12,376 sf	14.21%	8,246 sf	9.46%	
6:31 PM	18,770 sf	21.54%	13,560 sf	15.56%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

SEPTEMBER 13

Mirror date: March 29
Analysis hours: 7:50 AM-6:21 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:50 AM	50,273 sf	57.71%	6,355 sf	7.29%	
8:00 AM	39,499 sf	45.34%	6,482 sf	7.44%	
8:15 AM	29,502 sf	33.86%	5,471 sf	6.28%	
8:30 AM	22,804 sf	26.18%	4,477 sf	5.14%	
8:45 AM	17,204 sf	19.75%	3,746 sf	4.30%	
9:00 AM	12,773 sf	14.66%	3,183 sf	3.65%	
9:15 AM	9,286 sf	10.66%	2,730 sf	3.13%	
9:30 AM	7,542 sf	8.66%	1,693 sf	1.94%	
9:45 AM	7,088 sf	8.14%	170 sf	0.19%	
10:00 AM	6,704 sf	7.69%	0 sf	0.00%	
10:15 AM	6,361 sf	7.30%	0 sf	0.00%	
10:30 AM	6,063 sf	6.96%	0 sf	0.00%	
10:45 AM	5,761 sf	6.61%	0 sf	0.00%	
11:00 AM	5,448 sf	6.25%	0 sf	0.00%	
11:15 AM	5,181 sf	5.95%	0 sf	0.00%	
11:30 AM	4,898 sf	5.62%	0 sf	0.00%	
11:45 AM	4,672 sf	5.36%	0 sf	0.00%	
12:00 PM	4,420 sf	5.07%	0 sf	0.00%	
12:15 PM	4,214 sf	4.84%	0 sf	0.00%	
12:30 PM	3,970 sf	4.56%	0 sf	0.00%	
12:45 PM	3,751 sf	4.31%	0 sf	0.00%	
1:00 PM	3,791 sf	4.35%	0 sf	0.00%	
1:15 PM	3,956 sf	4.54%	0 sf	0.00%	
1:30 PM	4,063 sf	4.66%	0 sf	0.00%	
1:45 PM	4,226 sf	4.85%	0 sf	0.00%	
2:00 PM	4,346 sf	4.99%	0 sf	0.00%	
2:15 PM	4,524 sf	5.19%	0 sf	0.00%	
2:30 PM	4,658 sf	5.35%	0 sf	0.00%	
2:45 PM	4,847 sf	5.56%	0 sf	0.00%	
3:00 PM	5,003 sf	5.74%	0 sf	0.00%	
3:15 PM	5,213 sf	5.98%	0 sf	0.00%	
3:30 PM	5,394 sf	6.19%	0 sf	0.00%	
3:45 PM	5,629 sf	6.46%	0 sf	0.00%	
4:00 PM	5,852 sf	6.72%	0 sf	0.00%	
4:15 PM	6,139 sf	7.05%	0 sf	0.00%	
4:30 PM	6,418 sf	7.37%	0 sf	0.00%	
4:45 PM	6,788 sf	7.79%	36 sf	0.04%	
5:00 PM	7,188 sf	8.25%	518 sf	0.59%	
5:15 PM	7,717 sf	8.86%	1,419 sf	1.63%	
5:30 PM	8,362 sf	9.60%	2,769 sf	3.18%	
5:45 PM	9,273 sf	10.64%	5,045 sf	5.79%	
6:00 PM	10,898 sf	12.51%	8,608 sf	9.88%	
6:15 PM	16,029 sf	18.40%	13,134 sf	15.08%	
6:21 PM	18,876 sf	21.67%	16,664 sf	19.13%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

SEPTEMBER 20

Fall equinox (Spring equinox on March 22 similar)
Analysis hours: 7:57 AM-6:09 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:57 AM	48,971 sf	56.21%	6,393 sf	7.34%	
8:00 AM	44,700 sf	51.31%	6,801 sf	7.81%	
8:15 AM	32,008 sf	36.74%	5,865 sf	6.73%	
8:30 AM	24,397 sf	28.00%	4,773 sf	5.48%	
8:45 AM	18,510 sf	21.25%	3,953 sf	4.54%	
9:00 AM	13,724 sf	15.75%	3,317 sf	3.81%	
9:15 AM	9,958 sf	11.43%	2,829 sf	3.25%	
9:30 AM	7,589 sf	8.71%	2,092 sf	2.40%	
9:45 AM	7,131 sf	8.19%	396 sf	0.45%	
10:00 AM	6,763 sf	7.76%	0 sf	0.00%	
10:15 AM	6,427 sf	7.38%	0 sf	0.00%	
10:30 AM	6,131 sf	7.04%	0 sf	0.00%	
10:45 AM	5,854 sf	6.72%	0 sf	0.00%	
11:00 AM	5,600 sf	6.43%	0 sf	0.00%	
11:15 AM	5,362 sf	6.15%	0 sf	0.00%	
11:30 AM	5,141 sf	5.90%	0 sf	0.00%	
11:45 AM	4,939 sf	5.67%	0 sf	0.00%	
12:00 PM	4,746 sf	5.45%	0 sf	0.00%	
12:15 PM	4,570 sf	5.25%	0 sf	0.00%	
12:30 PM	4,334 sf	4.97%	0 sf	0.00%	
12:45 PM	4,138 sf	4.75%	0 sf	0.00%	
1:00 PM	4,241 sf	4.87%	0 sf	0.00%	
1:15 PM	4,404 sf	5.06%	0 sf	0.00%	
1:30 PM	4,516 sf	5.18%	0 sf	0.00%	
1:45 PM	4,690 sf	5.38%	0 sf	0.00%	
2:00 PM	4,822 sf	5.54%	0 sf	0.00%	
2:15 PM	5,015 sf	5.76%	0 sf	0.00%	
2:30 PM	5,166 sf	5.93%	0 sf	0.00%	
2:45 PM	5,381 sf	6.18%	0 sf	0.00%	
3:00 PM	5,564 sf	6.39%	0 sf	0.00%	
3:15 PM	5,805 sf	6.66%	0 sf	0.00%	
3:30 PM	6,023 sf	6.91%	0 sf	0.00%	
3:45 PM	6,309 sf	7.24%	0 sf	0.00%	
4:00 PM	6,577 sf	7.55%	0 sf	0.00%	
4:15 PM	6,934 sf	7.96%	0 sf	0.00%	
4:30 PM	7,307 sf	8.39%	99 sf	0.11%	
4:45 PM	7,784 sf	8.93%	546 sf	0.63%	
5:00 PM	8,321 sf	9.55%	1,360 sf	1.56%	
5:15 PM	9,028 sf	10.36%	2,637 sf	3.03%	
5:30 PM	9,912 sf	11.38%	4,651 sf	5.34%	
5:45 PM	11,638 sf	13.36%	8,117 sf	9.32%	
6:00 PM	15,343 sf	17.61%	13,814 sf	15.86%	
6:09 PM	19,013 sf	21.82%	20,103 sf	23.08%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

SEPTEMBER 27

Mirror date: March 15
Analysis hours: 8:03 AM-5:58 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:03 AM	47,524 sf	54.55%	6,398 sf	7.34%	
8:15 AM	35,019 sf	40.20%	6,254 sf	7.18%	
8:30 AM	26,112 sf	29.97%	5,127 sf	5.89%	
8:45 AM	19,923 sf	22.87%	4,186 sf	4.80%	
9:00 AM	14,724 sf	16.90%	3,480 sf	3.99%	
9:15 AM	10,705 sf	12.29%	2,948 sf	3.38%	
9:30 AM	7,691 sf	8.83%	2,458 sf	2.82%	
9:45 AM	7,111 sf	8.16%	685 sf	0.79%	
10:00 AM	6,725 sf	7.72%	0 sf	0.00%	
10:15 AM	6,401 sf	7.35%	0 sf	0.00%	
10:30 AM	6,116 sf	7.02%	0 sf	0.00%	
10:45 AM	5,852 sf	6.72%	0 sf	0.00%	
11:00 AM	5,614 sf	6.44%	0 sf	0.00%	
11:15 AM	5,384 sf	6.18%	0 sf	0.00%	
11:30 AM	5,178 sf	5.94%	0 sf	0.00%	
11:45 AM	4,985 sf	5.72%	0 sf	0.00%	
12:00 PM	4,796 sf	5.51%	0 sf	0.00%	
12:15 PM	4,613 sf	5.30%	0 sf	0.00%	
12:30 PM	4,431 sf	5.09%	0 sf	0.00%	
12:45 PM	4,341 sf	4.98%	0 sf	0.00%	
1:00 PM	4,541 sf	5.21%	0 sf	0.00%	
1:15 PM	4,738 sf	5.44%	0 sf	0.00%	
1:30 PM	4,926 sf	5.65%	0 sf	0.00%	
1:45 PM	5,135 sf	5.89%	0 sf	0.00%	
2:00 PM	5,340 sf	6.13%	0 sf	0.00%	
2:15 PM	5,552 sf	6.37%	0 sf	0.00%	
2:30 PM	5,727 sf	6.57%	0 sf	0.00%	
2:45 PM	5,966 sf	6.85%	0 sf	0.00%	
3:00 PM	6,182 sf	7.10%	0 sf	0.00%	
3:15 PM	6,460 sf	7.42%	0 sf	0.00%	
3:30 PM	6,727 sf	7.72%	0 sf	0.00%	
3:45 PM	7,066 sf	8.11%	0 sf	0.00%	
4:00 PM	7,407 sf	8.50%	0 sf	0.00%	
4:15 PM	7,852 sf	9.01%	143 sf	0.16%	
4:30 PM	8,332 sf	9.56%	511 sf	0.59%	
4:45 PM	8,956 sf	10.28%	1,221 sf	1.40%	
5:00 PM	9,677 sf	11.11%	2,395 sf	2.75%	
5:15 PM	10,670 sf	12.25%	4,275 sf	4.91%	
5:30 PM	12,408 sf	14.24%	7,222 sf	8.29%	
5:45 PM	15,944 sf	18.30%	12,848 sf	14.75%	
5:58 PM	21,172 sf	24.30%	22,202 sf	25.48%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

OCTOBER 4

Mirror date: March 8
Analysis hours: 8:09 AM-5:47 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:09 AM	46,677 sf	53.58%	6,434 sf	7.39%	
8:15 AM	40,180 sf	46.12%	6,501 sf	7.46%	
8:30 AM	28,410 sf	32.61%	5,559 sf	6.38%	
8:45 AM	21,439 sf	24.61%	4,472 sf	5.13%	
9:00 AM	15,853 sf	18.20%	3,693 sf	4.24%	
9:15 AM	11,527 sf	13.23%	3,094 sf	3.55%	
9:30 AM	8,163 sf	9.37%	2,599 sf	2.98%	
9:45 AM	7,075 sf	8.12%	1,070 sf	1.23%	
10:00 AM	6,698 sf	7.69%	0 sf	0.00%	
10:15 AM	6,372 sf	7.31%	0 sf	0.00%	
10:30 AM	6,088 sf	6.99%	0 sf	0.00%	
10:45 AM	5,824 sf	6.69%	0 sf	0.00%	
11:00 AM	5,583 sf	6.41%	0 sf	0.00%	
11:15 AM	5,360 sf	6.15%	0 sf	0.00%	
11:30 AM	5,154 sf	5.92%	0 sf	0.00%	
11:45 AM	4,957 sf	5.69%	0 sf	0.00%	
12:00 PM	4,789 sf	5.50%	0 sf	0.00%	
12:15 PM	4,620 sf	5.30%	0 sf	0.00%	
12:30 PM	4,443 sf	5.10%	0 sf	0.00%	
12:45 PM	4,424 sf	5.08%	0 sf	0.00%	
1:00 PM	4,643 sf	5.33%	0 sf	0.00%	
1:15 PM	4,875 sf	5.60%	0 sf	0.00%	
1:30 PM	5,088 sf	5.84%	0 sf	0.00%	
1:45 PM	5,312 sf	6.10%	0 sf	0.00%	
2:00 PM	5,537 sf	6.36%	0 sf	0.00%	
2:15 PM	5,795 sf	6.65%	0 sf	0.00%	
2:30 PM	6,050 sf	6.94%	0 sf	0.00%	
2:45 PM	6,350 sf	7.29%	0 sf	0.00%	
3:00 PM	6,654 sf	7.64%	0 sf	0.00%	
3:15 PM	7,007 sf	8.04%	0 sf	0.00%	
3:30 PM	7,384 sf	8.48%	0 sf	0.00%	
3:45 PM	7,820 sf	8.98%	0 sf	0.00%	
4:00 PM	8,307 sf	9.53%	119 sf	0.14%	
4:15 PM	8,892 sf	10.21%	440 sf	0.51%	
4:30 PM	9,517 sf	10.92%	1,000 sf	1.15%	
4:45 PM	10,337 sf	11.87%	2,078 sf	2.38%	
5:00 PM	11,321 sf	12.99%	3,797 sf	4.36%	
5:15 PM	13,160 sf	15.11%	6,402 sf	7.35%	
5:30 PM	16,396 sf	18.82%	11,567 sf	13.28%	
5:47 PM	23,202 sf	26.63%	23,546 sf	27.03%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

OCTOBER 11

Mirror date: March 1
Analysis hours: 8:16 AM-5:37 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:16 AM	47,593 sf	54.63%	6,445 sf	7.40%	
8:30 AM	31,988 sf	36.72%	5,996 sf	6.88%	
8:45 AM	23,183 sf	26.61%	4,817 sf	5.53%	
9:00 AM	17,155 sf	19.69%	3,926 sf	4.51%	
9:15 AM	12,468 sf	14.31%	3,266 sf	3.75%	
9:30 AM	8,774 sf	10.07%	2,746 sf	3.15%	
9:45 AM	7,044 sf	8.09%	1,531 sf	1.76%	
10:00 AM	6,662 sf	7.65%	24 sf	0.03%	
10:15 AM	6,337 sf	7.27%	0 sf	0.00%	
10:30 AM	6,058 sf	6.95%	0 sf	0.00%	
10:45 AM	5,801 sf	6.66%	0 sf	0.00%	
11:00 AM	5,559 sf	6.38%	0 sf	0.00%	
11:15 AM	5,335 sf	6.12%	0 sf	0.00%	
11:30 AM	5,131 sf	5.89%	0 sf	0.00%	
11:45 AM	4,938 sf	5.67%	0 sf	0.00%	
12:00 PM	4,769 sf	5.47%	0 sf	0.00%	
12:15 PM	4,596 sf	5.28%	0 sf	0.00%	
12:30 PM	4,406 sf	5.06%	0 sf	0.00%	
12:45 PM	4,524 sf	5.19%	0 sf	0.00%	
1:00 PM	4,743 sf	5.44%	0 sf	0.00%	
1:15 PM	4,969 sf	5.70%	0 sf	0.00%	
1:30 PM	5,188 sf	5.96%	0 sf	0.00%	
1:45 PM	5,424 sf	6.23%	0 sf	0.00%	
2:00 PM	5,675 sf	6.51%	0 sf	0.00%	
2:15 PM	5,950 sf	6.83%	0 sf	0.00%	
2:30 PM	6,247 sf	7.17%	0 sf	0.00%	
2:45 PM	6,560 sf	7.53%	0 sf	0.00%	
3:00 PM	6,900 sf	7.92%	0 sf	0.00%	
3:15 PM	7,286 sf	8.36%	0 sf	0.00%	
3:30 PM	7,703 sf	8.84%	1 sf	0.00%	
3:45 PM	8,189 sf	9.40%	73 sf	0.08%	
4:00 PM	8,745 sf	10.04%	319 sf	0.37%	
4:15 PM	9,415 sf	10.81%	762 sf	0.87%	
4:30 PM	10,214 sf	11.72%	1,657 sf	1.90%	
4:45 PM	11,226 sf	12.89%	3,291 sf	3.78%	
5:00 PM	12,880 sf	14.78%	5,580 sf	6.41%	
5:15 PM	15,792 sf	18.13%	10,343 sf	11.87%	
5:30 PM	20,669 sf	23.72%	18,729 sf	21.50%	
5:37 PM	24,126 sf	27.69%	23,682 sf	27.18%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

OCTOBER 18

Mirror date: February 22
Analysis hours: 8:22 AM-5:27 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:22 AM	49,356 sf	56.65%	6,407 sf	7.35%	
8:30 AM	39,444 sf	45.28%	6,313 sf	7.25%	
8:45 AM	26,211 sf	30.09%	5,247 sf	6.02%	
9:00 AM	18,682 sf	21.44%	4,215 sf	4.84%	
9:15 AM	13,562 sf	15.57%	3,469 sf	3.98%	
9:30 AM	9,551 sf	10.96%	2,890 sf	3.32%	
9:45 AM	7,027 sf	8.07%	2,062 sf	2.37%	
10:00 AM	6,625 sf	7.60%	188 sf	0.22%	
10:15 AM	6,299 sf	7.23%	0 sf	0.00%	
10:30 AM	6,024 sf	6.91%	0 sf	0.00%	
10:45 AM	5,767 sf	6.62%	0 sf	0.00%	
11:00 AM	5,537 sf	6.36%	0 sf	0.00%	
11:15 AM	5,315 sf	6.10%	0 sf	0.00%	
11:30 AM	5,111 sf	5.87%	0 sf	0.00%	
11:45 AM	4,923 sf	5.65%	0 sf	0.00%	
12:00 PM	4,755 sf	5.46%	0 sf	0.00%	
12:15 PM	4,595 sf	5.27%	0 sf	0.00%	
12:30 PM	4,416 sf	5.07%	0 sf	0.00%	
12:45 PM	4,591 sf	5.27%	0 sf	0.00%	
1:00 PM	4,820 sf	5.53%	0 sf	0.00%	
1:15 PM	5,051 sf	5.80%	0 sf	0.00%	
1:30 PM	5,281 sf	6.06%	0 sf	0.00%	
1:45 PM	5,528 sf	6.35%	0 sf	0.00%	
2:00 PM	5,787 sf	6.64%	0 sf	0.00%	
2:15 PM	6,079 sf	6.98%	0 sf	0.00%	
2:30 PM	6,391 sf	7.34%	0 sf	0.00%	
2:45 PM	6,728 sf	7.72%	0 sf	0.00%	
3:00 PM	7,097 sf	8.15%	0 sf	0.00%	
3:15 PM	7,511 sf	8.62%	0 sf	0.00%	
3:30 PM	7,978 sf	9.16%	15 sf	0.02%	
3:45 PM	8,511 sf	9.77%	190 sf	0.22%	
4:00 PM	9,128 sf	10.48%	492 sf	0.57%	
4:15 PM	9,887 sf	11.35%	1,215 sf	1.39%	
4:30 PM	10,804 sf	12.40%	2,651 sf	3.04%	
4:45 PM	12,255 sf	14.07%	4,803 sf	5.51%	
5:00 PM	14,625 sf	16.79%	8,955 sf	10.28%	
5:15 PM	18,254 sf	20.95%	15,624 sf	17.93%	
5:27 PM	24,202 sf	27.78%	22,907 sf	26.29%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

OCTOBER 25

Mirror date: February 15
Analysis hours: 7:30 AM-4:18 PM (PST)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:30 AM	51,336 sf	58.93%	5,893 sf	6.76%	
7:45 AM	32,576 sf	37.39%	5,790 sf	6.65%	
8:00 AM	21,547 sf	24.73%	4,568 sf	5.24%	
8:15 AM	14,922 sf	17.13%	3,712 sf	4.26%	
8:30 AM	10,530 sf	12.09%	3,061 sf	3.51%	
8:45 AM	7,289 sf	8.37%	2,511 sf	2.88%	
9:00 AM	6,606 sf	7.58%	571 sf	0.66%	
9:15 AM	6,272 sf	7.20%	0 sf	0.00%	
9:30 AM	6,002 sf	6.89%	0 sf	0.00%	
9:45 AM	5,744 sf	6.59%	0 sf	0.00%	
10:00 AM	5,513 sf	6.33%	0 sf	0.00%	
10:15 AM	5,299 sf	6.08%	0 sf	0.00%	
10:30 AM	5,090 sf	5.84%	0 sf	0.00%	
10:45 AM	4,910 sf	5.64%	0 sf	0.00%	
11:00 AM	4,749 sf	5.45%	0 sf	0.00%	
11:15 AM	4,593 sf	5.27%	0 sf	0.00%	
11:30 AM	4,439 sf	5.10%	0 sf	0.00%	
11:45 AM	4,654 sf	5.34%	0 sf	0.00%	
12:00 PM	4,885 sf	5.61%	0 sf	0.00%	
12:15 PM	5,128 sf	5.89%	0 sf	0.00%	
12:30 PM	5,367 sf	6.16%	0 sf	0.00%	
12:45 PM	5,624 sf	6.46%	0 sf	0.00%	
1:00 PM	5,896 sf	6.77%	0 sf	0.00%	
1:15 PM	6,202 sf	7.12%	0 sf	0.00%	
1:30 PM	6,528 sf	7.49%	0 sf	0.00%	
1:45 PM	6,893 sf	7.91%	0 sf	0.00%	
2:00 PM	7,282 sf	8.36%	0 sf	0.00%	
2:15 PM	7,731 sf	8.87%	0 sf	0.00%	
2:30 PM	8,229 sf	9.45%	97 sf	0.11%	
2:45 PM	8,819 sf	10.12%	291 sf	0.33%	
3:00 PM	9,500 sf	10.90%	715 sf	0.82%	
3:15 PM	10,350 sf	11.88%	1,914 sf	2.20%	
3:30 PM	11,536 sf	13.24%	3,813 sf	4.38%	
3:45 PM	13,493 sf	15.49%	7,533 sf	8.65%	
4:00 PM	16,681 sf	19.15%	13,991 sf	16.06%	
4:15 PM	22,420 sf	25.73%	20,793 sf	23.87%	
4:18 PM	24,096 sf	27.66%	21,706 sf	24.92%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 1

Mirror date: February 8
Analysis hours: 7:36 AM-4:10 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:36 AM	53,393 sf	61.29%	5,303 sf	6.09%	
7:45 AM	41,612 sf	47.76%	5,811 sf	6.67%	
8:00 AM	27,149 sf	31.16%	5,000 sf	5.74%	
8:15 AM	17,945 sf	20.60%	4,002 sf	4.59%	
8:30 AM	11,806 sf	13.55%	3,269 sf	3.75%	
8:45 AM	8,030 sf	9.22%	2,706 sf	3.11%	
9:00 AM	6,601 sf	7.58%	1,129 sf	1.30%	
9:15 AM	6,254 sf	7.18%	0 sf	0.00%	
9:30 AM	5,977 sf	6.86%	0 sf	0.00%	
9:45 AM	5,727 sf	6.57%	0 sf	0.00%	
10:00 AM	5,495 sf	6.31%	0 sf	0.00%	
10:15 AM	5,284 sf	6.06%	0 sf	0.00%	
10:30 AM	5,080 sf	5.83%	0 sf	0.00%	
10:45 AM	4,898 sf	5.62%	0 sf	0.00%	
11:00 AM	4,748 sf	5.45%	0 sf	0.00%	
11:15 AM	4,591 sf	5.27%	0 sf	0.00%	
11:30 AM	4,485 sf	5.15%	0 sf	0.00%	
11:45 AM	4,705 sf	5.40%	0 sf	0.00%	
12:00 PM	4,947 sf	5.68%	0 sf	0.00%	
12:15 PM	5,195 sf	5.96%	0 sf	0.00%	
12:30 PM	5,445 sf	6.25%	0 sf	0.00%	
12:45 PM	5,714 sf	6.56%	0 sf	0.00%	
1:00 PM	5,988 sf	6.87%	0 sf	0.00%	
1:15 PM	6,314 sf	7.25%	0 sf	0.00%	
1:30 PM	6,654 sf	7.64%	0 sf	0.00%	
1:45 PM	7,036 sf	8.08%	0 sf	0.00%	
2:00 PM	7,451 sf	8.55%	0 sf	0.00%	
2:15 PM	7,934 sf	9.11%	28 sf	0.03%	
2:30 PM	8,468 sf	9.72%	119 sf	0.14%	
2:45 PM	9,107 sf	10.45%	266 sf	0.31%	
3:00 PM	9,853 sf	11.31%	1,111 sf	1.27%	
3:15 PM	10,863 sf	12.47%	2,800 sf	3.21%	
3:30 PM	12,362 sf	14.19%	5,846 sf	6.71%	
3:45 PM	14,775 sf	16.96%	11,579 sf	13.29%	
4:00 PM	19,191 sf	22.03%	17,790 sf	20.42%	
4:10 PM	24,483 sf	28.10%	19,556 sf	22.45%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 8

Mirror date: February 1
Analysis hours: 7:43 AM-4:03 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:43 AM	55,430 sf	63.63%	4,886 sf	5.61%	
7:45 AM	53,511 sf	61.42%	5,070 sf	5.82%	
8:00 AM	34,979 sf	40.15%	5,259 sf	6.04%	
8:15 AM	23,271 sf	26.71%	4,374 sf	5.02%	
8:30 AM	14,809 sf	17.00%	3,524 sf	4.05%	
8:45 AM	9,424 sf	10.82%	2,883 sf	3.31%	
9:00 AM	6,613 sf	7.59%	1,811 sf	2.08%	
9:15 AM	6,252 sf	7.18%	25 sf	0.03%	
9:30 AM	5,968 sf	6.85%	0 sf	0.00%	
9:45 AM	5,720 sf	6.57%	0 sf	0.00%	
10:00 AM	5,492 sf	6.30%	0 sf	0.00%	
10:15 AM	5,276 sf	6.06%	0 sf	0.00%	
10:30 AM	5,077 sf	5.83%	0 sf	0.00%	
10:45 AM	4,901 sf	5.63%	0 sf	0.00%	
11:00 AM	4,755 sf	5.46%	0 sf	0.00%	
11:15 AM	4,604 sf	5.28%	0 sf	0.00%	
11:30 AM	4,514 sf	5.18%	0 sf	0.00%	
11:45 AM	4,744 sf	5.45%	0 sf	0.00%	
12:00 PM	4,994 sf	5.73%	0 sf	0.00%	
12:15 PM	5,251 sf	6.03%	0 sf	0.00%	
12:30 PM	5,503 sf	6.32%	0 sf	0.00%	
12:45 PM	5,784 sf	6.64%	0 sf	0.00%	
1:00 PM	6,066 sf	6.96%	0 sf	0.00%	
1:15 PM	6,401 sf	7.35%	0 sf	0.00%	
1:30 PM	6,760 sf	7.76%	0 sf	0.00%	
1:45 PM	7,173 sf	8.23%	0 sf	0.00%	
2:00 PM	7,601 sf	8.72%	0 sf	0.00%	
2:15 PM	8,104 sf	9.30%	16 sf	0.02%	
2:30 PM	8,672 sf	9.95%	83 sf	0.10%	
2:45 PM	9,355 sf	10.74%	377 sf	0.43%	
3:00 PM	10,167 sf	11.67%	1,621 sf	1.86%	
3:15 PM	11,341 sf	13.02%	4,143 sf	4.76%	
3:30 PM	13,065 sf	15.00%	8,806 sf	10.11%	
3:45 PM	16,324 sf	18.74%	14,673 sf	16.84%	
4:00 PM	24,209 sf	27.79%	17,105 sf	19.63%	
4:03 PM	27,281 sf	31.31%	16,856 sf	19.35%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 15

Mirror date: January 25
Analysis hours: 7:51 AM-3:57 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:51 AM	57,456 sf	65.95%	4,431 sf	5.09%	
8:00 AM	44,494 sf	51.07%	5,133 sf	5.89%	
8:15 AM	29,993 sf	34.43%	4,572 sf	5.25%	
8:30 AM	19,421 sf	22.29%	3,823 sf	4.39%	
8:45 AM	12,326 sf	14.15%	3,104 sf	3.56%	
9:00 AM	7,383 sf	8.47%	2,508 sf	2.88%	
9:15 AM	6,271 sf	7.20%	368 sf	0.42%	
9:30 AM	5,967 sf	6.85%	0 sf	0.00%	
9:45 AM	5,723 sf	6.57%	0 sf	0.00%	
10:00 AM	5,494 sf	6.31%	0 sf	0.00%	
10:15 AM	5,282 sf	6.06%	0 sf	0.00%	
10:30 AM	5,082 sf	5.83%	0 sf	0.00%	
10:45 AM	4,904 sf	5.63%	0 sf	0.00%	
11:00 AM	4,764 sf	5.47%	0 sf	0.00%	
11:15 AM	4,619 sf	5.30%	0 sf	0.00%	
11:30 AM	4,538 sf	5.21%	0 sf	0.00%	
11:45 AM	4,772 sf	5.48%	0 sf	0.00%	
12:00 PM	5,029 sf	5.77%	0 sf	0.00%	
12:15 PM	5,292 sf	6.07%	0 sf	0.00%	
12:30 PM	5,552 sf	6.37%	0 sf	0.00%	
12:45 PM	5,835 sf	6.70%	0 sf	0.00%	
1:00 PM	6,127 sf	7.03%	0 sf	0.00%	
1:15 PM	6,471 sf	7.43%	0 sf	0.00%	
1:30 PM	6,838 sf	7.85%	0 sf	0.00%	
1:45 PM	7,253 sf	8.33%	0 sf	0.00%	
2:00 PM	7,709 sf	8.85%	0 sf	0.00%	
2:15 PM	8,235 sf	9.45%	4 sf	0.00%	
2:30 PM	8,834 sf	10.14%	54 sf	0.06%	
2:45 PM	9,552 sf	10.96%	602 sf	0.69%	
3:00 PM	10,422 sf	11.96%	2,338 sf	2.68%	
3:15 PM	11,766 sf	13.51%	5,933 sf	6.81%	
3:30 PM	13,946 sf	16.01%	11,220 sf	12.88%	
3:45 PM	19,955 sf	22.91%	14,991 sf	17.21%	
3:57 PM	31,138 sf	35.74%	14,108 sf	16.19%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 22

Mirror date: January 18
Analysis hours: 7:57 AM-3:54 PM (PST)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:57 AM	59,462 sf	68.25%	4,024 sf	4.62%	
8:00 AM	56,106 sf	64.40%	4,258 sf	4.89%	
8:15 AM	37,839 sf	43.43%	4,598 sf	5.28%	
8:30 AM	25,145 sf	28.86%	4,022 sf	4.62%	
8:45 AM	16,356 sf	18.77%	3,360 sf	3.86%	
9:00 AM	9,898 sf	11.36%	2,721 sf	3.12%	
9:15 AM	7,077 sf	8.12%	1,031 sf	1.18%	
9:30 AM	6,019 sf	6.91%	0 sf	0.00%	
9:45 AM	5,735 sf	6.58%	0 sf	0.00%	
10:00 AM	5,508 sf	6.32%	0 sf	0.00%	
10:15 AM	5,293 sf	6.08%	0 sf	0.00%	
10:30 AM	5,094 sf	5.85%	0 sf	0.00%	
10:45 AM	4,921 sf	5.65%	0 sf	0.00%	
11:00 AM	4,782 sf	5.49%	0 sf	0.00%	
11:15 AM	4,642 sf	5.33%	0 sf	0.00%	
11:30 AM	4,551 sf	5.22%	0 sf	0.00%	
11:45 AM	4,786 sf	5.49%	0 sf	0.00%	
12:00 PM	5,042 sf	5.79%	0 sf	0.00%	
12:15 PM	5,311 sf	6.10%	0 sf	0.00%	
12:30 PM	5,580 sf	6.40%	0 sf	0.00%	
12:45 PM	5,869 sf	6.74%	0 sf	0.00%	
1:00 PM	6,165 sf	7.08%	0 sf	0.00%	
1:15 PM	6,509 sf	7.47%	0 sf	0.00%	
1:30 PM	6,887 sf	7.90%	0 sf	0.00%	
1:45 PM	7,318 sf	8.40%	0 sf	0.00%	
2:00 PM	7,785 sf	8.94%	0 sf	0.00%	
2:15 PM	8,321 sf	9.55%	0 sf	0.00%	
2:30 PM	8,937 sf	10.26%	31 sf	0.04%	
2:45 PM	9,680 sf	11.11%	824 sf	0.95%	
3:00 PM	10,624 sf	12.20%	3,146 sf	3.61%	
3:15 PM	12,246 sf	14.06%	7,550 sf	8.67%	
3:30 PM	15,814 sf	18.15%	12,449 sf	14.29%	
3:45 PM	24,777 sf	28.44%	13,761 sf	15.80%	
3:54 PM	34,860 sf	40.01%	11,627 sf	13.35%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 29

Mirror date: January 11
Analysis hours: 8:04 AM-3:51 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:04 AM	60,975 sf	69.99%	3,790 sf	4.35%	
8:15 AM	46,327 sf	53.18%	4,521 sf	5.19%	
8:30 AM	31,415 sf	36.06%	4,084 sf	4.69%	
8:45 AM	20,984 sf	24.09%	3,555 sf	4.08%	
9:00 AM	13,129 sf	15.07%	2,935 sf	3.37%	
9:15 AM	8,485 sf	9.74%	1,824 sf	2.09%	
9:30 AM	6,811 sf	7.82%	0 sf	0.00%	
9:45 AM	5,872 sf	6.74%	0 sf	0.00%	
10:00 AM	5,532 sf	6.35%	0 sf	0.00%	
10:15 AM	5,316 sf	6.10%	0 sf	0.00%	
10:30 AM	5,117 sf	5.87%	0 sf	0.00%	
10:45 AM	4,940 sf	5.67%	0 sf	0.00%	
11:00 AM	4,804 sf	5.51%	0 sf	0.00%	
11:15 AM	4,670 sf	5.36%	0 sf	0.00%	
11:30 AM	4,546 sf	5.22%	0 sf	0.00%	
11:45 AM	4,759 sf	5.46%	0 sf	0.00%	
12:00 PM	5,000 sf	5.74%	0 sf	0.00%	
12:15 PM	5,294 sf	6.08%	0 sf	0.00%	
12:30 PM	5,585 sf	6.41%	0 sf	0.00%	
12:45 PM	5,879 sf	6.75%	0 sf	0.00%	
1:00 PM	6,178 sf	7.09%	0 sf	0.00%	
1:15 PM	6,517 sf	7.48%	0 sf	0.00%	
1:30 PM	6,904 sf	7.92%	0 sf	0.00%	
1:45 PM	7,335 sf	8.42%	0 sf	0.00%	
2:00 PM	7,810 sf	8.96%	0 sf	0.00%	
2:15 PM	8,358 sf	9.59%	0 sf	0.00%	
2:30 PM	8,980 sf	10.31%	24 sf	0.03%	
2:45 PM	9,745 sf	11.19%	1,069 sf	1.23%	
3:00 PM	10,930 sf	12.55%	3,847 sf	4.42%	
3:15 PM	13,003 sf	14.93%	8,515 sf	9.77%	
3:30 PM	17,870 sf	20.51%	12,500 sf	14.35%	
3:45 PM	29,585 sf	33.96%	12,017 sf	13.79%	
3:51 PM	38,226 sf	43.88%	9,782 sf	11.23%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

DECEMBER 6

Mirror date: January 4
Analysis hours: 8:10 AM-3:51 PM (PST)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:10 AM	62,077 sf	71.25%	3,623 sf	4.16%	
8:15 AM	55,171 sf	63.33%	3,964 sf	4.55%	
8:30 AM	37,834 sf	43.43%	4,133 sf	4.74%	
8:45 AM	25,717 sf	29.52%	3,623 sf	4.16%	
9:00 AM	16,650 sf	19.11%	3,157 sf	3.62%	
9:15 AM	10,386 sf	11.92%	2,530 sf	2.90%	
9:30 AM	7,843 sf	9.00%	260 sf	0.30%	
9:45 AM	6,564 sf	7.53%	0 sf	0.00%	
10:00 AM	5,653 sf	6.49%	0 sf	0.00%	
10:15 AM	5,348 sf	6.14%	0 sf	0.00%	
10:30 AM	5,150 sf	5.91%	0 sf	0.00%	
10:45 AM	4,967 sf	5.70%	0 sf	0.00%	
11:00 AM	4,834 sf	5.55%	0 sf	0.00%	
11:15 AM	4,701 sf	5.40%	0 sf	0.00%	
11:30 AM	4,542 sf	5.21%	0 sf	0.00%	
11:45 AM	4,757 sf	5.46%	0 sf	0.00%	
12:00 PM	5,024 sf	5.77%	0 sf	0.00%	
12:15 PM	5,298 sf	6.08%	0 sf	0.00%	
12:30 PM	5,573 sf	6.40%	0 sf	0.00%	
12:45 PM	5,859 sf	6.72%	0 sf	0.00%	
1:00 PM	6,163 sf	7.07%	0 sf	0.00%	
1:15 PM	6,497 sf	7.46%	0 sf	0.00%	
1:30 PM	6,881 sf	7.90%	0 sf	0.00%	
1:45 PM	7,318 sf	8.40%	0 sf	0.00%	
2:00 PM	7,793 sf	8.95%	0 sf	0.00%	
2:15 PM	8,341 sf	9.57%	0 sf	0.00%	
2:30 PM	8,961 sf	10.29%	23 sf	0.03%	
2:45 PM	9,870 sf	11.33%	1,182 sf	1.36%	
3:00 PM	11,182 sf	12.83%	4,220 sf	4.84%	
3:15 PM	13,645 sf	15.66%	8,831 sf	10.14%	
3:30 PM	19,347 sf	22.21%	12,156 sf	13.95%	
3:45 PM	32,446 sf	37.24%	10,874 sf	12.48%	
3:51 PM	41,983 sf	48.19%	7,815 sf	8.97%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

DECEMBER 13

Mirror date: December 28
Analysis hours: 8:15 AM-3:52 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:15 AM	62,797 sf	72.08%	3,498 sf	4.02%	
8:30 AM	44,071 sf	50.59%	4,120 sf	4.73%	
8:45 AM	30,241 sf	34.71%	3,724 sf	4.27%	
9:00 AM	19,954 sf	22.90%	3,236 sf	3.71%	
9:15 AM	12,851 sf	14.75%	2,723 sf	3.13%	
9:30 AM	8,805 sf	10.11%	869 sf	1.00%	
9:45 AM	7,255 sf	8.33%	0 sf	0.00%	
10:00 AM	6,109 sf	7.01%	0 sf	0.00%	
10:15 AM	5,439 sf	6.24%	0 sf	0.00%	
10:30 AM	5,186 sf	5.95%	0 sf	0.00%	
10:45 AM	4,998 sf	5.74%	0 sf	0.00%	
11:00 AM	4,857 sf	5.58%	0 sf	0.00%	
11:15 AM	4,731 sf	5.43%	0 sf	0.00%	
11:30 AM	4,548 sf	5.22%	0 sf	0.00%	
11:45 AM	4,709 sf	5.40%	0 sf	0.00%	
12:00 PM	4,976 sf	5.71%	0 sf	0.00%	
12:15 PM	5,253 sf	6.03%	0 sf	0.00%	
12:30 PM	5,528 sf	6.35%	0 sf	0.00%	
12:45 PM	5,821 sf	6.68%	0 sf	0.00%	
1:00 PM	6,123 sf	7.03%	0 sf	0.00%	
1:15 PM	6,454 sf	7.41%	0 sf	0.00%	
1:30 PM	6,831 sf	7.84%	0 sf	0.00%	
1:45 PM	7,258 sf	8.33%	0 sf	0.00%	
2:00 PM	7,731 sf	8.87%	0 sf	0.00%	
2:15 PM	8,270 sf	9.49%	0 sf	0.00%	
2:30 PM	8,933 sf	10.25%	0 sf	0.00%	
2:45 PM	9,859 sf	11.32%	1,062 sf	1.22%	
3:00 PM	11,281 sf	12.95%	4,068 sf	4.67%	
3:15 PM	13,808 sf	15.85%	8,530 sf	9.79%	
3:30 PM	19,540 sf	22.43%	11,753 sf	13.49%	
3:45 PM	32,452 sf	37.25%	10,549 sf	12.11%	
3:52 PM	44,996 sf	51.65%	6,232 sf	7.15%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

DECEMBER 20

Winter solstice (December 21 similar)
Analysis hours: 8:19 AM-3:54 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:19 AM	63,052 sf	72.37%	3,457 sf	3.97%	
8:30 AM	49,142 sf	56.41%	4,080 sf	4.68%	
8:45 AM	34,003 sf	39.03%	3,810 sf	4.37%	
9:00 AM	22,611 sf	25.95%	3,341 sf	3.83%	
9:15 AM	14,836 sf	17.03%	2,875 sf	3.30%	
9:30 AM	9,679 sf	11.11%	1,488 sf	1.71%	
9:45 AM	7,787 sf	8.94%	0 sf	0.00%	
10:00 AM	6,454 sf	7.41%	0 sf	0.00%	
10:15 AM	5,621 sf	6.45%	0 sf	0.00%	
10:30 AM	5,229 sf	6.00%	0 sf	0.00%	
10:45 AM	5,039 sf	5.78%	0 sf	0.00%	
11:00 AM	4,883 sf	5.61%	0 sf	0.00%	
11:15 AM	4,765 sf	5.47%	0 sf	0.00%	
11:30 AM	4,623 sf	5.31%	0 sf	0.00%	
11:45 AM	4,656 sf	5.34%	0 sf	0.00%	
12:00 PM	4,923 sf	5.65%	0 sf	0.00%	
12:15 PM	5,200 sf	5.97%	0 sf	0.00%	
12:30 PM	5,472 sf	6.28%	0 sf	0.00%	
12:45 PM	5,762 sf	6.61%	0 sf	0.00%	
1:00 PM	6,064 sf	6.96%	0 sf	0.00%	
1:15 PM	6,389 sf	7.33%	0 sf	0.00%	
1:30 PM	6,753 sf	7.75%	0 sf	0.00%	
1:45 PM	7,175 sf	8.24%	0 sf	0.00%	
2:00 PM	7,635 sf	8.76%	0 sf	0.00%	
2:15 PM	8,165 sf	9.37%	0 sf	0.00%	
2:30 PM	8,816 sf	10.12%	0 sf	0.00%	
2:45 PM	9,715 sf	11.15%	772 sf	0.89%	
3:00 PM	11,060 sf	12.70%	3,478 sf	3.99%	
3:15 PM	13,417 sf	15.40%	7,731 sf	8.87%	
3:30 PM	18,450 sf	21.18%	11,434 sf	13.12%	
3:45 PM	30,188 sf	34.65%	10,821 sf	12.42%	
3:54 PM	46,296 sf	53.14%	5,558 sf	6.38%	

EXHIBIT E

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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November 14, 2025

Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

Subject: **Comments on the Family Zoning Plan – Housing Element Rezoning Program (SCH No. 2021060358)**

Dear Mr. Drury,

We have reviewed the September 2025 Addendum No. 1 to Environmental Impact Report ("Addendum") and the November 2022 Final Environmental Impact Report ("FEIR") for the Family Zoning Plan – Housing Element Rezoning Program ("Project") located in the City of San Francisco ("City"). The Addendum proposes to develop an additional 4,000 housing units to bring the total units under the Family Zoning Plan to 54,000 housing units.

Our review concludes that the Addendum fails to adequately evaluate the Project's hazards, hazardous materials, and air quality impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A subsequent Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential hazards, hazardous materials, and air quality impacts that the project may have on the environment.

Hazards and Hazardous Materials

Inadequate Disclosure and Analysis of Impacts

The Addendum and FEIR do not mention the newly passed AB 130 which mandates that hazardous waste sites be addressed through the completion of a Phase I Environmental Site Assessments ("ESAs"). AB 130 states: [1]

> "The development can proceed as a "use by right" if, [among other provisions],

[1] "Assembly Bill No. 130." California State Legislature, 2025, *available at:* https://legiscan.com/CA/text/AB130/id/3258333

(13) (A) The development proponent completes a Phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code, and a Phase II environmental assessment, as defined in subdivision (o) of Section 25403 of the Health and Safety Code, if warranted.

(B) If a recognized environmental condition is found, the development proponent shall undertake a preliminary endangerment assessment, as defined in Section 78095 of the Health and Safety Code, prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity.

(i) If a release of hazardous substance is found to exist on the site, the release shall be removed, or any significant effect of the release shall be mitigated to a level of insignificance in compliance with state and federal requirements.

(ii) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with current state and federal requirements."

These requirements are not mentioned in the Addendum or FEIR. There are thousands of hazardous waste sites in San Francisco. According to the FEIR, there are 2,000 Maher sites and 2,300 Cortese List sites within San Francisco (p. 4.1-219) [2]. All Maher- and Cortese-listed sites that will be subject to development under this Project will need to undergo a Phase I ESA according to the AB 130 text cited above.

Phase I ESAs are conducted to identify if any recognized environmental conditions are found that would potentially pose a health risk to construction workers or for future residents. If a recognized environmental condition is found, a more detailed preliminary endangerment assessment is required to identify any hazardous substance release.

A subsequent EIR should be prepared to include specific mitigation measures for dealing with Maher- and Cortese-listed sites in a manner consistent with AB 130. These mitigation measures must include provisions for conducting Phase I ESAs and, if recognized conditions are found, Phase II ESAs so that the health of construction workers, future occupants and workers is protected.

[2] The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with the California Environmental Quality Act requirements in providing information about the location of hazardous materials release sites. Government Code section 65962.5 requires the California Environmental Protection Agencyopens in a new window to develop at least annually an updated Cortese List. DTSC is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List. https://dtsc.ca.gov/dtscs-cortese-list/

Air Quality

Failure to Quantify and Adequately Evaluate Criteria Air Pollutant Emissions

The Addendum fails to quantify the criteria air pollutant emissions associated with Project construction and operation. Rather, in regard to the proposed Project's construction-related air quality impacts, the Addendum states:

> "The proposed rezoning program and subsequent development is expected to result in the same significant criteria air pollutant impacts from construction but not substantially more severe impacts than those disclosed in the EIR" (p. 93).

Similarly, in regard to the Project's operational air quality impacts, the Addendum states:

> "The conclusion in the FEIR is that total operational emissions for future development would be below the air district's thresholds of significance for all pollutants. That conclusion also applies to the proposed rezoning program. Operational emissions would not exceed any thresholds for any representative building type that would be constructed under the proposed rezoning program, and the impact would be less than significant" (p. 95).

However, relevant Bay Area Air Quality Management District ("BAAQMD") guidance supports the calculation of the Project's air pollutant emissions. The Addendum proposes to construct an additional 4,000 residential units. According to BAAQMD's screening criteria, apartments and condo-townhouse land uses must undergo further environmental review if they exceed 416 units for construction or 637/638 units for operational emissions (see table below).[3]

[3] "Screening For Criteria Air Pollutants and Precursors." BAAQMD, 2022, *available at*: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?la=en, p. 4.

Land Use Category	Land Use Subcategory	Land Use Unit	Screening Level	
			Construction	Operation
Education	Worship Place	KSF	452	642
Industrial	General Heavy Industry	KSF	452	1,009
Industrial	General Light Industry	KSF	452	998
Industrial	Industrial Park	KSF	452	1,247
Industrial	Manufacturing	KSF	452	1,009
Industrial	Warehouse[1]	KSF	452	1,423
Recreational	Arena	KSF	732	600
Recreational	City Park	Acres	10	175
Recreational	Fast Food Restaurant	KSF	452	21
Recreational	Health Club	KSF	452	261
Recreational	Hotel	Rooms	312	633
Recreational	Motel	Rooms	230	767
Recreational	Movie Theater	KSF	458	80
Recreational	Restaurant – High Turnover (Sit-Down)	KSF	452	75
Recreational	Restaurant – Quality (Fine Dining)	KSF	452	105
Recreational	Racquet Club	KSF	452	457
Recreational	Recreational Swimming Pool	KSF	452	376
Residential	Apartments	DU	416	638
Residential	Condo-Townhouse	DU	416	637
Residential	Mobile Home Park	DU	377	721
Residential	Congregate Care/Retirement Community	DU	416	1,008
Residential	Single Family Housing	DU	254	421
Retail	Auto Care Center	KSF	452	356
Retail	Convenience Market	KSF	452	11
Retail	Discount Store	KSF	452	150
Retail	Home Improvement Superstore/Hardware-Paint Store	KSF	452	221
Retail	Regional Shopping Center	KSF	452	221
Retail	Strip Mall	KSF	452	204
Retail	Supermarket	KSF	452	72

Notes: DU = dwelling unit; KSF = thousand square feet.

Furthermore, the BAAQMD indicates that if a Project includes any of the listed screening criteria, "then the lead agency would need to perform a detailed assessment of the project's criteria air pollutant and precursor emissions."[4] Thus, pursuant to relevant BAAQMD guidance, a quantitative air quality analysis should be prepared in a subsequent EIR.

Without making an effort to estimate the Project's potential construction-related and operational criteria air pollutant emissions, the Addendum lacks evidence to support the conclusion that the Project's emissions would not exceed the applicable BAAQMD significance thresholds. Until further analysis is provided, we cannot verify the Project would not result in new, significant air quality impacts already addressed in the FEIR. The Project should not be approved until a subsequent EIR is prepared to adequately assess and mitigate the potential air quality impacts that Project construction and operation may have on the surrounding environment.

SWAPE's Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to estimate construction-related and operational emissions that may result from development of the additional 4,000 housing units under the Addendum, we prepared a preliminary CalEEMod model. Our analysis provides a generalized evaluation of a range of potential residential building types. Specifically, we modeled accounting for 2,000 "Apartments Mid Rise" and 2,000

[4] "Screening For Criteria Air Pollutants and Precursors." BAAQMD, 2022, *available at*: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?la=en, p. 4.

"Condo/Townhouse High Rise" land use subtypes. Because Project-specific details such as construction schedule, equipment types, and operating parameters are not known at this time, all other values were left as default.

Our analysis estimates that the Project's construction and operational related reactive organic gases/volatile organic compounds ("ROG/VOC") emissions exceed the BAAQMD daily threshold of 54 pounds per day ("lbs/day") (see table below).

SWAPE Criteria Air Pollutant Emissions Estimates		
	Construction ROG/VOC (lbs/day)	**Operational ROG/VOC** (lbs/day)
SWAPE	148	145
BAAQMD Threshold	**54**	**54**
Exceeds?	***Yes***	***Yes***

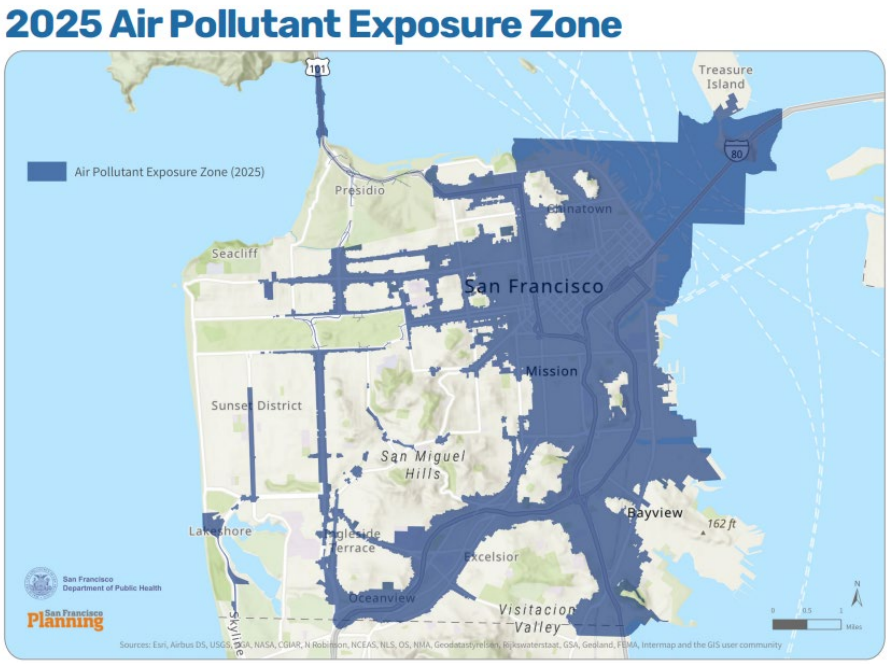
According to our analysis, the construction and operational related ROG/VOC emissions are estimated to be approximately 148 and 145 lbs/day, respectively, exceeding the BAAQMD daily threshold. This finding indicates a potentially significant air quality impact that the Addendum did not identify or address. In our opinion, a subsequent EIR should be conducted to provide a more substantial calculation of the Project's emissions and a more detailed evaluation of the Project's potential air quality impacts.

Failure to Adequately Account for Air Pollution Exposure Zones

The Addendum proposes development in the Downtown, Marina, Mission, Northeast, and Western Addition planning districts, which have areas within the City's air pollutant exposure zones ("APEZ"). The Addendum states that "the proposed rezoning program may result in a small proportion of additional rezoned parcels being in the APEZ, which could increase the number of people exposed to the generally high pollutant concentrations in the APEZ" (p. 97).

In 2025, the City identified new APEZ areas, defined as locations "where particulate matter ($PM_{2.5}$) is greater than or equal to 9 µg/m^3 or where the risk of cancer from air pollutants is greater than or equal to 100 in a million," and are displayed in the APEZ map presented below:[5]

[5] "2025 Air Pollutant Exposure Zone." San Francisco Department of Public Health, February 2025, available at: https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=216571d03e991ee3e00bc434a2415eb36eabc17a8f25a39dc8105f404b976d2f&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0.



According to the City:

> "Since 2008, San Francisco Health Code article 38 requires new residential construction projects in the APEZ to install enhanced ventilation in buildings to protect residents from the health effects of poor air quality. In addition, through the environmental review process, many construction projects in the APEZ are required to use the cleanest available construction equipment to reduce air quality impacts."[6][7]

As demonstrated above, residential projects are recommended to install enhanced ventilation in buildings. The Addendum and FEIR have failed to do so. Additionally, the Addendum concludes that the $PM_{2.5}$ and cancer risk impacts associated with the Project would be significant-and-unavoidable with mitigation, stating:

> "The maximum increases in $PM_{2.5}$ concentrations and cancer risks would not be meaningfully different than those found in the FEIR analysis, and the results would most likely still be above the air district's thresholds and thus significant and unavoidable with mitigation" (p. 97).

While we agree that the Project would result in significant air quality impacts, the Addendum's assertion that this impact is significant-and-unavoidable is unsupported. The Project proposed by the Addendum would allow further residential development within newly designated APEZ areas, which are already characterized by elevated $PM_{2.5}$ levels and an increased cancer risk. By facilitating new housing in these

[6] "Air Quality Review." San Francisco Planning, 2025, *available at:* https://sfplanning.org/air-quality#permit-anchor-3.
[7] "ARTICLE 38: Enhanced Ventilation for Urban Infill." City and County of San Francisco, December 2008, *available at: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_health/0-0-0-6054*.

areas without committing to additional mitigation, the Addendum could expose future residents to potentially significant health impacts. According to CEQA Guidelines §15096(g)(2):

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."[8]

As such, the Addendum is required under CEQA to implement all feasible mitigation to reduce impacts to a less-than-significant level. To reduce the Project's air quality impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions." The Project should not be approved until a subsequent EIR is prepared, incorporating all feasible mitigation to reduce emissions to the maximum extent possible.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

The Addendum is required under CEQA to implement all feasible mitigation to reduce the Project's potential impacts. As demonstrated above, the Project would result in potentially significant air quality impacts that should be mitigated further.

To reduce the VOC emissions associated with Project construction and operation, we recommend the Addendum consider incorporating the following mitigation measures:[9]

- Use super-compliant VOC-content architectural coatings (0 grams per liter to less than 10 grams per liter VOC) during Project construction application of paints and other architectural coatings.
- If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, or they do not reduce emissions to below thresholds, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September.

While the Project is not located in Los Angeles County, the above mitigation measures would decrease emissions regardless. Further mitigation used by other land use development projects to address VOC emissions include:[10]

[8] "Cal. Code Regs. tit. 14 § 15096." California Legislature, available at: https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-7-eir-process/section-15096-process-for-a-responsible-agency.

[9] "Mitigation Monitoring and Reporting Program." Los Angeles County Housing Element Update Program EIR. August 2021, *available at*: https://planning.lacounty.gov/wp-content/uploads/2023/07/Housing_final-peir-mitigation-monitoring.pdf.

[10] "Banning Commerce Center Project." Kimley-Horn and Associates, Inc., June 2024, *available at*: https://ceqanet.opr.ca.gov/2022090102/2; Draft Environmental Impact Report, p. 1-7.

- Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain
- Use compliant low-VOC cleaning solvents to clean paint application equipment.
- Keep all paint- and solvent-laden rags in sealed containers to prevent VOC emissions.
- Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable.
- Use high-pressure/low-volume paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.
- Manual application using a paintbrush, hand-roller, trowel, spatula, dauber, rag, or sponge, to achieve a 100 percent application efficiency.

In order to reduce the $PM_{2.5}$ and cancer risk emissions associated with the Project and recommend the Addendum consider incorporating several mitigation measures as listed below. Incorporating these measures would also reduce cumulative exposure for future residential developments proposed within APEZ zones, where pollutant concentrations are already elevated. The Southern California Association of Governments' Certified Final Program Environmental Impact Report for Connect SoCal 2024 recommends the following Project-level air quality mitigation measures: [11]

- Installing high-efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.
- Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.
- Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
- Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
- Set criteria for assessing progress in installing and replacing the enhanced filtration units,
- Develop a process for evaluating the effectiveness of the enhanced filtration units.
- Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.

[11] "Certified Final Program Environmental Impact Report for Connect SoCal 2024." SCAG, May 2020, *available at:* https://scag.ca.gov/program-environmental-impact-report-0.

- Establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
- Obtain CARB Portable Equipment Registration with the state or a local district permit for portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles. Arrange appropriate consultations with CARB or the local air district to determine registration and permitting requirements prior to equipment operation at the site.
- Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, parks and public spaces, minimize pedestrian barriers.
- Create urban non-motorized zones.
- Provide bike parking in non-residential and multi-unit residential projects
- Require residential area parking permit.
- Provide ride-sharing programs:
    - Designate a certain percentage of parking spacing for ride sharing vehicles,
    - Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles,
    - Providing a web site or messaging board for coordinating rides, and
    - Permanent transportation management association membership and finding requirement.

Provided above are several mitigation measures that would reduce Project-related VOC and $PM_{2.5}$/cancer risk emissions. These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduces emissions released during Project construction and operation.

A subsequent EIR should be prepared that includes all feasible mitigation measures, as well as an updated air quality analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The subsequent EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited documentation regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was

reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: CalEEMod Output Files
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Attachment A

San Francisco Housing Element Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	San Francisco Housing Element
Construction Start Date	1/1/2026
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	3.9
Precipitation (days)	42
Location	San Francisco, CA, USA
County	San Francisco
City	San Francisco
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1047
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.32

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	2,000	Dwelling Unit	53	1,920,000	—	—	4,660	—

Condo/Townhouse High Rise	2,000	Dwelling Unit	31	1,920,000	—	—	4,660	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	493	493	33	121	0.10	1.2	27	27	1.1	10	11	—	39,740	39,740	2.1	2.0	105	40,504
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	493	493	35	113	0.10	1.1	27	27	1.0	6.5	6.9	—	38,384	38,384	2.3	2.8	2.7	39,270
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	148	148	23	76	0.07	0.74	19	19	0.68	4.5	4.8	—	26,971	26,971	1.5	1.6	29	27,454
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	27	27	4.2	14	0.01	0.14	3.4	3.5	0.12	0.83	0.87	—	4,465	4,465	0.25	0.26	4.8	4,545

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.8	3.2	29	29	0.06	1.2	20	21	1.1	10	11	—	6,776	6,776	0.27	0.05	0.62	6,799
2027	11	8.6	33	121	0.10	0.42	27	27	0.39	6.5	6.9	—	39,740	39,740	2.1	2.0	105	40,504
2028	11	8.4	31	116	0.10	0.38	27	27	0.36	6.5	6.8	—	38,945	38,945	2.1	1.9	94	39,672
2029	11	8.1	29	111	0.10	0.35	27	27	0.33	6.5	6.8	—	38,138	38,138	1.9	1.9	84	38,850
2030	9.5	7.8	28	107	0.10	0.34	27	27	0.32	6.5	6.8	—	37,342	37,342	1.8	1.9	74	38,018
2031	9.2	7.6	26	104	0.10	0.32	27	27	0.30	6.5	6.8	—	36,693	36,693	1.7	1.8	65	37,333
2032	8.9	7.4	24	101	0.10	0.30	27	27	0.29	6.5	6.8	—	35,954	35,954	1.6	1.8	57	36,583
2033	493	493	5.9	16	0.01	0.18	4.8	4.8	0.17	1.1	1.1	—	4,730	4,730	0.06	0.04	7.6	4,750
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.7	3.1	27	28	0.06	1.1	9.4	10	1.0	3.7	4.7	—	6,766	6,766	0.27	0.06	0.02	6,791
2027	11	8.5	35	113	0.10	1.0	27	27	0.96	6.5	6.9	—	38,384	38,384	2.3	2.8	2.7	39,270
2028	11	8.2	33	108	0.10	0.38	27	27	0.36	6.5	6.8	—	37,614	37,614	2.1	2.7	2.4	38,471
2029	11	7.8	31	104	0.10	0.35	27	27	0.33	6.5	6.8	—	36,830	36,830	2.0	2.7	2.2	37,685
2030	9.5	7.7	29	100	0.10	0.34	27	27	0.32	6.5	6.8	—	36,055	36,055	2.0	1.9	1.9	36,663
2031	9.1	7.4	27	97	0.10	0.32	27	27	0.30	6.5	6.8	—	35,418	35,418	1.7	1.8	1.7	35,996
2032	8.8	7.3	26	93	0.10	0.30	27	27	0.29	6.5	6.8	—	34,697	34,697	1.6	1.8	1.5	35,273
2033	493	493	25	90	0.10	0.28	27	27	0.27	6.5	6.8	—	34,007	34,007	1.5	1.7	1.3	34,556
2034	493	493	1.5	14	< 0.005	0.01	4.8	4.8	0.01	1.1	1.1	—	4,430	4,430	0.07	0.04	0.17	4,443
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.4	2.0	18	18	0.03	0.74	5.8	6.6	0.68	2.7	3.4	—	3,709	3,709	0.15	0.03	0.17	3,723
2027	6.8	5.1	23	66	0.07	0.39	16	17	0.37	4.1	4.5	—	22,553	22,553	1.3	1.6	25	23,076
2028	7.8	5.8	23	76	0.07	0.27	19	19	0.25	4.5	4.8	—	26,971	26,971	1.5	1.4	29	27,454
2029	7.5	5.6	22	73	0.07	0.25	19	19	0.24	4.5	4.7	—	26,337	26,337	1.4	1.4	26	26,813
2030	6.7	5.5	20	69	0.07	0.24	19	19	0.23	4.5	4.7	—	25,782	25,782	1.4	1.3	23	26,237

2031	6.4	5.2	19	67	0.07	0.23	19	19	0.22	4.5	4.7	—	25,327	25,327	1.2	1.3	20	25,759
2032	6.2	5.2	19	65	0.07	0.22	19	19	0.20	4.5	4.7	—	24,879	24,879	1.1	1.3	17	25,307
2033	148	148	5.0	17	0.02	0.09	4.4	4.5	0.08	1.0	1.1	—	5,689	5,689	0.21	0.21	3.4	5,760
2034	2.9	2.9	0.01	0.08	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	26	26	< 0.005	< 0.005	0.02	26
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.43	0.37	3.3	3.3	0.01	0.14	1.1	1.2	0.12	0.49	0.61	—	614	614	0.02	0.01	0.03	616
2027	1.2	0.93	4.2	12	0.01	0.07	2.9	3.0	0.07	0.75	0.82	—	3,734	3,734	0.21	0.26	4.2	3,820
2028	1.4	1.1	4.2	14	0.01	0.05	3.4	3.5	0.05	0.83	0.87	—	4,465	4,465	0.25	0.23	4.8	4,545
2029	1.4	1.0	4.0	13	0.01	0.05	3.4	3.5	0.04	0.82	0.87	—	4,360	4,360	0.23	0.23	4.3	4,439
2030	1.2	1.00	3.7	13	0.01	0.04	3.4	3.5	0.04	0.82	0.86	—	4,269	4,269	0.22	0.22	3.8	4,344
2031	1.2	0.95	3.5	12	0.01	0.04	3.4	3.5	0.04	0.82	0.86	—	4,193	4,193	0.20	0.21	3.3	4,265
2032	1.1	0.94	3.4	12	0.01	0.04	3.4	3.5	0.04	0.83	0.86	—	4,119	4,119	0.19	0.21	2.9	4,190
2033	27	27	0.91	3.1	< 0.005	0.02	0.80	0.82	0.02	0.19	0.21	—	942	942	0.03	0.03	0.56	954
2034	0.53	0.53	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.3	4.3	< 0.005	< 0.005	< 0.005	4.3

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	167	161	70	547	1.1	4.3	82	86	4.2	21	25	1,819	147,054	148,873	189	3.7	35	154,742
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	146	141	71	313	1.0	4.2	82	86	4.2	21	25	1,819	143,053	144,872	189	4.0	28	150,827
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	149	145	31	386	0.75	1.1	76	77	1.1	19	20	1,819	90,932	92,751	188	3.7	31	98,577

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	27	27	5.7	70	0.14	0.20	14	14	0.20	3.5	3.7	301	15,055	15,356	31	0.61	5.1	16,321

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	44	41	19	298	0.75	0.27	82	82	0.25	21	21	—	76,997	76,997	3.1	2.9	7.6	77,951
Area	122	119	42	245	0.26	3.3	—	3.3	3.3	—	3.3	0.00	50,720	50,720	0.97	0.10	—	50,774
Energy	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	18,912	18,912	2.2	0.17	—	19,019
Water	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Total	167	161	70	547	1.1	4.3	82	86	4.2	21	25	1,819	147,054	148,873	189	3.7	35	154,742
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	44	41	23	293	0.72	0.27	82	82	0.25	21	21	—	73,602	73,602	3.4	3.2	0.20	74,645
Area	102	99	39	17	0.25	3.2	—	3.2	3.2	—	3.2	0.00	50,113	50,113	0.94	0.09	—	50,165
Energy	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	18,912	18,912	2.2	0.17	—	19,019
Water	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Total	146	141	71	313	1.0	4.2	82	86	4.2	21	25	1,819	143,053	144,872	189	4.0	28	150,827
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	41	38	21	269	0.69	0.26	76	76	0.24	19	20	—	70,060	70,060	3.1	3.0	3.1	71,022

Area	107	107	2.0	113	0.01	0.13	—	0.13	0.12	—	0.12	0.00	1,535	1,535	0.04	< 0.005	—	1,537
Energy	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	18,912	18,912	2.2	0.17	—	19,019
Water	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Total	149	145	31	386	0.75	1.1	76	77	1.1	19	20	1,819	90,932	92,751	188	3.7	31	98,577
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.5	7.0	3.7	49	0.13	0.05	14	14	0.04	3.5	3.6	—	11,599	11,599	0.51	0.49	0.52	11,759
Area	20	19	0.37	21	< 0.005	0.02	—	0.02	0.02	—	0.02	0.00	254	254	0.01	< 0.005	—	255
Energy	0.19	0.09	1.6	0.69	0.01	0.13	—	0.13	0.13	—	0.13	—	3,131	3,131	0.37	0.03	—	3,149
Water	—	—	—	—	—	—	—	—	—	—	—	37	70	108	3.8	0.09	—	231
Waste	—	—	—	—	—	—	—	—	—	—	—	264	0.00	264	26	0.00	—	923
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4.6	4.6
Total	27	27	5.7	70	0.14	0.20	14	14	0.20	3.5	3.7	301	15,055	15,356	31	0.61	5.1	16,321

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.7	2.3	21	19	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.7	2.3	21	19	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.75	0.63	5.7	5.2	0.01	0.23	—	0.23	0.21	—	0.21	—	939	939	0.04	0.01	—	942
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	1.0	0.95	< 0.005	0.04	—	0.04	0.04	—	0.04	—	155	155	0.01	< 0.005	—	156
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.04	0.04	0.03	0.52	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	133	133	< 0.005	< 0.005	0.46	134
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.47	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	126	126	< 0.005	< 0.005	0.01	127
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	34	34	< 0.005	< 0.005	0.05	35
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.7	5.7	< 0.005	< 0.005	0.01	5.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.7	3.1	29	29	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316

Dust From Material Movement	—	—	—	—	—	—	20	20	—	10	10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	4.8	4.7	0.01	0.20	—	0.20	0.19	—	0.19	—	871	871	0.04	0.01	—	874
Dust From Material Movement	—	—	—	—	—	—	3.2	3.2	—	1.7	1.7	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.87	0.86	< 0.005	0.04	—	0.04	0.03	—	0.03	—	144	144	0.01	< 0.005	—	145
Dust From Material Movement	—	—	—	—	—	—	0.59	0.59	—	0.30	0.30	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.03	0.61	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	155	155	< 0.005	< 0.005	0.54	156

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	24	24	< 0.005	< 0.005	0.04	24
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.0	4.0	< 0.005	< 0.005	0.01	4.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.6	3.0	27	28	0.06	1.1	—	1.1	1.0	—	1.0	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.2	9.2	—	3.7	3.7	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.6	3.0	27	28	0.06	1.1	—	1.1	1.0	—	1.0	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.2	9.2	—	3.7	3.7	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.99	0.83	7.4	7.5	0.02	0.31	—	0.31	0.28	—	0.28	—	1,795	1,795	0.07	0.01	—	1,801
Dust From Material Movement	—	—	—	—	—	—	2.5	2.5	—	0.99	0.99	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.4	1.4	< 0.005	0.06	—	0.06	0.05	—	0.05	—	297	297	0.01	< 0.005	—	298
Dust From Material Movement	—	—	—	—	—	—	0.46	0.46	—	0.18	0.18	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.04	0.69	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	177	177	< 0.005	< 0.005	0.62	178
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.04	0.63	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	168	168	< 0.005	0.01	0.02	170
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.17	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	46	46	< 0.005	< 0.005	0.07	46
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.6	7.6	< 0.005	< 0.005	0.01	7.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Grading (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.5	2.9	26	27	0.06	1.0	—	1.0	0.96	—	0.96	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.2	9.2	—	3.7	3.7	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.54	0.46	4.0	4.2	0.01	0.16	—	0.16	0.15	—	0.15	—	1,020	1,020	0.04	0.01	—	1,024
Dust From Material Movement	—	—	—	—	—	—	1.4	1.4	—	0.56	0.56	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.72	0.77	< 0.005	0.03	—	0.03	0.03	—	0.03	—	169	169	0.01	< 0.005	—	169
Dust From Material Movement	—	—	—	—	—	—	0.26	0.26	—	0.10	0.10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.04	0.60	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	165	165	< 0.005	0.01	0.01	167
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	25	25	< 0.005	< 0.005	0.04	26
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.2	4.2	< 0.005	< 0.005	0.01	4.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.69	0.58	5.3	7.2	0.01	0.19	—	0.19	0.17	—	0.17	—	1,342	1,342	0.05	0.01	—	1,346
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.96	1.3	< 0.005	0.03	—	0.03	0.03	—	0.03	—	222	222	0.01	< 0.005	—	223
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	8.0	7.2	5.2	94	0.00	0.00	24	24	0.00	5.6	5.6	—	25,057	25,057	0.38	0.19	80	25,204
Vendor	2.2	0.40	19	14	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	12,286	12,286	1.7	1.8	25	12,895
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	8.0	7.1	6.3	86	0.00	0.00	24	24	0.00	5.6	5.6	—	23,705	23,705	0.51	0.93	2.1	23,998

Vendor	2.2	0.39	20	14	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	12,282	12,282	1.7	1.8	0.65	12,866
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.4	3.8	3.0	47	0.00	0.00	13	13	0.00	3.0	3.0	—	13,291	13,291	0.25	0.52	19	13,472
Vendor	1.2	0.22	11	7.8	0.04	0.04	1.7	1.8	0.04	0.50	0.54	—	6,875	6,875	0.93	1.0	6.1	7,208
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.80	0.70	0.55	8.5	0.00	0.00	2.4	2.4	0.00	0.55	0.55	—	2,200	2,200	0.04	0.09	3.2	2,230
Vendor	0.22	0.04	2.0	1.4	0.01	0.01	0.32	0.33	0.01	0.09	0.10	—	1,138	1,138	0.15	0.17	1.0	1,193
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.99	8.9	13	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.99	8.9	13	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.4	9.3	0.02	0.22	—	0.22	0.20	—	0.20	—	1,717	1,717	0.07	0.01	—	1,723
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.2	1.7	< 0.005	0.04	—	0.04	0.04	—	0.04	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	7.9	7.0	4.4	90	0.00	0.00	24	24	0.00	5.6	5.6	—	24,628	24,628	0.38	0.19	72	24,767
Vendor	2.0	0.40	17	14	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,919	11,919	1.6	1.7	23	12,499
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	7.8	6.8	5.5	81	0.00	0.00	24	24	0.00	5.6	5.6	—	23,300	23,300	0.44	0.93	1.9	23,591
Vendor	2.0	0.38	18	14	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,916	11,916	1.6	1.7	0.58	12,475
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	5.5	4.8	3.8	57	0.00	0.00	17	17	0.00	3.9	3.9	—	16,718	16,718	0.32	0.14	22	16,789
Vendor	1.4	0.28	13	9.7	0.06	0.06	2.2	2.3	0.06	0.64	0.70	—	8,536	8,536	1.1	1.2	7.0	8,943

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.00	0.88	0.70	10	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,768	2,768	0.05	0.02	3.7	2,780
Vendor	0.26	0.05	2.3	1.8	0.01	0.01	0.41	0.42	0.01	0.12	0.13	—	1,413	1,413	0.19	0.21	1.2	1,481
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Building Construction (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.97	8.6	13	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.97	8.6	13	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.82	0.69	6.1	9.2	0.02	0.20	—	0.20	0.18	—	0.18	—	1,712	1,712	0.07	0.01	—	1,718

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.1	1.7	< 0.005	0.04	—	0.04	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	7.6	6.8	4.4	85	0.00	0.00	24	24	0.00	5.6	5.6	—	24,223	24,223	0.32	0.19	64	24,352
Vendor	1.9	0.32	16	13	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,518	11,518	1.5	1.7	20	12,093
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	7.6	6.6	5.4	78	0.00	0.00	24	24	0.00	5.6	5.6	—	22,917	22,917	0.44	0.93	1.7	23,208
Vendor	1.9	0.30	17	13	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,517	11,517	1.5	1.7	0.51	12,073
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	5.3	4.7	3.8	54	0.00	0.00	17	17	0.00	3.9	3.9	—	16,398	16,398	0.27	0.14	20	16,465
Vendor	1.4	0.21	12	9.4	0.06	0.06	2.2	2.3	0.06	0.64	0.70	—	8,227	8,227	1.1	1.2	6.1	8,630
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.97	0.86	0.69	9.9	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,715	2,715	0.05	0.02	3.3	2,726
Vendor	0.25	0.04	2.1	1.7	0.01	0.01	0.40	0.41	0.01	0.12	0.13	—	1,362	1,362	0.18	0.21	1.0	1,429
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Building Construction (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.94	8.4	13	0.02	0.26	—	0.26	0.24	—	0.24	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.94	8.4	13	0.02	0.26	—	0.26	0.24	—	0.24	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.80	0.67	6.0	9.2	0.02	0.19	—	0.19	0.17	—	0.17	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	1.1	1.7	< 0.005	0.03	—	0.03	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.6	6.5	4.3	82	0.00	0.00	24	24	0.00	5.6	5.6	—	23,839	23,839	0.32	0.19	57	23,961
Vendor	1.7	0.31	15	13	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,106	11,106	1.4	1.7	17	11,653
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.6	6.5	5.4	74	0.00	0.00	24	24	0.00	5.6	5.6	—	22,553	22,553	0.44	0.19	1.5	22,622
Vendor	1.7	0.30	16	13	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,105	11,105	1.4	1.7	0.45	11,636
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.7	4.6	3.2	51	0.00	0.00	17	17	0.00	3.9	3.9	—	16,138	16,138	0.27	0.14	18	16,203
Vendor	1.2	0.21	11	9.1	0.06	0.06	2.2	2.3	0.06	0.64	0.70	—	7,932	7,932	1.0	1.2	5.4	8,316
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.85	0.83	0.59	9.3	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,672	2,672	0.05	0.02	2.9	2,683
Vendor	0.23	0.04	2.0	1.7	0.01	0.01	0.40	0.41	0.01	0.12	0.13	—	1,313	1,313	0.17	0.20	0.89	1,377
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Building Construction (2031) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.92	8.1	13	0.02	0.24	—	0.24	0.22	—	0.22	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.92	8.1	13	0.02	0.24	—	0.24	0.22	—	0.22	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.78	0.66	5.8	9.2	0.02	0.17	—	0.17	0.16	—	0.16	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.1	1.7	< 0.005	0.03	—	0.03	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	6.5	6.3	3.5	79	0.00	0.00	24	24	0.00	5.6	5.6	—	23,605	23,605	0.32	0.19	50	23,720
Vendor	1.6	0.31	14	12	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	10,691	10,691	1.2	1.6	15	11,208
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.3	6.2	4.6	72	0.00	0.00	24	24	0.00	5.6	5.6	—	22,330	22,330	0.38	0.19	1.3	22,397
Vendor	1.6	0.30	15	12	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	10,692	10,692	1.2	1.6	0.39	11,194
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.5	4.3	3.2	49	0.00	0.00	17	17	0.00	3.9	3.9	—	15,978	15,978	0.27	0.14	15	16,041
Vendor	1.2	0.21	10	8.8	0.06	0.06	2.2	2.3	0.06	0.64	0.70	—	7,637	7,637	0.89	1.1	4.6	8,000
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.82	0.79	0.58	9.0	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,645	2,645	0.05	0.02	2.6	2,656
Vendor	0.21	0.04	1.9	1.6	0.01	0.01	0.40	0.41	0.01	0.12	0.13	—	1,264	1,264	0.15	0.19	0.76	1,324
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.19. Building Construction (2032) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.90	7.9	13	0.02	0.22	—	0.22	0.21	—	0.21	—	2,397	2,397	0.10	0.02	—	2,405

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.90	7.9	13	0.02	0.22	—	0.22	0.21	—	0.21	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.77	0.64	5.6	9.2	0.02	0.16	—	0.16	0.15	—	0.15	—	1,717	1,717	0.07	0.01	—	1,723
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.0	1.7	< 0.005	0.03	—	0.03	0.03	—	0.03	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.3	6.2	3.5	76	0.00	0.00	24	24	0.00	5.6	5.6	—	23,278	23,278	0.32	0.19	44	23,387
Vendor	1.5	0.31	13	12	0.08	0.08	3.1	3.2	0.08	0.91	0.99	—	10,279	10,279	1.2	1.6	13	10,791
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	6.3	6.1	4.5	68	0.00	0.00	24	24	0.00	5.6	5.6	—	22,020	22,020	0.38	0.19	1.1	22,087
Vendor	1.5	0.30	14	12	0.08	0.08	3.1	3.2	0.08	0.91	0.99	—	10,280	10,280	1.2	1.6	0.33	10,780
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.4	4.3	3.2	47	0.00	0.00	17	17	0.00	3.9	3.9	—	15,800	15,800	0.23	0.14	14	15,860
Vendor	1.1	0.21	9.7	8.5	0.06	0.06	2.2	2.2	0.06	0.64	0.70	—	7,363	7,363	0.83	1.1	3.9	7,725
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.80	0.79	0.58	8.7	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,616	2,616	0.04	0.02	2.2	2,626
Vendor	0.19	0.04	1.8	1.6	0.01	0.01	0.40	0.41	0.01	0.12	0.13	—	1,219	1,219	0.14	0.19	0.65	1,279
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.21. Building Construction (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.0	0.88	7.7	13	0.02	0.20	—	0.20	0.19	—	0.19	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.12	0.10	0.87	1.5	< 0.005	0.02	—	0.02	0.02	—	0.02	—	272	272	0.01	< 0.005	—	273
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.16	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	45	45	< 0.005	< 0.005	—	45
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.1	5.9	4.4	66	0.00	0.00	24	24	0.00	5.6	5.6	—	21,738	21,738	0.38	0.19	0.99	21,805
Vendor	1.4	0.30	13	12	0.08	0.08	3.1	3.2	0.08	0.91	0.99	—	9,872	9,872	1.1	1.5	0.28	10,347
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.68	0.67	0.41	7.3	0.00	0.00	2.6	2.6	0.00	0.62	0.62	—	2,472	2,472	0.04	0.02	1.9	2,481
Vendor	0.16	0.03	1.4	1.3	0.01	0.01	0.34	0.35	0.01	0.10	0.11	—	1,120	1,120	0.12	0.17	0.52	1,175
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.12	0.08	1.3	0.00	0.00	0.48	0.48	0.00	0.11	0.11	—	409	409	0.01	< 0.005	0.31	411
Vendor	0.03	0.01	0.26	0.24	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	185	185	0.02	0.03	0.09	194
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.23. Paving (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.70	0.59	5.9	9.8	0.01	0.18	—	0.18	0.17	—	0.17	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.70	0.59	5.9	9.8	0.01	0.18	—	0.18	0.17	—	0.17	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.18	1.8	3.0	< 0.005	0.06	—	0.06	0.05	—	0.05	—	455	455	0.02	< 0.005	—	457
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.04	0.03	0.33	0.54	< 0.005	0.01	—	0.01	0.01	—	0.01	—	75	75	< 0.005	< 0.005	—	76
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.38	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	120	120	< 0.005	< 0.005	0.20	120
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.34	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	113	113	< 0.005	< 0.005	0.01	114
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	34	34	< 0.005	< 0.005	0.03	34
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.7	5.7	< 0.005	< 0.005	< 0.005	5.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.25. Architectural Coating (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.76	1.1	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	492	492	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.76	1.1	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	492	492	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.23	0.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	40	40	< 0.005	< 0.005	—	40

Architectural Coating	146	146	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.6	6.6	< 0.005	< 0.005	—	6.6
Architectural Coatings	27	27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.2	1.2	0.69	15	0.00	0.00	4.8	4.8	0.00	1.1	1.1	—	4,596	4,596	0.05	0.04	7.6	4,616
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.2	1.2	0.89	13	0.00	0.00	4.8	4.8	0.00	1.1	1.1	—	4,348	4,348	0.08	0.04	0.20	4,361
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.36	0.35	0.22	3.8	0.00	0.00	1.4	1.4	0.00	0.32	0.32	—	1,296	1,296	0.02	0.01	0.98	1,300
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.69	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	214	214	< 0.005	< 0.005	0.16	215
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.27. Architectural Coating (2034) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.76	1.1	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	492	492	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.78	0.78	< 0.005	< 0.005	—	0.79
Architectural Coatings	2.9	2.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.13	0.13	< 0.005	< 0.005	—	0.13
Architectural Coatings	0.53	0.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.2	1.1	0.74	13	0.00	0.00	4.8	4.8	0.00	1.1	1.1	—	4,296	4,296	0.06	0.04	0.17	4,309
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.07	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	25	25	< 0.005	< 0.005	0.02	25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.2	4.2	< 0.005	< 0.005	< 0.005	4.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	22	20	9.7	149	0.38	0.13	41	41	0.13	10	11	—	38,498	38,498	1.5	1.5	3.8	38,975
Condo/Townhouse High Rise	22	20	9.7	149	0.38	0.13	41	41	0.13	10	11	—	38,498	38,498	1.5	1.5	3.8	38,975
Total	44	41	19	298	0.75	0.27	82	82	0.25	21	21	—	76,997	76,997	3.1	2.9	7.6	77,951
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	22	20	11	146	0.36	0.13	41	41	0.13	10	11	—	36,801	36,801	1.7	1.6	0.10	37,323
Condo/Townhouse High Rise	22	20	11	146	0.36	0.13	41	41	0.13	10	11	—	36,801	36,801	1.7	1.6	0.10	37,323
Total	44	41	23	293	0.72	0.27	82	82	0.25	21	21	—	73,602	73,602	3.4	3.2	0.20	74,645
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	3.7	3.5	1.9	25	0.06	0.02	6.9	7.0	0.02	1.8	1.8	—	5,800	5,800	0.26	0.25	0.26	5,879
Condo/Townhouse High Rise	3.7	3.5	1.9	25	0.06	0.02	6.9	7.0	0.02	1.8	1.8	—	5,800	5,800	0.26	0.25	0.26	5,879
Total	7.5	7.0	3.7	49	0.13	0.05	14	14	0.04	3.5	3.6	—	11,599	11,599	0.51	0.49	0.52	11,759

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	3,813	3,813	0.62	0.07	—	3,851
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	3,813	3,813	0.62	0.07	—	3,851
Total	—	—	—	—	—	—	—	—	—	—	—	—	7,626	7,626	1.2	0.15	—	7,701
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	3,813	3,813	0.62	0.07	—	3,851

Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	3,813	3,813	0.62	0.07	—	3,851
Total	—	—	—	—	—	—	—	—	—	—	—	—	7,626	7,626	1.2	0.15	—	7,701
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	631	631	0.10	0.01	—	638
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	631	631	0.10	0.01	—	638
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,263	1,263	0.20	0.02	—	1,275

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.52	0.26	4.4	1.9	0.03	0.36	—	0.36	0.36	—	0.36	—	5,643	5,643	0.50	0.01	—	5,659
Condo/Townhouse High Rise	0.52	0.26	4.4	1.9	0.03	0.36	—	0.36	0.36	—	0.36	—	5,643	5,643	0.50	0.01	—	5,659
Total	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	11,286	11,286	1.00	0.02	—	11,318
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	0.52	0.26	4.4	1.9	0.03	0.36	—	0.36	0.36	—	0.36	—	5,643	5,643	0.50	0.01	—	5,659
Condo/Townhouse High Rise	0.52	0.26	4.4	1.9	0.03	0.36	—	0.36	0.36	—	0.36	—	5,643	5,643	0.50	0.01	—	5,659
Total	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	11,286	11,286	1.00	0.02	—	11,318
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.09	0.05	0.81	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	934	934	0.08	< 0.005	—	937
Condo/Townhouse High Rise	0.09	0.05	0.81	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	934	934	0.08	< 0.005	—	937
Total	0.19	0.09	1.6	0.69	0.01	0.13	—	0.13	0.13	—	0.13	—	1,869	1,869	0.17	< 0.005	—	1,874

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.6	2.3	39	17	0.25	3.2	—	3.2	3.2	—	3.2	0.00	50,113	50,113	0.94	0.09	—	50,165
Consumer Products	82	82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coating	15	15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	21	20	2.1	228	0.01	0.10	—	0.10	0.08	—	0.08	—	607	607	0.03	0.01	—	609
Total	122	119	42	245	0.26	3.3	—	3.3	3.3	—	3.3	0.00	50,720	50,720	0.97	0.10	—	50,774
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.6	2.3	39	17	0.25	3.2	—	3.2	3.2	—	3.2	0.00	50,113	50,113	0.94	0.09	—	50,165
Consumer Products	82	82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	15	15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	102	99	39	17	0.25	3.2	—	3.2	3.2	—	3.2	0.00	50,113	50,113	0.94	0.09	—	50,165
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.02	0.01	0.18	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	205	205	< 0.005	< 0.005	—	205
Consumer Products	15	15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	2.7	2.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.9	1.8	0.19	21	< 0.005	0.01	—	0.01	0.01	—	0.01	—	50	50	< 0.005	< 0.005	—	50
Total	20	19	0.37	21	< 0.005	0.02	—	0.02	0.02	—	0.02	0.00	254	254	0.01	< 0.005	—	255

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	112	212	325	12	0.28	—	697
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	112	212	325	12	0.28	—	697
Total	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	112	212	325	12	0.28	—	697
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	112	212	325	12	0.28	—	697
Total	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	19	35	54	1.9	0.05	—	115

Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	19	35	54	1.9	0.05	—	115
Total	—	—	—	—	—	—	—	—	—	—	—	37	70	108	3.8	0.09	—	231

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	797	0.00	797	80	0.00	—	2,789
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	797	0.00	797	80	0.00	—	2,789
Total	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	797	0.00	797	80	0.00	—	2,789
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	797	0.00	797	80	0.00	—	2,789
Total	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	132	0.00	132	13	0.00	—	462
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	132	0.00	132	13	0.00	—	462
Total	—	—	—	—	—	—	—	—	—	—	—	264	0.00	264	26	0.00	—	923

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	14	14
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	14	14
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	14	14

Condo/T High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	14	14
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.3	2.3
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.3	2.3
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4.6	4.6

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	5/21/2026	5.0	100	—
Site Preparation	Site Preparation	5/22/2026	8/14/2026	5.0	60	—
Grading	Grading	8/15/2026	3/20/2027	5.0	155	—
Building Construction	Building Construction	3/21/2027	2/27/2033	5.0	1,550	—
Paving	Paving	2/28/2033	8/1/2033	5.0	110	—
Architectural Coating	Architectural Coating	8/2/2033	1/3/2034	5.0	110	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Average	2.0	8.0	367	0.40
Demolition	Excavators	Diesel	Average	3.0	8.0	36	0.38
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.0	33	0.73

Site Preparation	Rubber Tired Dozers	Diesel	Average	3.0	8.0	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.0	8.0	84	0.37
Grading	Graders	Diesel	Average	1.00	8.0	148	0.41
Grading	Excavators	Diesel	Average	2.0	8.0	36	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.0	8.0	84	0.37
Grading	Scrapers	Diesel	Average	2.0	8.0	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.0	367	0.40
Building Construction	Forklifts	Diesel	Average	3.0	8.0	82	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.0	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.0	46	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.0	7.0	84	0.37
Paving	Pavers	Diesel	Average	2.0	8.0	81	0.42
Paving	Paving Equipment	Diesel	Average	2.0	8.0	89	0.36
Paving	Rollers	Diesel	Average	2.0	8.0	36	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.0	37	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	15	12	LDA,LDT1,LDT2
Demolition	Vendor	—	8.4	HHDT,MHDT
Demolition	Hauling	0.00	20	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	18	12	LDA,LDT1,LDT2

Site Preparation	Vendor	—	8.4	HHDT,MHDT
Site Preparation	Hauling	0.00	20	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	20	12	LDA,LDT1,LDT2
Grading	Vendor	—	8.4	HHDT,MHDT
Grading	Hauling	0.00	20	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	2,880	12	LDA,LDT1,LDT2
Building Construction	Vendor	428	8.4	HHDT,MHDT
Building Construction	Hauling	0.00	20	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15	12	LDA,LDT1,LDT2
Paving	Vendor	—	8.4	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	576	12	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.4	HHDT,MHDT
Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	7,776,000	2,592,000	0.00	0.00	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	0.00
Site Preparation	—	—	90	0.00	0.00
Grading	—	—	465	0.00	0.00
Paving	0.00	0.00	0.00	0.00	0.00

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Apartments Mid Rise	—	0%
Paving	Condo/Townhouse High Rise	—	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005
2029	0.00	204	0.03	< 0.005
2030	0.00	204	0.03	< 0.005
2031	0.00	204	0.03	< 0.005
2032	0.00	204	0.03	< 0.005
2033	0.00	204	0.03	< 0.005

2034	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	10,880	9,820	8,180	3,775,143	57,891	52,251	43,525	20,087,074
Condo/Townhouse High Rise	10,880	9,820	8,180	3,775,143	57,891	52,251	43,525	20,087,074

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Apartments Mid Rise	Wood Fireplaces	0	0
Apartments Mid Rise	Gas Fireplaces	1,020	1,020
Apartments Mid Rise	Propane Fireplaces	0	0
Apartments Mid Rise	Electric Fireplaces	0	0
Apartments Mid Rise	No Fireplaces	980	980
Apartments Mid Rise	Conventional Wood Stoves	0	0
Apartments Mid Rise	Catalytic Wood Stoves	0	0
Apartments Mid Rise	Non-Catalytic Wood Stoves	0	0
Apartments Mid Rise	Pellet Wood Stoves	0	0
Condo/Townhouse High Rise	Wood Fireplaces	0	0
Condo/Townhouse High Rise	Gas Fireplaces	1,020	1,020
Condo/Townhouse High Rise	Propane Fireplaces	0	0
Condo/Townhouse High Rise	Electric Fireplaces	0	0
Condo/Townhouse High Rise	No Fireplaces	980	980

Condo/Townhouse High Rise	Conventional Wood Stoves	0	0
Condo/Townhouse High Rise	Catalytic Wood Stoves	0	0
Condo/Townhouse High Rise	Non-Catalytic Wood Stoves	0	0
Condo/Townhouse High Rise	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

—	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	7,776,000	2,592,000	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	6,822,902	204	0.0330	0.0040	17,608,142
Condo/Townhouse High Rise	6,822,902	204	0.0330	0.0040	17,608,142

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	58,681,050	0.00

Condo/Townhouse High Rise	58,681,050	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	1,479	0.00
Condo/Townhouse High Rise	1,479	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.5	2.5	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Condo/Townhouse High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.5	2.5	10.0
Condo/Townhouse High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.9	annual days of extreme heat

Extreme Precipitation	7.5	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	4.4	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score

Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	3.1
AQ-PM	25
AQ-DPM	99
Drinking Water	15
Lead Risk Housing	59
Pesticides	9.0
Toxic Releases	45
Traffic	53

Effect Indicators	—
CleanUp Sites	74
Groundwater	71
Haz Waste Facilities/Generators	98
Impaired Water Bodies	0.00
Solid Waste	80
Sensitive Population	—
Asthma	81
Cardio-vascular	18
Low Birth Weights	84
Socioeconomic Factor Indicators	—
Education	48
Housing	67
Linguistic	82
Poverty	65
Unemployment	54

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	21.28833569
Employed	26.07468241
Median HI	16.37366868
Education	—
Bachelor's or higher	64.48094444
High school enrollment	100
Preschool enrollment	38.90671115

Transportation	—
Auto Access	0.372128834
Active commuting	99.53804697
Social	—
2-parent households	2.643397921
Voting	31.75927114
Neighborhood	—
Alcohol availability	4.516874118
Park access	38.62440652
Retail density	99.05042987
Supermarket access	94.25125112
Tree canopy	6.03105351
Housing	—
Homeownership	10.15013474
Housing habitability	0.526113178
Low-inc homeowner severe housing cost burden	32.54202489
Low-inc renter severe housing cost burden	44.3731554
Uncrowded housing	36.46862569
Health Outcomes	—
Insured adults	41.04965995
Arthritis	59.3
Asthma ER Admissions	18.9
High Blood Pressure	44.4
Cancer (excluding skin)	68.9
Asthma	37.3
Coronary Heart Disease	43.7
Chronic Obstructive Pulmonary Disease	33.2
Diagnosed Diabetes	36.9

Life Expectancy at Birth	23.5
Cognitively Disabled	4.4
Physically Disabled	1.7
Heart Attack ER Admissions	60.2
Mental Health Not Good	34.8
Chronic Kidney Disease	35.4
Obesity	39.8
Pedestrian Injuries	98.0
Physical Health Not Good	33.1
Stroke	34.3
Health Risk Behaviors	—
Binge Drinking	24.0
Current Smoker	20.2
No Leisure Time for Physical Activity	36.8
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	86.0
Elderly	54.5
English Speaking	11.2
Foreign-born	81.4
Outdoor Workers	88.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	0.2
Traffic Density	58.5
Traffic Access	87.4
Other Indices	—
Hardship	58.6

Other Decision Support	—
2016 Voting	44.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	71
Healthy Places Index Score for Project Location (b)	20
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Operations: Water and Waste Water	Outdoor water use set to zero.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Matthew F. Hagemann, P.G., C.Hg.

- **Geologic and Hydrogeologic Characterization, Investigation and Remediation Strategies**
- **Industrial Stormwater Compliance**
- **CEQA Review**
- **Expert Testimony**

Professional Certifications:
California Professional Geologist, P.G.
California Certified Hydrogeologist, C.Hg.

Education:
M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Experience:
30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. Spent nine years with the U.S. EPA in the Resource Conservation Recovery Act (RCRA) and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where I identified emerging threats to groundwater. While with EPA, I served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. Led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, I developed extensive client relationships and has managed complex projects that include consultations as an expert witness and a regulatory specialist, and managing projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions held include:

Government:
Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);

Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
Geologist, U.S. Forest Service (1986 – 1998).

Educational:
Geology Instructor, Golden West College, 2010 – 2104, 2017;
Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
Instructor, College of Marin, Department of Science (1990 – 1995).

Private Sector:
Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);
Executive Director, Orange Coast Watch (2001 – 2004);
Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, responsibilities have included:

- Lead analyst and testifying expert, for both plaintiffs and defendants, in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards.
- Recommending additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce exposure to hazards from toxins.
- Stormwater analysis, sampling and best management practice evaluation, for both government agencies and corporate clients, at more than 150 industrial facilities.
- Serving as expert witness for both plaintiffs and defendants in cases including contamination of groundwater, CERCLAcompliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns, for both government agencies and corporate clients.
- Lead analyst and testifying expert in the review of environmental issues in license applicationsfor large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking

water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.
- Lead author for a multi-volume remedial investigation report for an operating school in LosAngeles that met strict Sate of California regulatory requirements.
- Development of strategic approaches for cleanup of contaminated sites in consultation withclients and regulators.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities included:

- Leading efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiating a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identifying emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. Used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. Prepared geologic reports, conducted hearings, and responded to public comments from residents who were very concerned about the impact of designation.
- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Served as a hydrogeologist with the RCRA Hazardous Waste program. Duties included:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliancewith Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S.EPA legal counsel.

- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexicoand advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation- wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served as senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advising the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinkingwater supplies.
- Shaping EPA's national response to these threats by serving on workgroups and by contributingto guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improving the technical training of EPA's scientific and engineering staff.
- Earning an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Establishing national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities included:

- Mapping geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinating research with community stakeholders who were concerned with natural resource protection.
- Characterizing the geology of an aquifer that serves as the sole source of drinking water for thecity of Medford, Oregon.

As a consultant with Dames and Moore, led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large RCRA hazardous waste site in eastern Oregon.

Duties included the following:

- Supervising year-long effort for soil and groundwater sampling.
- Conducting aquifer tests.
- Investigating active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.
- Part time geology instructor at Golden West College in Huntington Beach, California from 2010 to 2014 and in 2017.

Summary of Testimony Experience Over Past Four Years

In Re New Jersey Department of Environmental Protection et al. vs. E.I. DuPont de Nemours and Company, in the United States District Court, District of New Jersey, Civil Action No. 1:19-cv-14766-RMB-JBC. Deposition in 2025. Representing Plaintiffs in matters regarding contamination of groundwater, wastewater, soil, and air with per- and poly-fluoroalkyl substances.

In Re Edmond Asher, et al., vs. RTX Corporation (f/k/a Raytheon Technologies Corporation, et al.) in the County of Huntington Superior Court, Indiana, Cause number 35D01-2006-CT-000338. Deposition in 2024. Representing Plaintiffs in matters regarding contamination of groundwater and soil vapor with trichlorethylene.

In Re Wright vs Consolidated Rail Corporation In the Circuit Court of Cook County, Illinois, Case No: 21L3966. Deposition in 2023, Representing Plaintiff in matters involving groundwater and drinking water contamination of perchloroethylene, trichlorethylene, 1,2-dichloroethane, and carbon tetrachloride.

In Re Behr Dayton Thermal Products LLC In the United States District Court for the Southern District of Ohio Western Division at Dayton, Case No: 08-cv-326. Deposition in 2022. Representing Plaintiff in matters regarding contamination of groundwater and indoor air with perchloroethylene and trichloethelene.

Orange County Water District vs. Sabic Innovative Plastics US, LLC, et al. In the Court of Appeal, Fourth District,

Division 1, California, Case No: D070553. Deposition in 2020. Representing Plaintiff in matters involving compliance with The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
Los Angeles Waterkeeper vs. AAA Plating and Inspection, Inc. In the United States District Court for the Central District of California, Case No: No. CV 18-5916 PA (GJSx). Deposition in 2019. Expert witness representing Plaintiff in matters involving contaminated stormwater runoff at an industrial facility in Compton, California.

Californians for Alternatives to Toxics vs. Schneider Dock and Intermodal Facility. In the United States District Court for the Northern District of California, Case No: 3:17-cv-05287-JST. Deposition in 2019. Expert witness representing Plaintiff in matters involving contaminated stormwater runoff at an industrial facility in Eureka, California.

Bells et al. vs. The 3M Company et al. In the United States District Court for the District of Colorado, Case No: 1:16-CV-02531-RBJ. Deposition in 2018. Expert witness representing Plaintiff on matters regarding the general hydrogeological conditions present in an area impacted by per- and poly-fluoroalkyl substances.

Ungar vs. Foundation for Affordable Housing. In the Superior Court, State of California, Los Angeles County, Case No. BC628890 Deposition in 2017. Expert witness representing defendant on matters involving alleged drinking water contamination.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S.EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making andPublic Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins atschools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBEReleases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells.

Presentation to the Ground Water and Environmental Law Conference, National GroundwaterAssociation.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Waterin Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Waterin the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to atribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to ameeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking WaterSupplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant.Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting ofthe National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to ameeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to AddressImpacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater(and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA andState Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublishedreport.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground StorageTanks.

Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal WatercraftUsage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George WrightSociety Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval AirStation, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui,October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Airand Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Basesin California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:
Selected as subject matter expert for the California Professional Geologist licensing examinations,2009-2011.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld, P.E., Spaeth, K.R., McCarthy, S.J. *et al.* Camp Lejeune Marine Cancer Risk Assessment for Exposure to Contaminated Drinking Water From 1955 to 1987. *Water Air Soil Pollut* **235**, 124 (2024). https://doi.org/10.1007/s11270-023-06863-y.

Rosenfeld P.E., Spaeth K.R., Remy L.L., Byers V., Muerth S.A., Hallman R,C., Summers-Evans J., Barker S. (2023) Perfluoroalkyl substances exposure in firefighters: Sources and implications, *Environmental Research*, Volume 220, https://doi.org/10.1016/j.envres.2022.115164.

Rosenfeld P.E. and Spaeth K.R., (2023) Authors' Response to Letter to the Editor from Bullock and Ramacciotti, *Water Air Soil Pollution* Volume 234, https://doi.org/10.1007/s11270-023-06165-3

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.,** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Cheremisinoff, N.P., **Rosenfeld, P.E.** Davletshin, A.R. (2008). ***Responsible Care***. Gulf Publishing. Texas.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy of Odour Wheels for Odours of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme for The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated with Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affects on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook for Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation on St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Master's thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelor's Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted at University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus on Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model for PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium on Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium on Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting for Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington.

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation with High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation with High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. The course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate the effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate the effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate the effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the District Court of Harris County Texas
Mt Davis Interest, Inc v Sesco Cement Corp
Cause No 2023-26512
Trial 6-6-2-25

In the United States Southern District of New York
Gallo vs Avon Products Inc., et al
Civil Action No.: 1:23-cv-2023
Deposition 4-24-2025

In Vanderburgh Superior Court 5, County of Vanderburgh, Indiana
Markello v CSX
Civil Action No 82D05-2011-CT-004962
Deposition 3-26-25

Iin the Circuit Court of Cook County Illinois
Jarosiewicz v Northeast Regional Railroad
Case No 2023 L 002290
Deposition 2-27-25

In the District Court 191st Judicial District Dallas County
Acklin v Poly America International
Cause No DC-22-08610
Deposition 1-8-2025

United States District Court, Norther District of California
Asustin Vs Monsanto
Case No 2:23-cv-272
Deposition 12-20-25

In Jefferson Circuit Court Division One, Louisville, Kentucky
Stafford vs, CSX
Case No. 18-CI-001790

Deposition: 8-27-24

In the Twenty-Second Judicial Circuit of St. Louis. State of Missouri
Patricia Godfrey vs, Amtrak
Case No. 2122-CC-00525
Deposition: 7-17-24

In the Circuit Court of Jefferson County Alabama
Linda Early Vs. CSX
Case number CV-2021-00241
Deposition 6-24-24

In the Court of Common Please Lucas County, Ohio
Brenda Conkright vs. CSX
Case No. G-4801-CI-0202102664-000
Deposition: 6-4-24

In the Commonwealth of Kentucky, Greenup Circuit Court
Patsy Sue Napier vs. CSX
Case No. 19-CI-0012
Deposition: 5-8-2-24

In United States District Court of Hawaii
Patrick Feindt, Jr. et al. vs. The United States of America
Case No. 1:22-cv-LEK-KJM
Trial 3-29-24 and 4-5-24

In the District Court of Hood County State of Texas
Artie Gray vs. Exxon Mobil
Case No. C-2018047
Rosenfeld Deposition:4-22-2024

In the Elkhart Superior Court State of Indiana
Estate of Clark Stacy vs. Penn Central Corporation
Cause No 2D01-2001-CT-00007
Rosenfeld Deposition 1-25-2024 and 3-7-2024

In the Circuit Court of Trempealeau County, State of Wisconsin
Michael J. Sylla et al. vs. High-Crush Whitehall LLC
Case No. 2019-CV-63, 2019-CV-64, 2019-CV-65, 2019-CV-66
Rosenfeld Deposition: 3-5-2024

In the Circuit Court of Trempealeau County, State of Wisconsin
Leland Drangstveit vs. High-Crush Blair LLC
Case No. 19-CV-66
Rosenfeld Deposition 3-5-2024

In the Circuit Court of Jefferson County Alabama
Donald Lee Ashworth vs. CSX Transportation Inc.
Case No CV-2021-901261
Rosenfeld Deposition 1-23-2024

In the United States District Court for the Eastern District of Wisconsin
Gary L Siepe vs. Soo Line Railroad
Case No. 2:21-cv-00919
Rosenfeld Deposition 1-19-2024

In the United States District Court for the Western District of Louisiana
Ricky Bush v. Clean Harbors Colfax LLC
Case No. 1:22-cv-02026-DDD-JPM
Rosenfeld Deposition 12-18-2023 and 1-15-2024

In United States District Court of Hawaii
Patrick Feindt, Jr. et al. vs. The United States of America
Case No. 1:22-cv-LEK-KJM
Rosenfeld Deposition 11-29-2023

In the Circuit Court for the Twentieth Judicial Circuit St. Clair County, Illinois
Timothy Gray vs. Rural King et al.
Case No 2022-LA-355
Rosenfeld Deposition 9-26-2023

In United States District Court Eastern District of Wisconsin
Gary L. Siepe vs. Soo Line Railroad Company
Case No. 2:21-cv-00919
Rosenfeld Deposition 9-15-2023

In the Circuit Court of Cook County Illinois
Donald Fox vs. BNSF
Case No. 2021 L12
Rosenfeld Deposition 9-12-2023

In the Court of Common Please Cuyahoga County, Ohio
Thomas Schleich vs. Penn Central Corporation
Lead Case No. CV-20-939184
Rosenfeld Deposition 8-27-2023

In the Circuit Court of Jackson County Missouri at Kansas City
Timothy Dalsing vs. BNSF
Case No. No. 2216-cv06539
Rosenfeld Deposition 7-28-2023

In the United States District Court for the Southern District of Texas Houston Division
International Terminals Company LLC Deer Park Fire Litigation
Lead Case No. 4:19-cv-01460
Rosenfeld Deposition 7-25-2023

In the Circuit Court of Livingston County Missouri
Shirley Ralls vs. Canadian Pacific Railway and Soo Lind Railroad
Case No. 28LV-CV0020
Rosenfeld Daubert Hearing 7-18-2023 Trial Testimony 7-19-2023

In the Circuit Court of Cook County Illinois
Brenda Wright vs. Penn Central and Conrail
Case No. No. 2032L003966
Rosenfeld Deposition 6-13-2023

In the Circuit Court Common Please Philadelphia of Jefferson County Alabama
Frank Belle vs. Birmingham Southern Railroad Company et al.
Case No. 01-cv-2021-900901.00
Rosenfeld Deposition 4-6-2023

In the Circuit Court of Jefferson County Alabama
Linda De Gregorio vs. Penn Central
Case No. 002278
Rosenfeld Deposition 3-27-20203

In the United States District Court Eastern District of New York
Rosalie Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-16-2023

In the Superior Court of Washington, Spokane County
Judy Cundy vs. BNSF
Case No. 21-2-03718-32
Rosenfeld Deposition 3-9-2023

In The Court of Common Pleas of Philadelphia County, PA Civil Trial Division
Feaster v Conrail
Case No. 001075
Rosenfeld Deposition 2-1-2023

In United States District Court for the Central District of Illinois
Sherman vs. BNSF
Case No. 3:17-cv-01192
Rosenfeld Deposition 1-18-2023

In United States District Court District of Colorado
Gonzales vs. BNSF
Case No. 1:21-cv-01690
Rosenfeld Deposition 1-17-2023

In United States District Court District of Colorado
Abeyta vs. BNSF
Case No. 1:21-cv-01689-KMT
Rosenfeld Deposition 1-3-2023

In United States District Court For The Easter District of Louisiana
Nathaniel Smith vs. Illinois Central Railroad
Case No. 2:21-cv-01235
Rosenfeld Deposition 11-30-2022

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division

Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022, Trial 1-10-2023

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation

Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al. vs Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois

Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants

Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintifs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. vs. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.

Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, vs. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the County of Kern, Unlimited Jurisdiction
Rose Propagation Services vs. Heppe Enterprises
Case No. S-1500-CV-278190, LHB
Rosenfeld Deposition: May 2014

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

In the Court of Galveston County, Texas 56th Judicial District
MDL Litigation Regarding Texas City Refinery Ultracracker Emission Event Litigation
Cause No. 10-UC-0001
Rosenfeld Deposition: March 2013
Rosenfeld Trial: September 2013

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the United States District court of Southern District of California
United States of America, Plaintiff vs. 2,560 Acres of Land, more or less, located in Imperial County, State of California; and Donald L. Crawford, et. al.
Civil No. 3:11-cv-02258-IEG-RBB
Rosenfeld Deposition: December 2012, January 2013

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.

From:	David Harrison
To:	Board of Supervisors (BOS); Calvillo, Angela (BOS); Board of Supervisors (BOS)
Subject:	Coalition Letter Supporting Family Zoning Plan: File No. 250966
Date:	Monday, December 1, 2025 12:42:42 PM
Attachments:	Outlook-A black an.png Full BOS Coalition Letter of Support for San Francisco's Family Zoning Plan.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

Please find the attached letter on behalf of our undersigned organizations in support of the Family Zoning Plan, File No. 250966. Thank you.

All the best,

David Harrison *(He/Him)*
Director of Public Policy
(O) 415-352-8803 (C) 202-262-5860
San Francisco Chamber of Commerce
235 Montgomery Street, Suite 760
San Francisco, CA 94104

December 1, 2025

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

RE: Business Community Support for San Francisco's Family Zoning Plan

Dear Supervisors,

As leaders in the San Francisco business community, representing employers of all sizes and industries, we know that a strong economy depends on sufficient housing for workers and families. We, the undersigned organizations, write to express our strong support for Mayor Daniel Lurie's Family Zoning Plan.

San Francisco continues to face a severe housing shortage that impacts workers, families, and businesses across the city. Too many employees who power our economy are forced to live far from their jobs, enduring long commutes that strain families, limit career opportunities, and weaken connections to our neighborhoods. The Family Zoning Plan helps address this challenge by expanding opportunities for family sized housing in more neighborhoods while providing safeguards for small businesses and keeping San Francisco eligible for critical state housing and infrastructure funding.

Economic Benefits for Businesses of All Sizes

Building enough housing to meet our city's needs could generate nearly $5.6 billion dollars in new spending at local businesses. By concentrating new homes near commercial corridors, this plan will increase foot traffic, create opportunities for ground floor retail, and provide a stable customer base for neighborhood serving businesses. These benefits extend across industries,

strengthen our ability to attract and retain talent, and help ensure that San Francisco remains a competitive place to grow jobs.

Protecting and Supporting Small Businesses

We recognize that land use changes can raise important questions for small businesses. Importantly, the vast majority of future housing under this plan will be built on underutilized sites such as parking lots, gas stations, or vacant buildings. This will preserve existing storefronts while revitalizing parcels that present the best opportunities for redevelopment.

In the limited cases where relocation may be necessary, the Family Zoning Plan now includes adopted safeguards that give small businesses greater clarity and support. Supervisor Myrna Melgar's Small Business Displacement Program, which has now passed first reading, provides relocation payments, waived permit fees, and dedicated support to small and legacy businesses that may be affected by redevelopment related to the plan. The plan also requires early notification to commercial tenants as soon as a permit is pulled, giving businesses more predictability and time to plan for any potential changes.

In addition, the Planning Department has developed new incentives to ensure that ground floor retail in new buildings is functional, economically viable, and designed to support vibrant commercial corridors. These tools help facilitate tenant buildouts and encourage activated storefronts that strengthen neighborhood vitality.

Shared Vision for San Francisco's Future

The Family Zoning Plan is a critical step toward addressing our city's housing needs while ensuring that small businesses, large employers, and working families all have a path to thrive. By making it possible for more workers to live near their jobs, San Francisco will strengthen its workforce, reduce congestion and pollution from long commutes, and create a healthier and more equitable city for everyone. When our workforce can afford to live in our city, employers are better able to retain talent, reduce turnover, and build a stronger, more stable workforce.

We appreciate your leadership in approving the Family Zoning Plan and the accompanying small business protections. We stand ready to work alongside you in building a more economically inclusive, vibrant, and strong San Francisco.

Thank you for your consideration.

Sincerely,

San Francisco Chamber of Commerce
Rodney Fong, President & CEO

Bay Area Council
Matt Regan, Senior Vice President, Public Policy

SPUR
Sujata Srivastava, Chief Policy Officer

Advance SF
Wade Rose, President and CEO

Hospital Council Northern and Central California
Michon Coleman, Regional Vice President, San Francisco Section

Golden Gate Restaurant Association
Laurie Thomas, Executive Director

Building Owners & Managers Association San Francisco
John Bryant, CEO

SF New Deal
Simon Bertrang, Executive Director

San Francisco Apartment Association
Janan New, Executive Director

East Cut Community Benefit District
Andrew Robinson, Executive Director

Kate Robinson
Chair, San Francisco Benefit District Alliance

Ben Blieman
President, California Nightlife Association

Cynthia Huie
President, Small Business Commission

Sharky Laguana
Former President, Small Business Commission & CEO, Bandago

Teddy Kramer
CEO and Founder, NEON

Manny Yekutiel
Owner, Manny's

From:	Richard Drury
To:	Board of Supervisors (BOS); MandelmanStaff (BOS); ChanStaff (BOS); SherrillStaff; SauterStaff; MelgarStaff (BOS); ChenStaff; MahmoodStaff; DorseyStaff (BOS); FielderStaff; Waltonstaff (BOS); Carroll, John (BOS); CPC.SF.Housing.Choice; CPC.FamilyZoningCEQA; Shum, Ryan (CPC)
Cc:	Lori Brooke
Subject:	Family Zoning Plan Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985
Date:	Tuesday, December 2, 2025 9:02:59 AM
Attachments:	2025.12.02.SF Rezone Supoplemental BOS ComLtr-PDF w Exhibit.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Board of Supervisors:
Attached please find the supplemental comments of Neighborhoods United SF concerning the San Francisco "Family Zoning Plan." Board of Supervisors December 2, 2025. Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985.
Thank you for considering our comments, and please include these comments in the record for this matter.
Richard Drury

--
Richard Drury
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
(510) 836-4200
richard@lozeaudrury.com

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
richard@lozeaudrury.com

BY E-MAIL

December 2, 2025

Board President Rafael Mandelman and
Honorable Supervisors
San Francisco Board of Supervisors
Attn: Angela Calvillo, Clerk of the Board
Land Use and Transportation Committee c/o Clerk John Carroll
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Board.of.Supervisors@sfgov.org
mandelmanstaff@sfgov.org
ChanStaff@sfgov.org
SherrillStaff@sfgov.org
SauterStaff@sfgov.org
MelgarStaff@sfgov.org
ChenStaff@sfgov.org
MahmoodStaff@sfgov.org
DorseyStaff@sfgov.org
FielderStaff@sfgov.org
waltonstaff@sfgov.org
John.Carroll@sfgov.org
Lisa Chen, sf.housing.choice@sfgov.org
Ryan Shum, CPC, cpc.FamilyZoningCEQA@sfgov.org; ryan.shum@sfgov.org

RE: Comment on CEQA Addendum for San Francisco "Family Zoning Plan."
Board of Supervisors December 2, 2025.
Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985

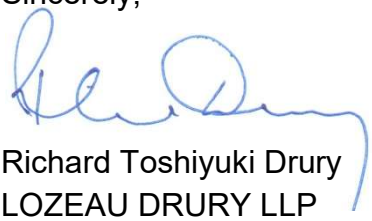
President Mandelman and Honorable Supervisors:

I am writing on behalf of Neighborhoods United SF, a consortium of San Francisco neighborhood and community groups representing thousands of San Francisco residents, concerning the so-called San Francisco "Family Zoning Plan" ("Rezone"). This letter supplements our filing yesterday in which we requested that the Board defer any decision on the Rezone until the City Planning Department prepares a Supplemental Environmental Impact Report ("SEIR").

We attach hereto the shadow "heat map" prepared by Adam Noble of FastCast showing that the Rezone will have dramatic shadow impacts on Joe DiMaggio Park. This is a zero-tolerance park under the City's Prop M (Planning Code Section 295). This is a new significant impact of the Rezone that must be analyzed in an SEIR, along with the

impacts discussed in yesterday's letter. We urge the City to prepare a SEIR to consider feasible mitigation measures to reduce the Rezone's impacts, and also to consider feasible alternatives, such as placing the proposed 4,000 additional units in specific locations, rather than upzoning entire swaths of the city in hopes that the 4,000 units will be built somewhere within the upzoned areas. We do not need to destroy the City to save it. Instead, the necessary new development can be place in areas of the City where it will not destroy rent-controlled housing and where it will not destroy functional, urban communities.

Sincerely,

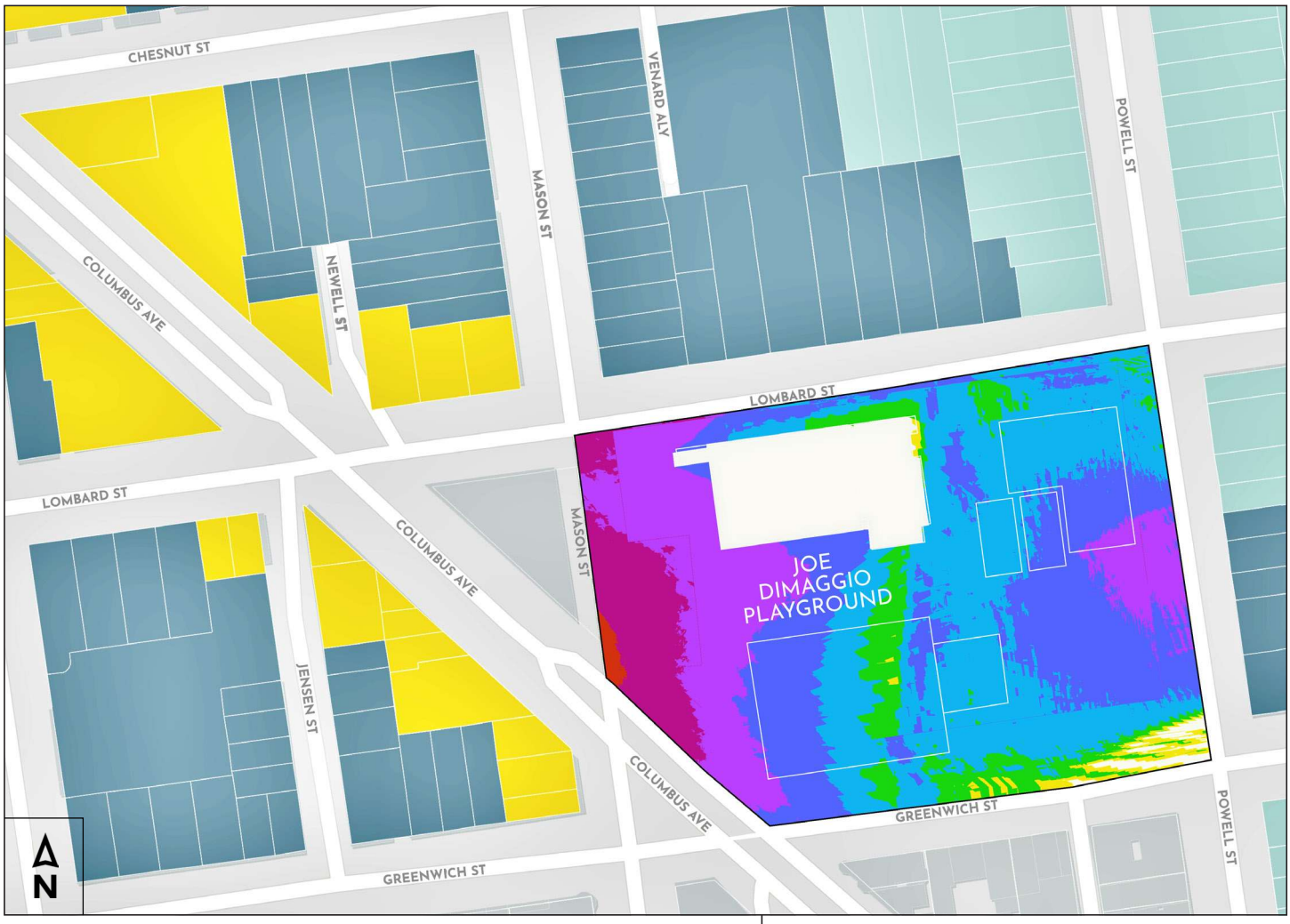


Richard Toshiyuki Drury
LOZEAU DRURY LLP

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

EXHIBIT B



NET NEW SHADOW LOCATIONS & DURATIONS

Full Year Distribution

Duration Range of Net New Shadow

Under 2 min/day	(under 13 hrs/year)
2 - 4 min/day	(13 - 25 hrs/year)
4 - 8 min/day	(25 - 49 hrs/year)
8 - 16 min/day	(49 - 98 hrs/year)
16 - 32 min/day	(98 - 195 hrs/year)
32 - 64 min/day	(195 - 390 hrs/year)
64 - 128 min/day	(390 - 779 hrs/year)
Over 128 min/day	(over 779 hrs/year)

FULL YEAR

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

Joe DiMaggio Playground*

Proposed Local Program Height Limits

40’

50’

65’

Shadow Fan is cropped to park boundaries

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JUNE 21

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JUNE 28

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JULY 5

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

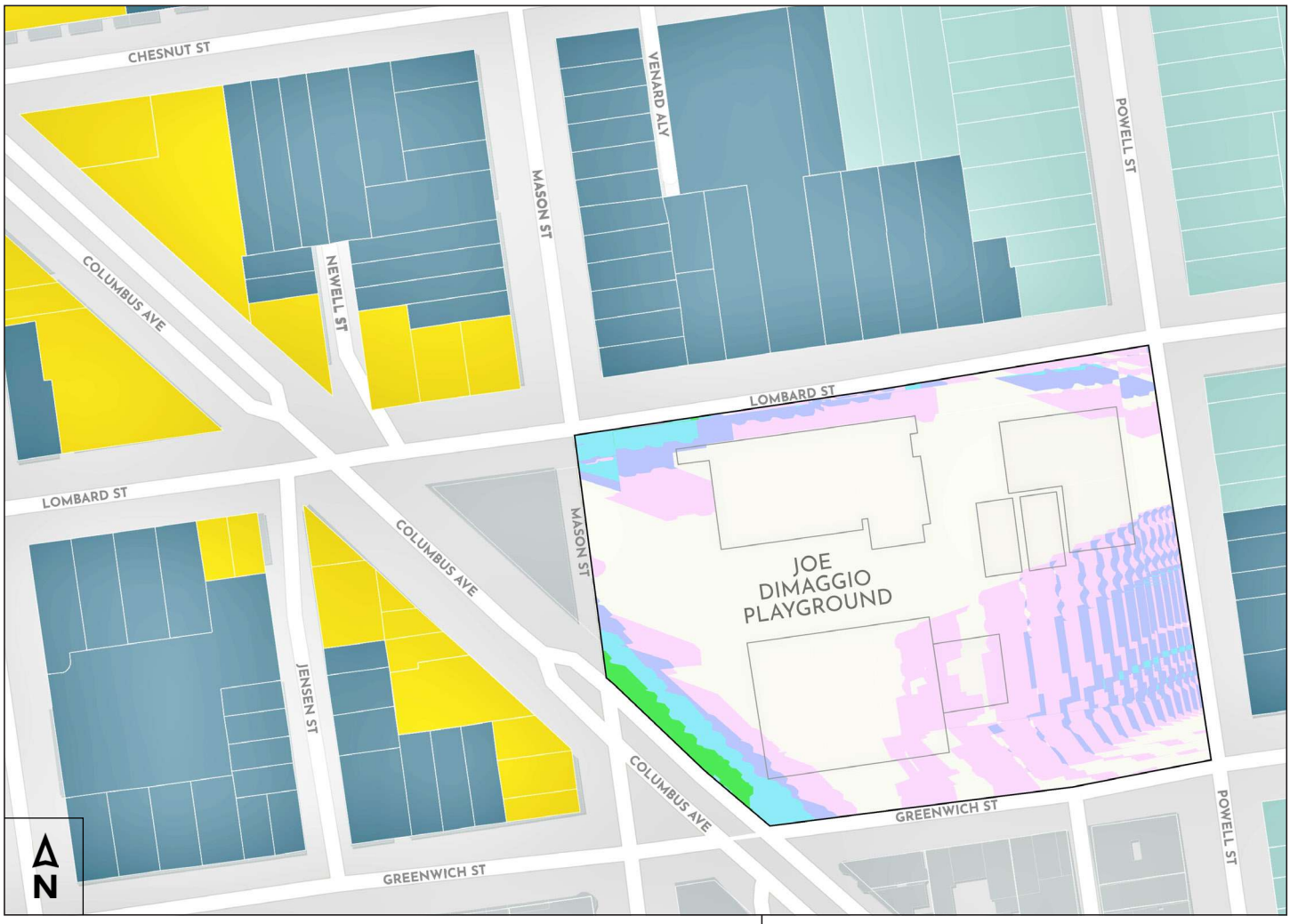
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JULY 12

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

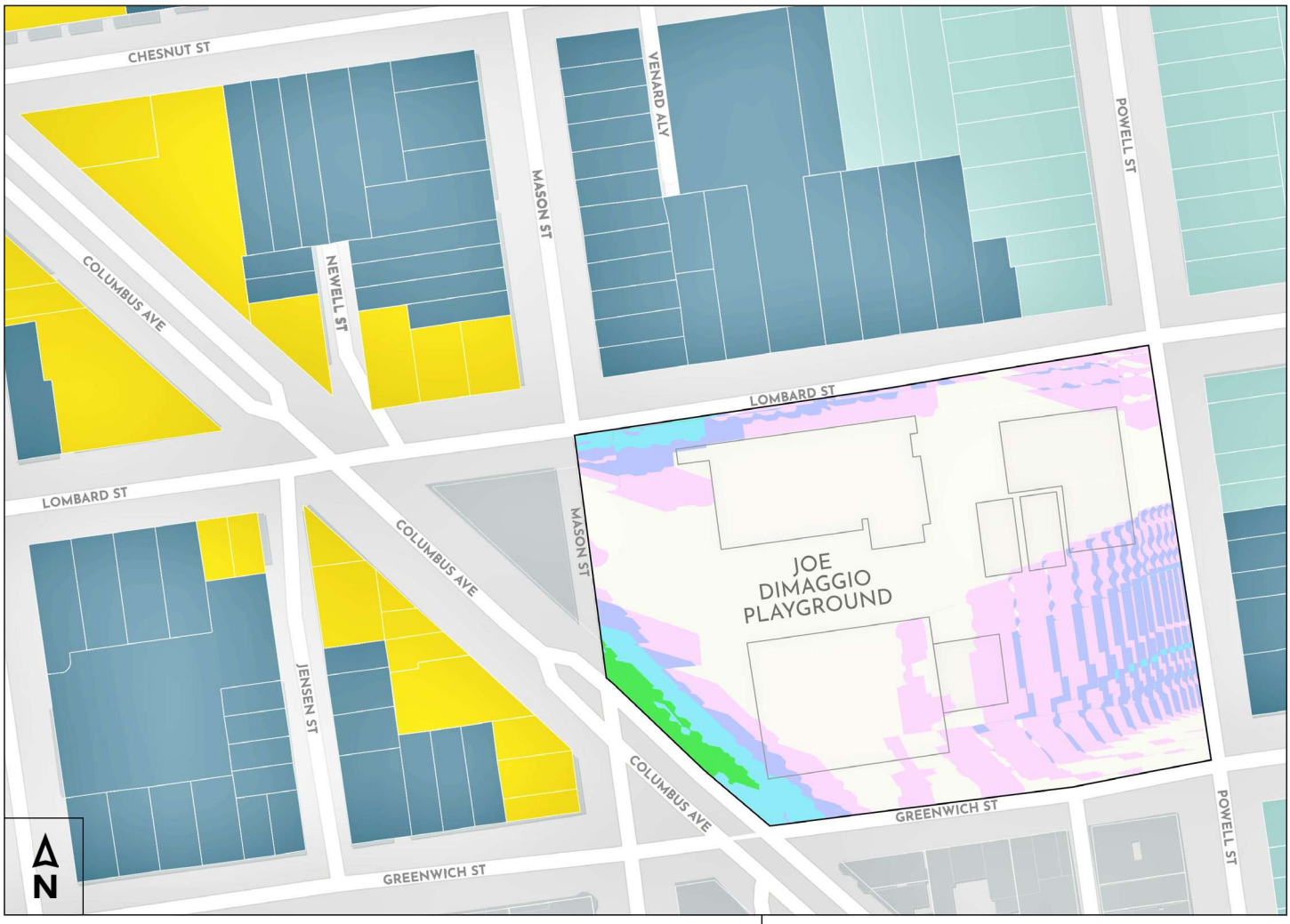
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JULY 19

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

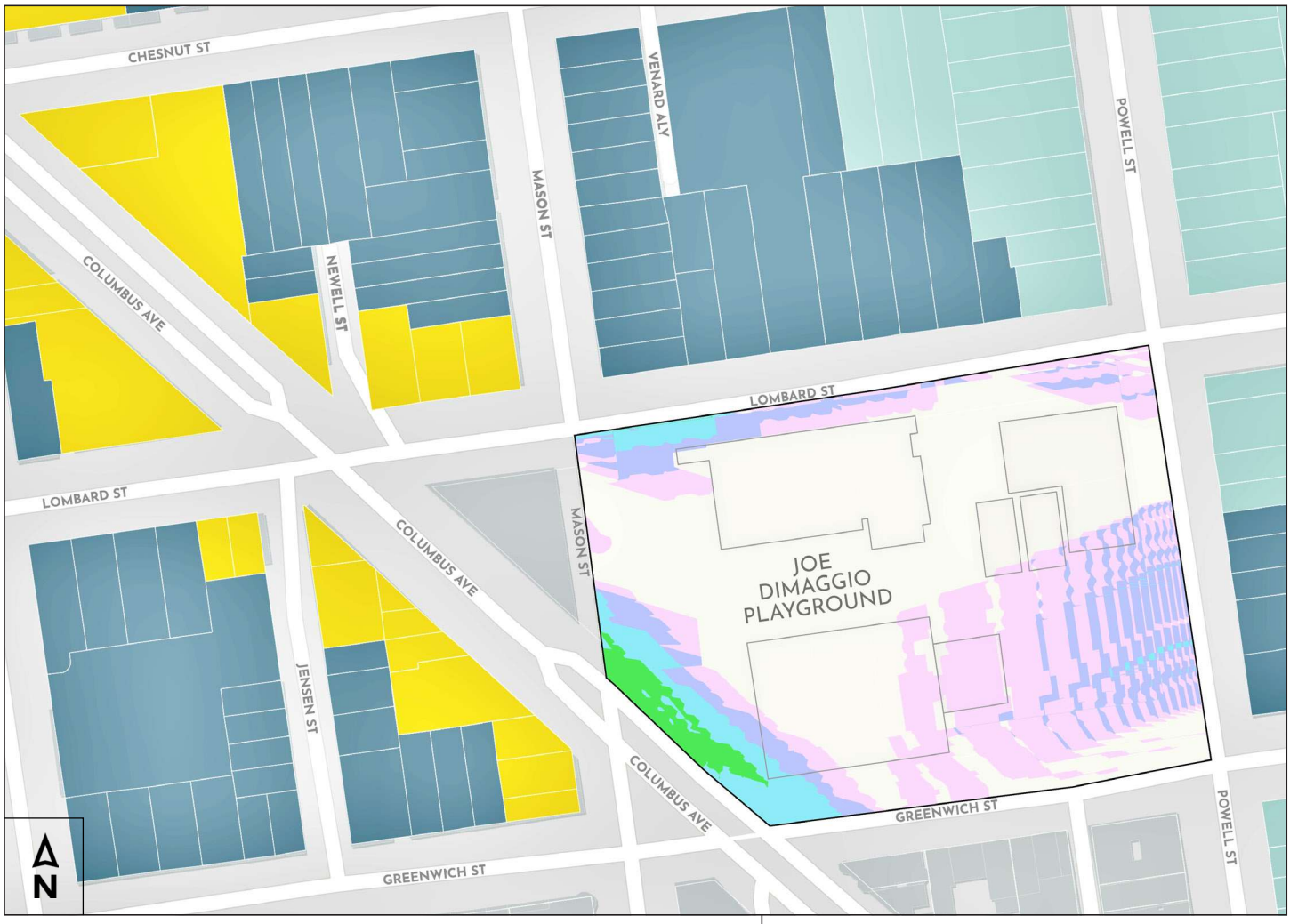
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

JULY 26

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

AUGUST 2

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

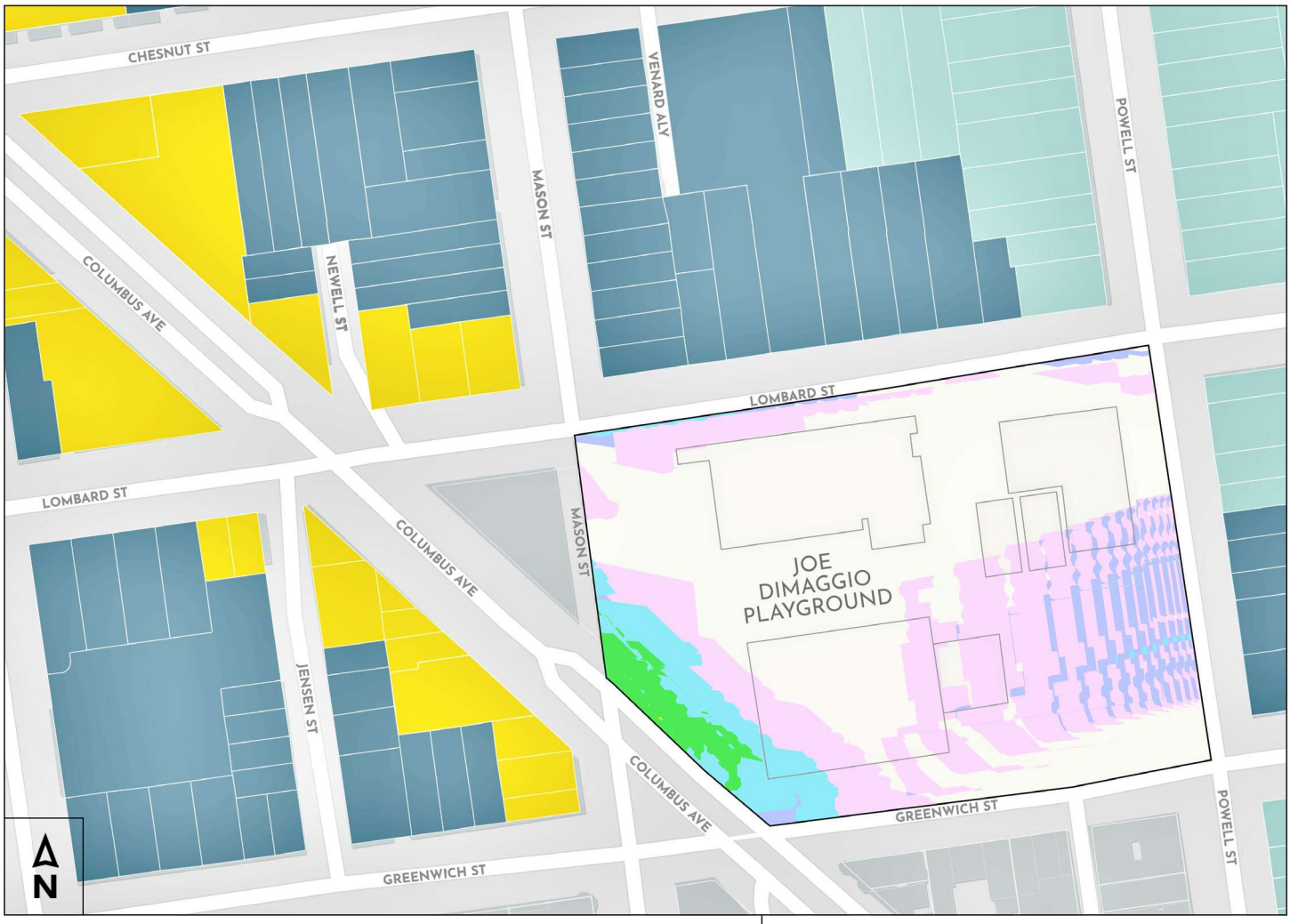
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

AUGUST 9

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

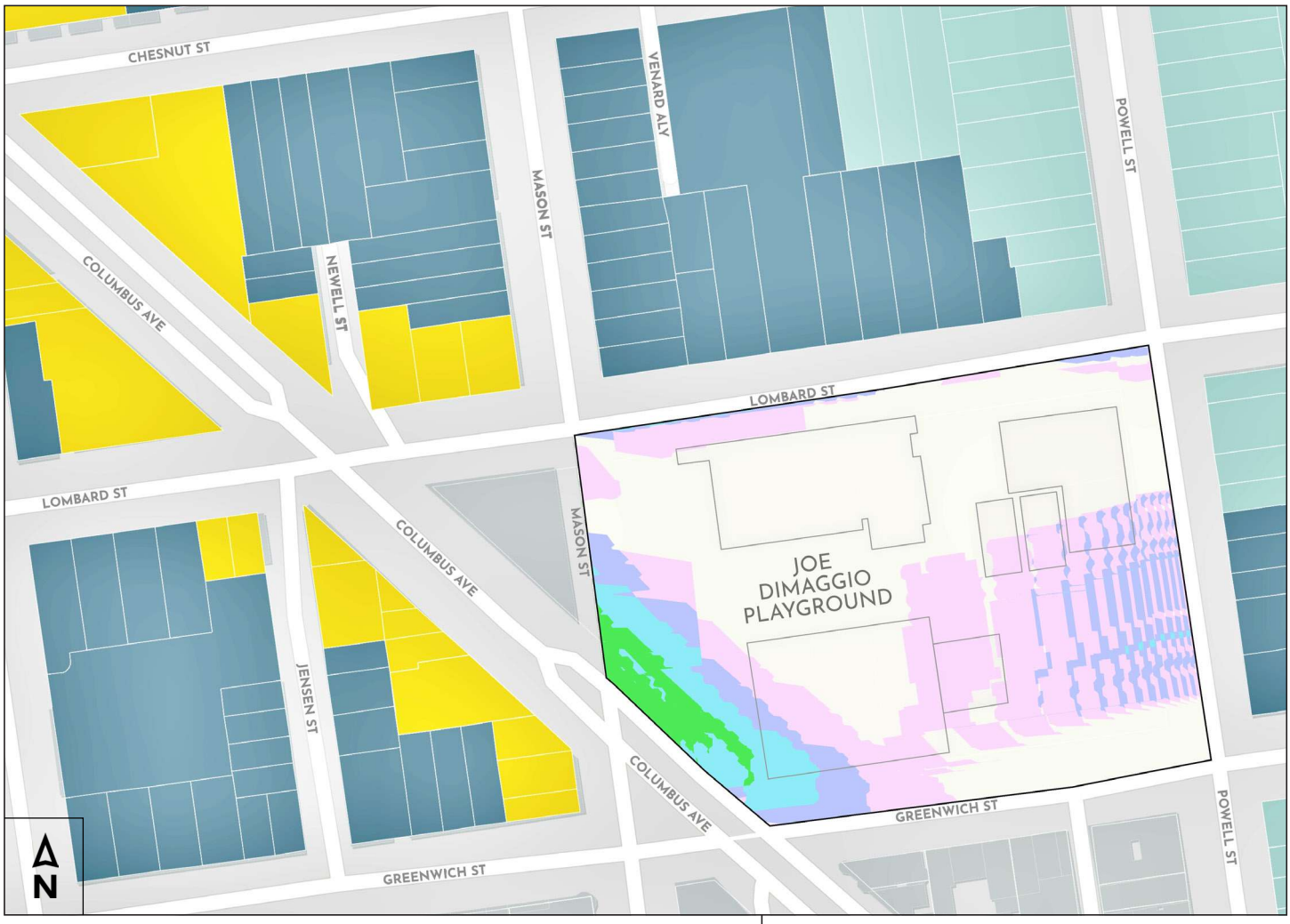
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

- Over 16 hr
- 8 hr - 16 hr
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- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

AUGUST 16

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

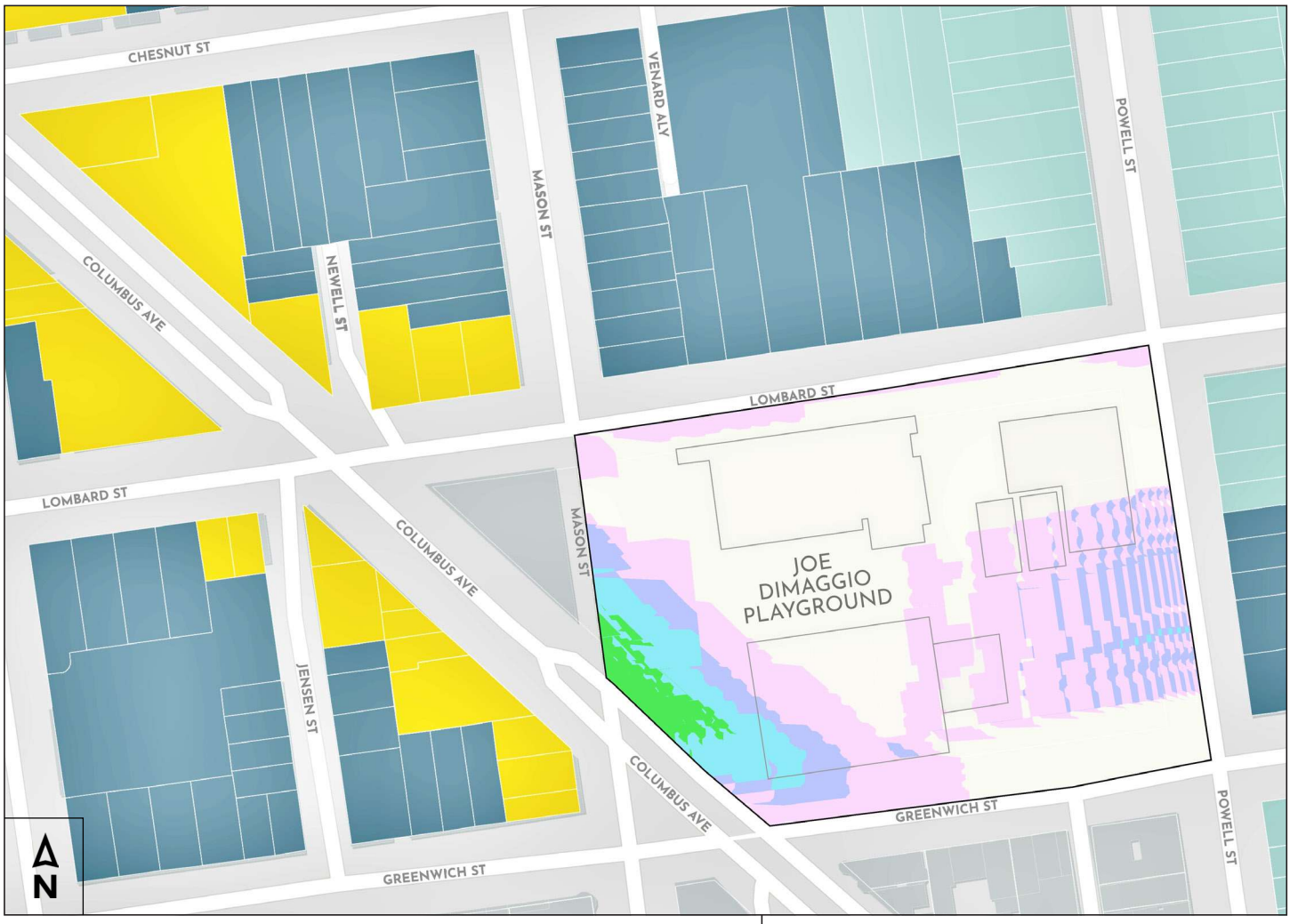
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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AUGUST 23

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

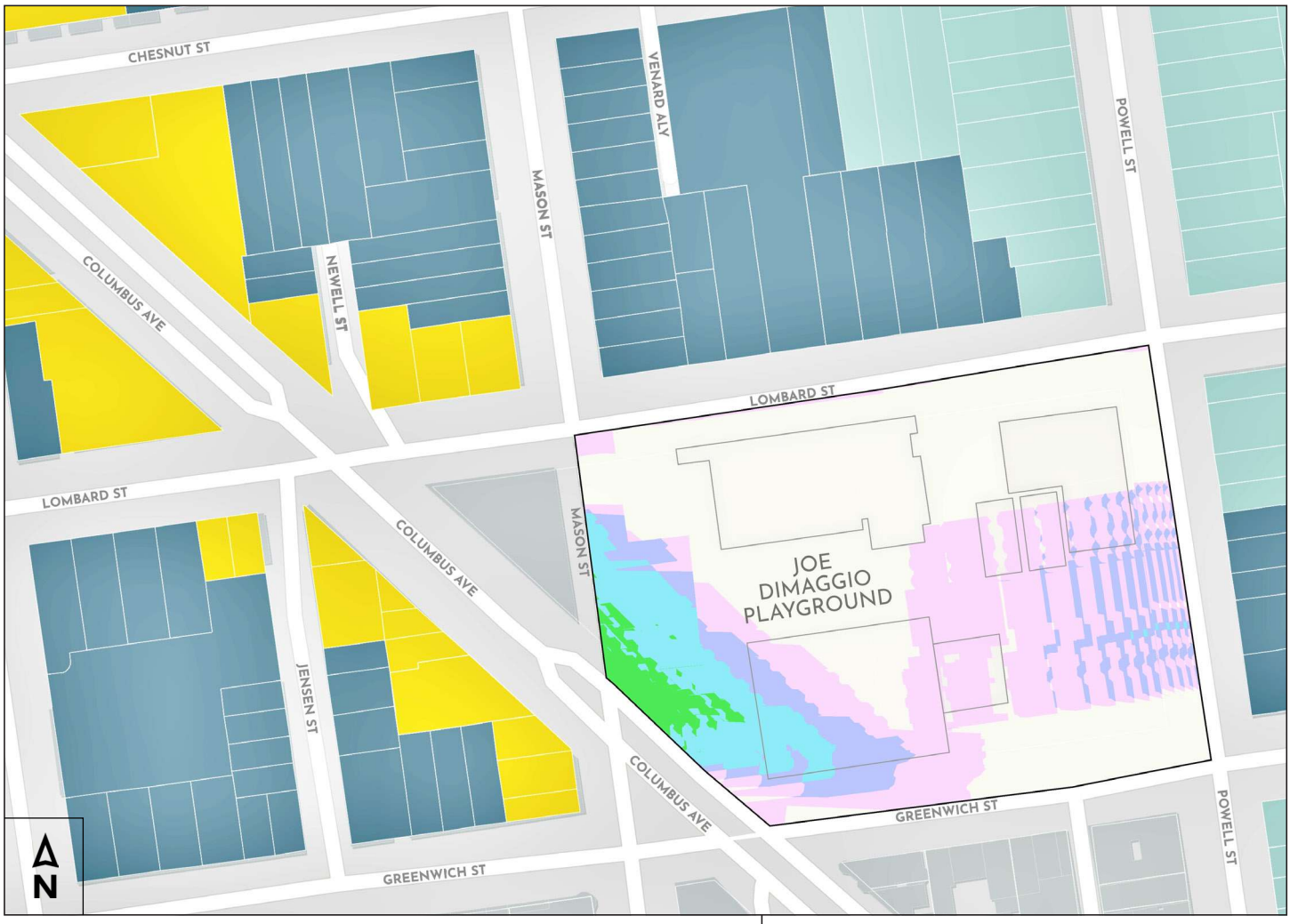
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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- 1 min - 15 min

AUGUST 30

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

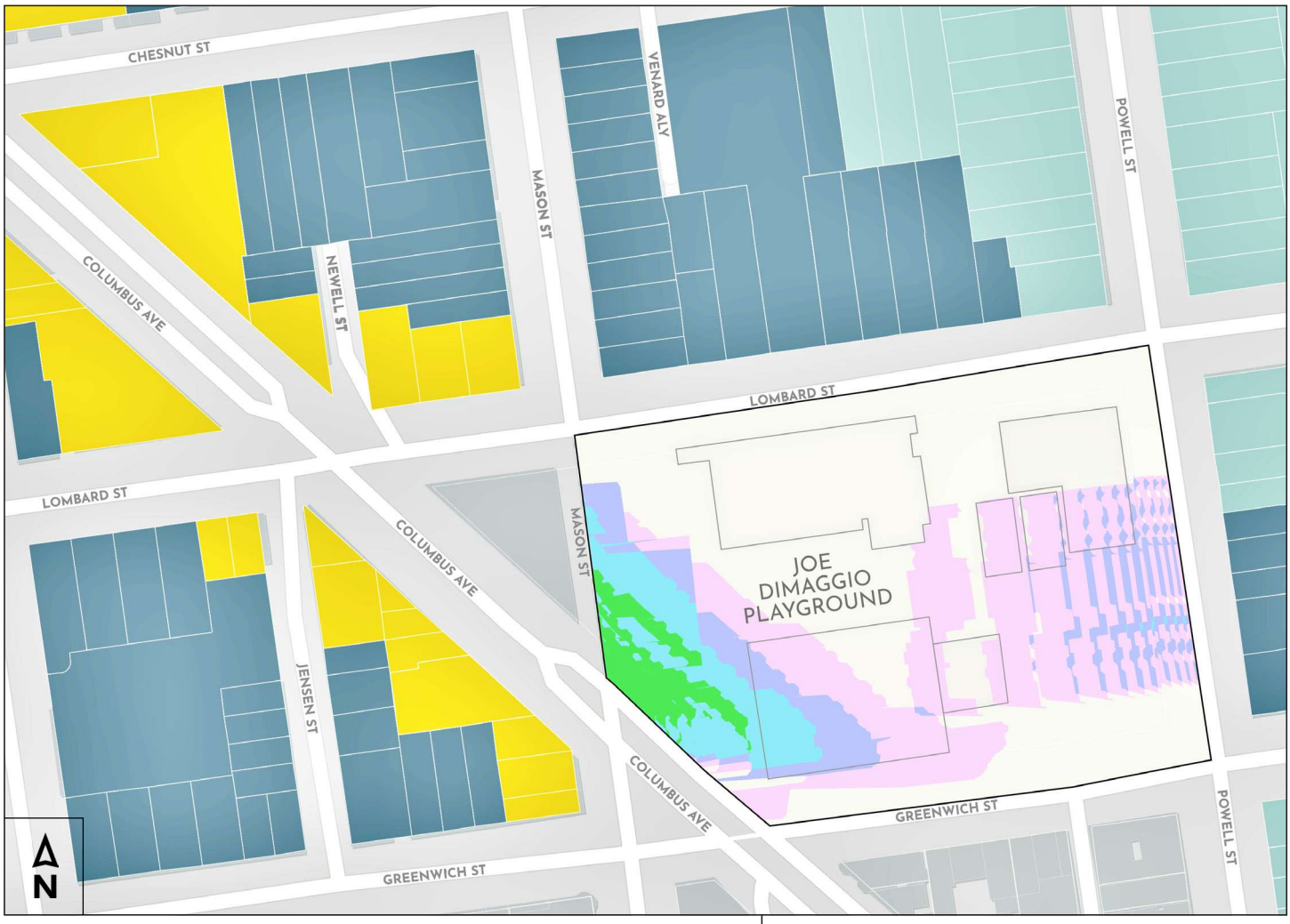
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



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SEPTEMBER 6

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

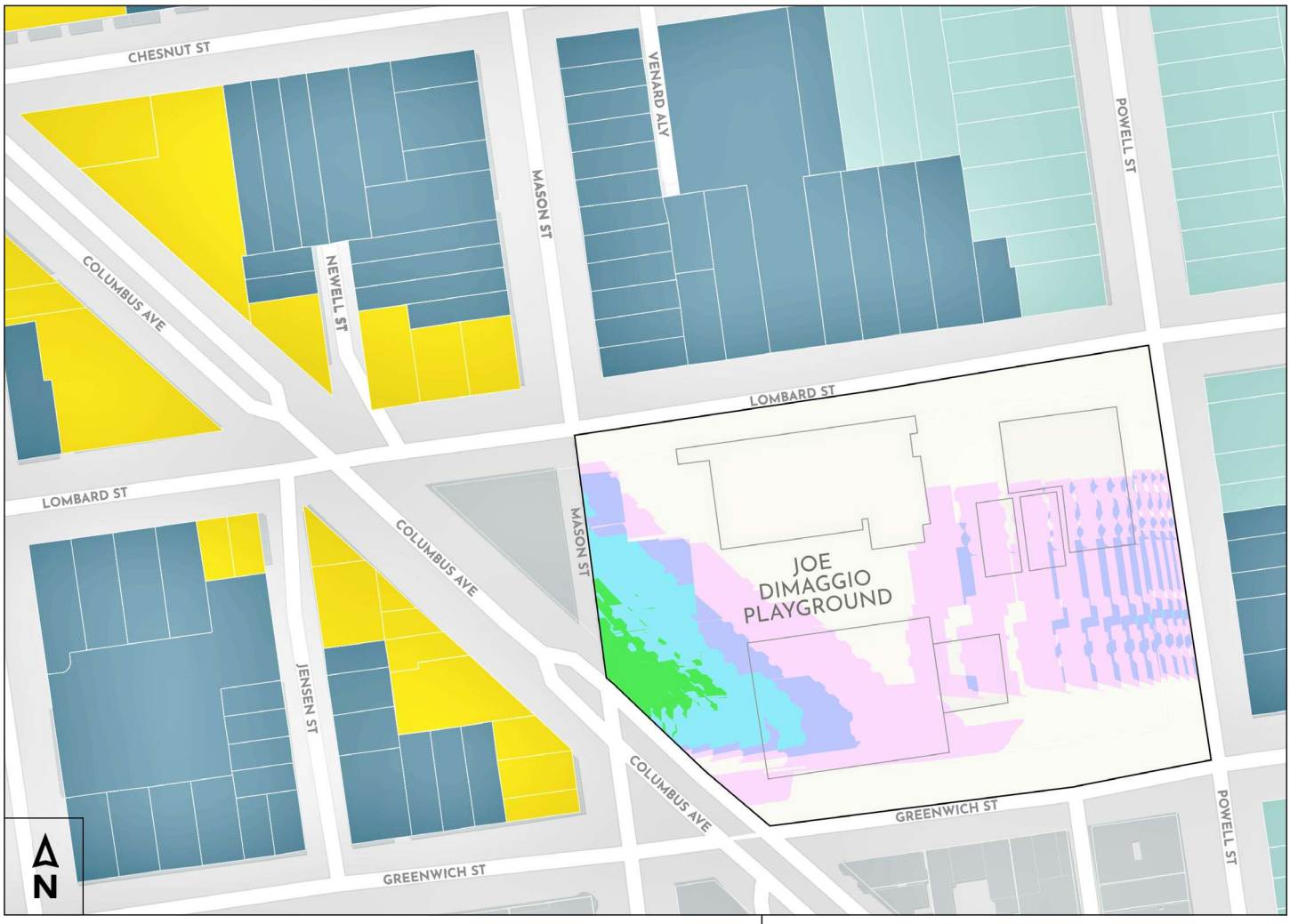
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



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SEPTEMBER 13

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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SEPTEMBER 20

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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SEPTEMBER 27

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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OCTOBER 4

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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- 1 min - 15 min

OCTOBER 11

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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OCTOBER 18

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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OCTOBER 25

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

Duration Range of Net New Shadow

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NOVEMBER 1

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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NOVEMBER 8

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

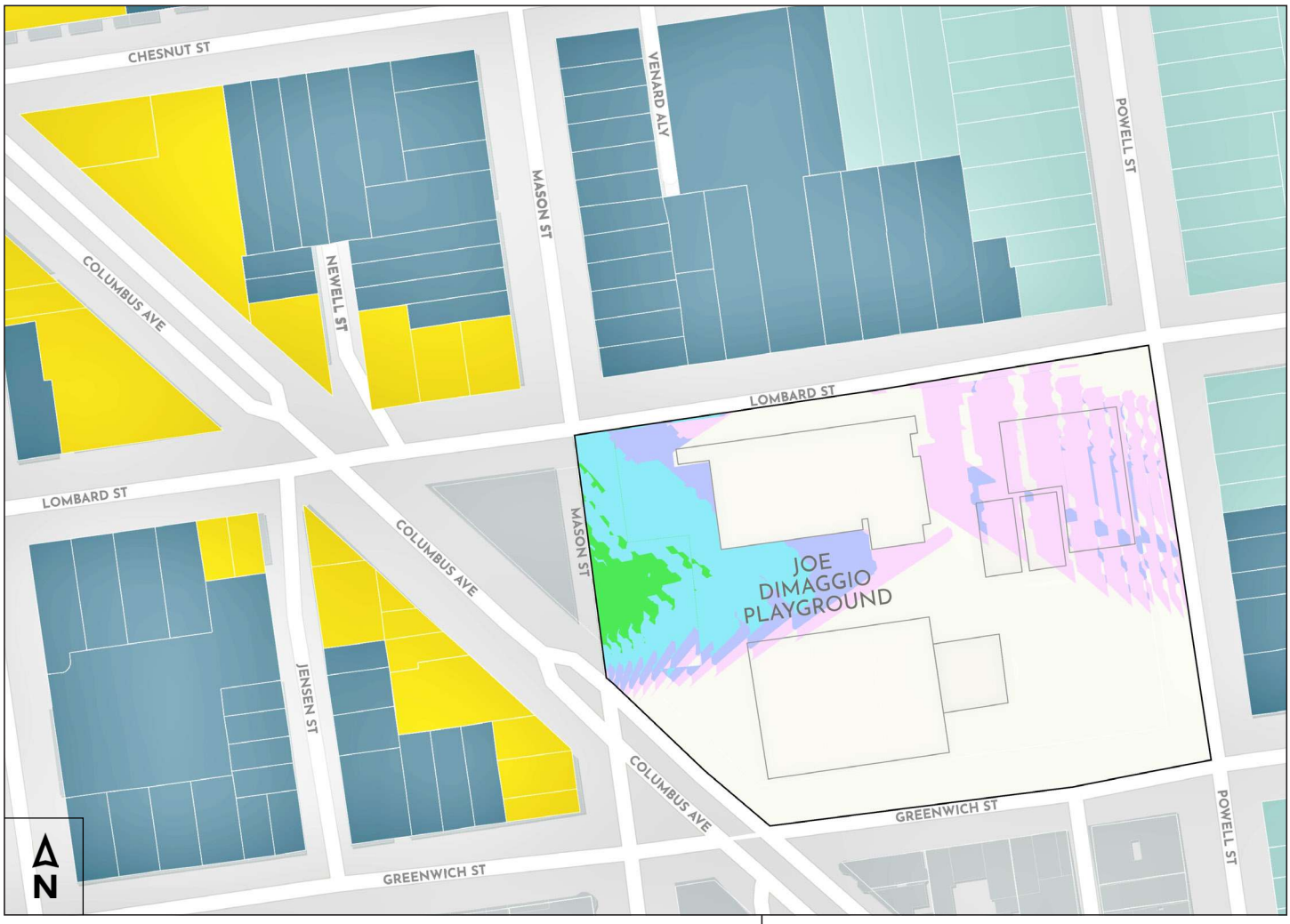
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



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NOVEMBER 15

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

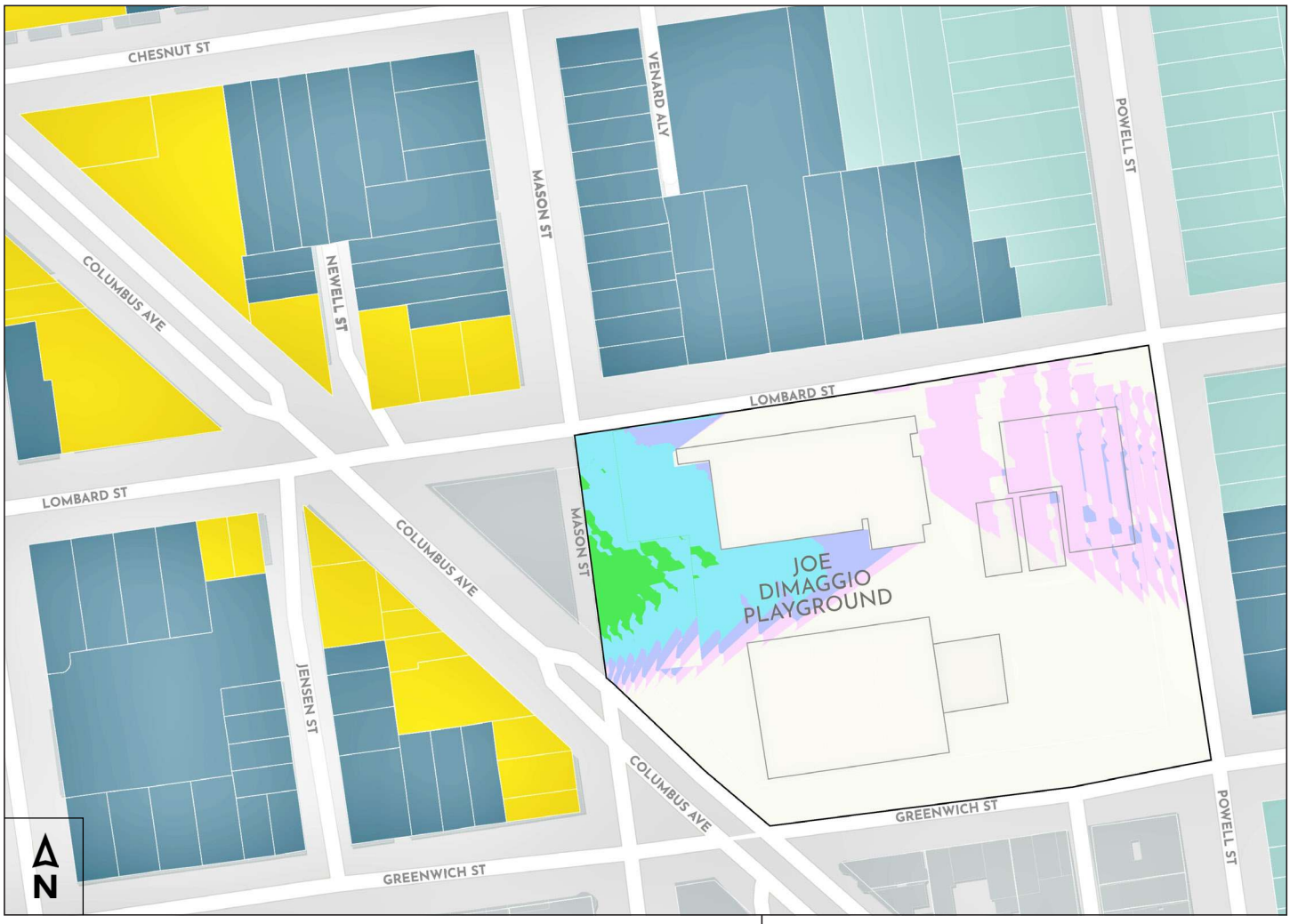
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



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NOVEMBER 22

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
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- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

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NOVEMBER 29

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

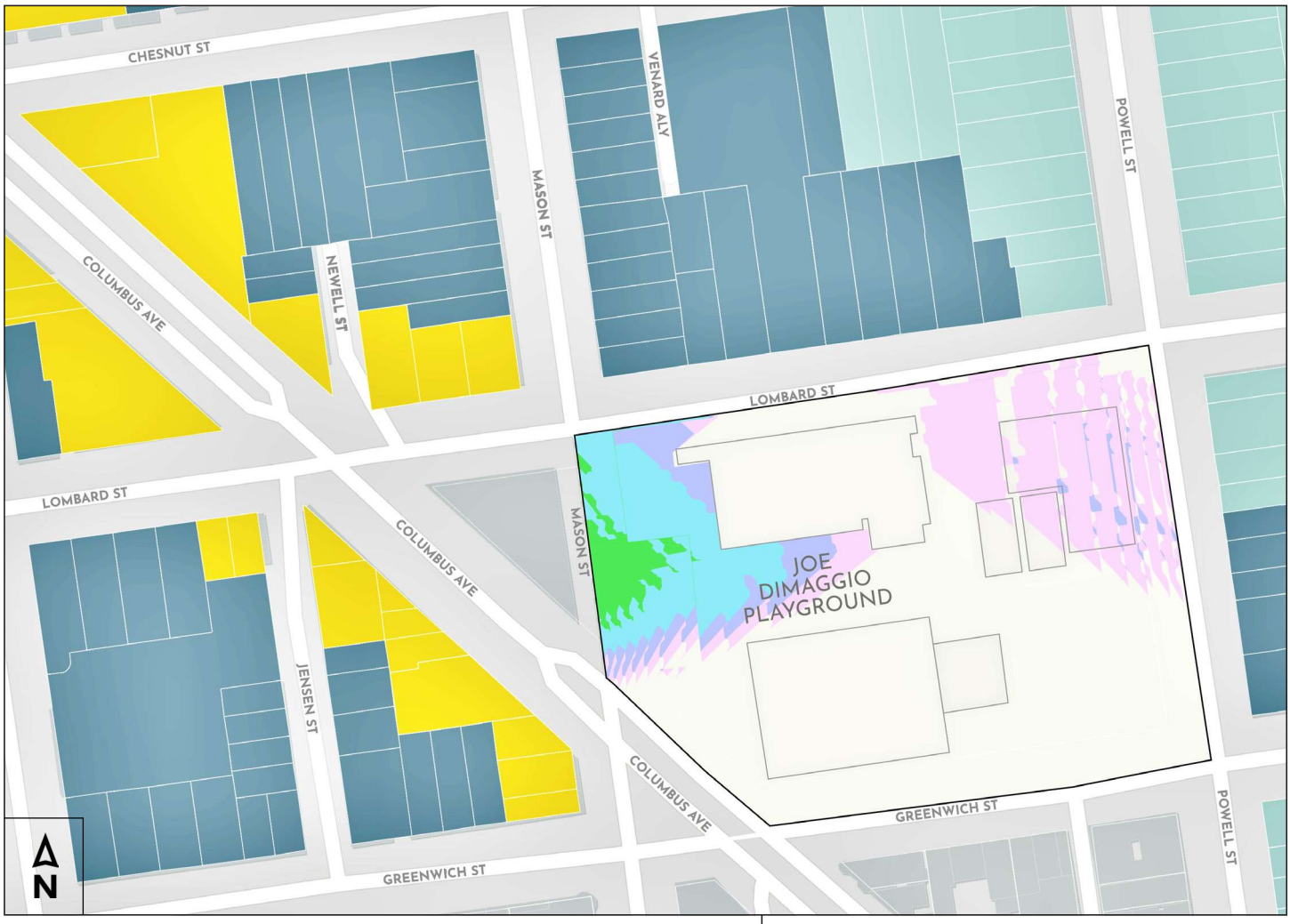
- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day



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DECEMBER 6

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
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FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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DECEMBER 13

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

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- 65’

FAMILY ZONING SHADOW ANALYSIS

Joe DiMaggio Playground, Single Day

NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

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DECEMBER 20

SHADOW FAN ANALYSIS

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

From:	Bruce Agid
To:	Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Sherrill, Stephen (BOS); Walton, Shamann (BOS); Chan, Connie (BOS); Sauter, Danny (BOS); Dorsey, Matt (BOS); Fielder, Jackie (BOS); Alan.Wong1@sfgov.org; Mandelman, Rafael (BOS)
Cc:	Meaghan Mitchell; Tyra Fennell; Sean Karlin; Amerika Sanchez; Charley Goss; Derek Lee; Kurt Grimes; Chris Chang; Maika Pinkston; Latoya Pitcher; Spencer Lam; Eric Dew; Mark Malouf; Alan Tsui; Rachael Tanner; Gary Pegueros; Chanel Blackwell; Elijah Ball; Courtney Sid; sliubettencourt@gmail.com; JiLon Li; Rupali Singhal; Carroll, John (BOS); Calvillo, Angela (BOS); Herrera, Ana (BOS); Burch, Percy (BOS); Yan, Calvin (BOS); Andrews, Michelle (BOS); Tam, Madison (BOS); Rosas, Lorenzo (BOS); Low, Jen (BOS); Fieber, Jennifer (BOS); Cooper, Raynell (BOS); Sciammas, Charlie (BOS); Ho, Calvin (BOS); DorseyStaff (BOS); Waltonstaff (BOS); Mathew Castillon; Lurie, Daniel (MYR); Thongsavat, Adam (MYR); Zou, Han (MYR)
Subject:	San Francisco Eastern Neighborhoods Democratic Club (SFENDC) Support for Mayor Lurie"s Family Zoning Plan
Date:	Tuesday, December 2, 2025 9:01:55 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

December 2, 2025

RE: Support Mayor Lurie’s Family Zoning Plan

Dear Members of the Board of Supervisors,

The Board of the Eastern Neighborhoods Democratic Club (ENDC) supports the passage and adoption of Mayor Lurie’s Family Zoning Plan.

This proposal plans to build more housing for San Franciscans while ensuring we can control our own destiny by maintaining local land use controls. Without the Family Zoning Plan, San Francisco will face the Builder’s Remedy as well as fines and loss of ~$100 million in funding for transit and housing. Furthermore, this plan incentivizes family-sized homes of at least two, three, or more bedrooms. These types of homes help more families stay in San Francisco.

The plan aligns with ENDC's Mission & Vision. The San Francisco Eastern Neighborhoods Democratic Club (ENDC) was established by residents of San Francisco’s Supervisorial Districts 3, 6, and 10 to organize voters and provide a discussion and educational forum to address the most pressing issues facing the eastern neighborhoods of our City.

The ENDC provides a Democratic political voice to advocate an urbanist-equity platform (a focus on creating complete communities) with twin goals of keeping current residents and families in San Francisco while welcoming newcomers. The Family Zoning Plan aligns firmly with these values.

We are proud to support the Family Zoning Plan, which incorporates many important accepted amendments, and urge the Board of Supervisors to adopt the plan without delay.

Thanks in advance,

Bruce Agid
President, ENDC on behalf of the Board of ENDC

From:	Howard
To:	Carroll, John (BOS); Chen, Lisa (CPC); Shum, Ryan (CPC); CPC.SF.Housing.Choice; FamilyZoningCEQA@sfgov.org
Subject:	UPZONING: ANALYSIS: PERFECT PLANNING = ICONIC BEAUTY + HOUSING
Date:	Tuesday, December 2, 2025 7:28:54 AM
Attachments:	~~~~PERFECT PLANNING = ICONIC BEAUTY + HOUSING 12-25.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

FOR HEARINGS ON UPZONING PLAN
TO: Board of Supervisors
CC: Mayor Lurie/ Office, Planning Commission/ Staff
ATTACHED: PERFECT PLANNING = ICONIC BEAUTY + HOUSING

An entertaining and informative analysis of the history of Waterfront Land-Use Battles, development fights, upzoning, housing options, affordable housing around the world and photos.
Best Regards, Howard Wong, AIA
P.S.: Please include in Board Package---online and printed (if possible) for public education.

PERFECT PLANNING = ICONIC BEAUTY + HOUSING

OPPOSE WATERFRONT UPZONING *Please share this!*

SEE BELOW: HISTORY OF SF WATERFRONT LAND-USE BATTLES:

PROTECT WATERFRONT BEAUTY AND HISTORIC NEIGHBORHOODS AS ECONOMIC ASSETS
San Francisco's waterfront/ hilltop beauty is priceless. Environmental capital, like physical/ visual links to the Bay, has quantifiable value. The City's Mediterranean beauty differentiates it from most cities. Tourism attracts 23 million visitors and $9 billion/ year. Public vistas fuel a real estate industry of up to $10 billion/ year. Conservatively, waterfront beauty has a $2 billion valuation/ year---for perpetuity.

History makes the case for Voter Approval of waterfront development/ height increases
Generations of San Franciscans have fought to protect the beauty and scale of the northern waterfront. Upzoning at the northern waterfront would override General Plans, urban design/ environmental elements, planning priorities, design guidelines, settled law, ballot measures, legislation, codes, and voter advocacy for a Mediterranean scale---with building heights tapering gently upward to hilltops.

Planning codes have reinforced the waterfront's 40-foot height limit as a benchmark for tapering heights---protecting visual corridors to the bay. Public and legal directives have elevated environmental beauty as a priority, aspiring to the beauty of Venice, Florence, Santorini, Paris and great places that have protected their timeless treasures and World Heritage Sites---actual and potential.

HOUSING: SUPERLATIVE OPTIONS *Please share this!*

INSTEAD OF PLANNERS, HIRE MATHEMATICIANS AND FINANCIERS TO CREATE NEW HOUSING.
San Francisco's Chief Economist deems the SF Upzoning Plan as unrealistic. ***Why approve a deleterious upzoning plan, harming neighborhoods and waterfronts, when better options exist?*** Throughout the world, cities/ countries/ people have built vast amounts of affordable housing for their growing populations. Besides, San Francisco has already built, entitled more projects, and forecasts more development than almost any city in the region and state.

Mathematicians can finetune hypotheses and calculate housing construction accurately.
Depending on the timeline, completed projects, in-progress projects, entitled projects, proposed projects (more every day), untapped zoning capacity, infill development, availability of public land, new financing plans, new area/ neighborhood plans, and revised incentives/ housing types/ unit sizes/ densification, San Francisco can likely meet its RHNA (Regional Housing Needs Allocation)---without flailing citywide upzoning. Rather than number of housing units, the focus should be on the number of people housed.

Financiers can coalesce all funding to effectively build housing: $20 billion MTC Regional Affordable Housing Bond (2028 as a revolving fund), local/ state housing bonds, grants, trust funds, tax credits, tax increment financing, low-interest loans, public banks, nonprofits, philanthropy, partnerships, rent subsidies, and more. Many countries have affordable housing strategies and programs---worth emulating. ***Affordable housing is not for lack of zoning, but lack of comprehensive planning.***

DO THE MATH: HOUSING TAKES MANY FORMS: After the 1906 Earthquake, 250,000 San Franciscans were homeless (60% of the population)---quickly housed in tens/t camps and tiny redwood cottages. Today, the homeless instinctively gather in encampments, RV/ car clusters, for community and self-support. As seen throughout the world, affordable housing can take the form of cooperative housing, micro-housing, shared housing, land trusts, accessory units, modular dwellings, single-room occupancies, boarding houses, public housing, dual-use spaces, and informal communities (at least for the near/ short term). Rio de Janeiro's favelas are naturally-occurring low-income squatter housing---a normal human response to homelessness. 35% of Lima's population live in squatter settlements and 50% are employed in informal jobs. Around the world, 1 billion people live in slums or other informal settlements.

AFFORDABLE HOUSING IS A PUBLIC POLICY CHOICE. Government has economic tools to invest in land, utilize public property, zone for public benefits, provide public services, incentivize smaller/ plentiful dwellings, provide flexibility in housing, give tax incentives, prioritize approvals and permitting. Not inconceivable, like China and forty other countries, government can build new cities and towns---on public land. China has built hundreds of new cities, including many with one million residents. ***The region and the state can carry its housing fair share, not just the 49 square miles of San Francisco.***

RENTCHAMBER: The Top 10 Countries with Exceptional Housing Policies
https://rentchamber.com/the-top-10-countries-with-exceptional-housing-policies/
WIKIPEDIA: Affordable Housing by Country:
https://en.wikipedia.org/wiki/Affordable_housing_by_country

GUARDIAN: The social housing secret: how Vienna became the world's most livable city
https://www.theguardian.com/lifeandstyle/2024/jan/10/the-social-housing-secret-how-vienna-became-the-worlds-most-livable-city
NPR: Could this city be the model for how to tackle the housing crisis and climate change?
https://www.npr.org/2025/06/15/nx-s1-5400642/affordable-housing-environment-vienna-climate-change
HOUSING PERSPECTIVES: What Can We Learn from the Dutch Social Housing System?
https://www.jchs.harvard.edu/blog/what-can-we-learn-dutch-social-housing-system
ASSEMBLE PAPERS: A primer on social housing in Amsterdam
https://assemblepapers.com.au/2018/12/13/amsterdam-social-housing-a-primer/
ROUTE FIFTY: Hungry for affordable housing, communities turn to land trusts **https://www.route-fifty.com/management/2024/09/hungry-affordable-housing-communities-turn-land-trusts/399784/?oref=rf-today-nl&utm_source=Sailthru&utm_medium=email&utm_campaign=Route%20Fifty%20Today:%20September%2025%2C%202024&utm_term=newsletter_rf_today**
BLOOMBERG: Why Singapore Has One of the Highest Home Ownership Rates
https://www.bloomberg.com/news/articles/2020-07-08/behind-the-design-of-singapore-s-low-cost-housing?cmpid=BBD102120_CITYLAB&utm_medium=email&utm_source=newsletter&utm_term=201021&utm_campaign=citylabdaily

WATERFRONT BEAUTY = BEST ECONOMICS ***Please share this!***

HISTORY: SF WATERFRONT LAND-USE BATTLES

Over time, by tapering heights downward towards the waterfront, public vistas and San Francisco's hills/ beauty will be preserved for all---an economic asset that attracts 23 million visitors and $9 billion per year.

SAN FRANCISCO HAS THWARTED DARWINIAN MARKET FORCES, which threaten prime waterfront sites for obstructive development. Big money is spent to push projects by the few who benefit financially---developers, contractors, consultants, public relations firms, city staff, politicians, and groups that reap donations, fees, payments, and wages. Instead, citizens/ height limits/ codes have protected our Mediterranean village-like character for all.

SAN FRANCISCO'S WATERFRONT BATTLES led to protective tapering height limits, which preserve public vistas and a Mediterranean village-like beauty for everyone. Powerful special interests attempt to override codes---to gain extraordinary favors. Each code exemption is used to justify subsequent height increases----a never-ending ratcheting upward. Learning from history, we can better appreciate the waterfront's esthetic and economic value.

The Fontana Towers led to the 40-foot height limit on the waterfront.

The Fontana Towers battle stopped five other high-rises at Aquatic Park.

San Francisco's Freeway Revolt started a national movement.

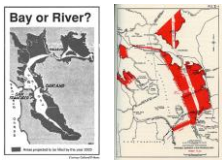
The Embarcadero Freeway was stopped at Broadway---in mid-construction.

The Embarcadero Freeways demolition opened the waterfront.

Freeway plans wrapped around the entire waterfront and throughout the city.

WPA Freeway Plan, around northern waterfront---and over Columbus Ave.

The freeway wall along the waterfront was a near reality.



"Save The Bay" map and Reber Plan for bay infill.

Citizen activists and founders of "Save The Bay": Esther Gulick, Sylvia McLaughlin, Catherine Kerr.

HISTORY TEACHES US that many design options exist for any site---like fully code-compliant alternatives or open space. After contentious debates, better designs often result.
FOUNDSF: The Fontana Towers and Waterfront Battle.
http://foundsf.org/index.php?title=Height_Limit_Revolt_Saves_Waterfront_Vistas
Residents of Russian Hill and Attorney Casper Weinberger (a Republican conservationist) stopped towers along the waterfront. A coalition fought for the waterfront 40-foot height limits. Later, height limits on Russian Hill were passed.

Bridge and large development proposed adjacent to Telegraph Hill---through North Beach.

Bridge and freeways proposed atop Telegraph Hill.

The Rush Bridge from Telegraph Hill had three stories of traffic lanes.

Proposed bridge from Telegraph Hill to Angel Island & Tiburon---stopped by Washington officials.

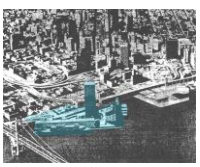
Russian Hill: Ten years after 40-foot height limit.

Ferry Building Project (1968) with helipad atop roof.

World Trade Center (1950) demolishes Ferry Building.

World Trade Center's terraced high-rises at waterfront.

Proposed 30-story skyscraper at waterfront.



U.S. Steel Building Complex---South of Ferry Building.

Embarcadero Crescent (1961): Ferry Building to Aquatic Park.

Embarcadero Crescent (1961): Bay development east of Telegraph Hill.

The 1963 Downtown Plan had two high-rises flanking the saved Ferry Building's tower.

Old Produce Market's tenants fought and were displaced by the Golden Gateway towers.

Instead of more Golden Gateway towers, activists fought for the low-rise Golden Gateway Commons.

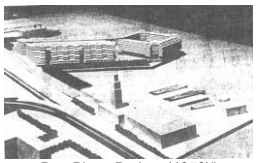
ENVIRONMENTAL CAPITAL: A long-term economic measure includes incorporating "natural capital"---the value of such things as esthetics, nature, and generic diversity---into economic decision-making. From a long-range perspective, waterfront beauty has incalculable economic value---for regional drawing power and people's happiness quotient.

Russian Hill Towers (1958): Mies van der Rohe proposal with block-long parking garage.

Port Authority Plan (1959: Office buildings, hotel, commercial, terminal….

International Market Place (1968): Multiblock complex at foot of Telegraph Hill.

Ferry Building Plans (1968): Northern Waterfront Plan.



Port Plaza Project (1970)" Ferry Building and Pier 1.

Villamarina Project (1974): The piers and area around Aquatic Park developed.

Pei-Cobb-Fried Proposal (1980)" Office and commercial at Ferry Building and Pier 1.

Koll's Sailing Center (1980)" Piers at Bay Bridge---Hotel, restaurant, retail, marina….

SWL 330 Condo Tower (2006) built though Pier 30-32 cruise terminal cancelled.

Arena/ Condo Project (2014): Entertainment venue and condo towers around Pier 30-32---moved.

THE DEVELOPER-POLITICAL COMPLEX of financial interests works to heighten development, to escalate land values and to transfer public assets to private interests. Freeways and subways are regional escalators of real estate values by promoting well-heeled commuters. The Developer-Political Complex is a network of financial self-interests --- developers, realtors, contractors, consultants, public relations firms, politicians, city staff, nonprofits, and groups who receive donations, fees, payments, and wages. Citizens have rightfully fought for their assets.

FOUNDSF: "The Freeway Revolt" **http://foundsf.org/index.php?title=The_Freeway_Revolt**

On November 2, 1956 the *San Francisco Chronicle* graciously published a map of the proposed and actual freeway routes through San Francisco even though its accompanying editorial was already chastising protestors: "The remarkable aspect of these protests and claims of injury is their tardiness. They concern projects that have for years been set forth in master plans, surveys, and expensive traffic studies. They have been ignored or overlooked by citizens and public official alike—until the time was at hand for concrete pouring and when revision had become either impossible or extremely costly. The evidence indicates that the citizenry never did know or had forgotten what freeways the planners had in mind for them."

WE ARE ON LIFE'S STAGE EVER SO BRIEFLY relative to the timeless beauty of the waterfront environment. It is the responsibility of each generation to protect natural assets for all.

Howard Wong, AIA

From: Kathryn Hyde
To: Press Office, Mayor (MYR); Severiano.Christian@sen.ca.gov; Raayan.Mohtashemi@sen.ca.gov
Cc: Carroll, John (BOS); Chan, Connie (BOS); MelgarStaff (BOS); Board of Supervisors (BOS); Hsieh, Frances (BOS); Mandelman, Rafael (BOS); Walton, Shamann (BOS); Andrews, Michelle (BOS); radhika.gawde@sen.ca.gov
Subject: Re: housing SF
Date: Monday, December 1, 2025 6:51:15 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors,

The City Economist's report shows clearly that Lurie's plan will not work and will trigger the State to hijack San Francisco's housing decisions. This is because zoning changes don't produce new affordable housing.

- We do not have the infrastructure, police force, roads, parking and water to support this plan.
- Structures should be limited to 5 stories to preserve lighting and wind

- Much of the new construction is poorly designed - i,e, Haight and Stanyan

- We are only 7 x 7 square miles. SF is not like cities that have space
- Concerns about earthquakes
- There is space to build on vacant lots, Walgreens sites, 7/11 on Clment/9th Ave., etc.
- No buildings close to the shoreline
- We still have 2 months to replace the Mayor's plan with one that will work. Here's a real strategy to solve the City's affordable housing crisis.

I favor producing housing out of existing vacancies and empty office space as much as possible, instead of building new units. New construction uses massive amounts of cement, wood, and diesel construction equipment, releasing more greenhouse gas emissions.

The Mayor's plan would build more excess housing for the wealthy, create more homelessness, and is an environmentally destructive giveaway to rapacious Wall Street and corporate real estate speculators.

Thank you!

Kathryn Hyde
130 Frederick St SF 94117

From:	Dwyer, Debra (CPC)
To:	BOS Legislation, (BOS)
Cc:	Shum, Ryan (CPC); Gibson, Lisa (CPC); Chen, Lisa (CPC); Switzky, Joshua (CPC); Tanner, Rachael (CPC); Lew, Lisa (BOS); Carroll, John (BOS)
Subject:	Letter submitted 12/1 by Lozeau Drury law firm re Family Zoning Plan
Date:	Monday, December 1, 2025 3:27:42 PM
Importance:	High

Hello,

In the Land Use committee hearing today, a speaker indicated that a letter was submitted around 12:45 pm today from the law firm Lozeau Drury regarding the environmental review for the Family Zoning Plan, files 250700 and 250701.

Please forward a copy of this letter to Planning as soon as possible - to Planning staff on this email. We need to review it before the full board hearing tomorrow, 12/2.

Thank you very much for your attention to this matter.

Debra Dwyer

Debra Dwyer (she/her/hers)
Principal Environmental Planner
Environmental Planning Division
San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7576 | www.sfplanning.org
San Francisco Property Information Map

From:	Richard Drury
To:	Board of Supervisors (BOS); MandelmanStaff (BOS); ChanStaff (BOS); SherrillStaff; SauterStaff; MelgarStaff (BOS); ChenStaff; MahmoodStaff; DorseyStaff (BOS); FielderStaff; Waltonstaff (BOS); Carroll, John (BOS); FamilyZoningCEQA@sfgov.org
Subject:	CEQA comments for Family Zoning Plan (Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985)
Date:	Monday, December 1, 2025 12:44:54 PM
Attachments:	2025.12.01.SF Rezone BOS ComLtr-PDF w exhibits.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Board of Supervisors and Land Use and Transportation Committee:
Attached please find the comments of Neighbors United SF concerning the Family Zoning Plan, (Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985).
Thank you for considering these comments. Please include these comments in the record for this matter.
Richard Drury

--
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richard@lozeaudrury.com

BY E-MAIL

December 1, 2025

Board President Rafael Mandelman and
Honorable Supervisors
San Francisco Board of Supervisors
Attn: Angela Calvillo, Clerk of the Board
Land Use and Transportation Committee c/o Clerk John Carroll
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Board.of.Supervisors@sfgov.org
mandelmanstaff@sfgov.org
ChanStaff@sfgov.org
SherrillStaff@sfgov.org
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DorseyStaff@sfgov.org
FielderStaff@sfgov.org
waltonstaff@sfgov.org
John.Carroll@sfgov.org
Lisa Chen, sf.housing.choice@sfgov.org
Ryan Shum, CPC, FamilyZoningCEQA@sfgov.org

RE: Comment on CEQA Addendum for San Francisco "Family Zoning Plan."
Board of Supervisors December 2, 2025.
Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985

President Mandelman and Honorable Supervisors:

I am writing on behalf of Neighborhoods United SF, a consortium of San Francisco neighborhood and community groups representing thousands of San Francisco residents, concerning the so-called San Francisco "Family Zoning Plan" ("Rezone"). We request that the Board defer any decision on the Rezone until the City Planning Department prepares a Supplemental Environmental Impact Report ("SEIR"). CEQA review would force the City to consider feasible mitigation measures to reduce the Rezone's impacts, and also to consider feasible alternatives, such as placing the proposed 4,000 additional units in specific locations (such as Park Merced, Stonestown, Treasure Island, Hunters Point, etc.), rather than upzoning entire swaths of the city in hopes that the 4,000 units will be built somewhere within the upzoned areas.

I. INTRODUCTION

The Rezone will forever change the face of the City. It will allow new development to accommodate 54,000 new housing units in so-called "well-resourced" areas of the City.[1] While the City prepared an environmental impact report ("EIR") for its Housing Element in 2022 (2022 EIR), the proposed Rezone is vastly different from the zoning studied in the 2022 Housing Element and its associated 2022 EIR. Nevertheless, the Planning Department proposes to rely on the 2022 EIR.

A rezoning of this magnitude requires thorough environmental review under the California Environmental Quality Act ("CEQA") so that the City's residents and decision-makers can be aware of its impacts, can consider all feasible mitigation measures and alternatives, and can have a robust and open discussion prior to making irreversible changes to San Francisco's landscape for all time. The California Court of Appeal recently held that a supplemental EIR ("SEIR") is required for a general plan amendment that allows taller buildings than allowed by a prior plan (as here), and that the SEIR must analyze all of the increased impacts caused by the taller buildings. (*Save Our Access v. City of San Diego*, 2025 WL 2945714, 115 Cal.App.5th 388 (Cal. Ct. App. Oct. 17, 2025) (*Save Our Access II*); *Save Our Access v. City of San Diego*, 92 Cal.App.5th 819 (2023) (*Save Our Access I*).) Under the *Save Our Access* line of cases, an SEIR is clearly required for the Rezone since it allows vastly taller building heights, and includes different geographic areas than the 2022 Plan.

The Rezone will have myriad significant new impacts that were not analyzed in the 2022 EIR or included in the Housing Element.

- HISTORIC RESOURCES: The Rezone, unlike the Housing Element, will allow new, high-rise development in the historic northeast neighborhoods of North Beach and the Northern Waterfront, including Fisherman's Wharf– something not allowed or analyzed the 2022 EIR or Housing Element.
- HEIGHT LIMITS INCREASED: The Rezone, unlike the Housing Element, includes amendments to base zoning and base height limits, and creating new zoning for many areas. The Rezone will allow the construction of buildings up to 350-feet taller than anything analyzed in the 2022 EIR, resulting in new wind, aesthetic, biological and shadow impacts not analyzed in the 2022 EIR.

[1] While the Rezone purports to address racial disparities in the City by targeting "well-resourced" areas, the Rezone seems to focus on largely Asian "well-resourced" areas, such as the Sunset District, Richmond District, and Northeast, while leaving largely untouched predominantly Caucasian "well-resourced" area such as Pacific Heights, Marina and Seacliff. As such, the Rezone may have discriminatory impacts, much like the development of the Western Addition, or the City's historic bans on wood-framed buildings that targeted Chinese-owned businesses. (See, *Yick Wo v. Hopkins*, 118 U.S. 356, 6 S. Ct. 1064, 1065, 30 L. Ed. 220 (1886).) The City should analyze the potentially racially discriminatory impacts of the Rezone.

- HOUSING SUSTAINABILITY DISTRICT: The Rezone, unlike the Housing Element, establishes a housing sustainability district.
- WIND: The Rezone will create significant new wind impacts from vastly taller buildings, while at the same time the Rezone ordinance proposes to weaken the City's wind ordinance to eliminate the requirement for mandatory wind mitigation, and to redefine significant wind impacts from 1-hour to 9-hours – all of which will conspire to create significant new wind impacts far greater than anything analyzed or contemplated in the 2022 EIR.
- DISPLACEMENT OF RENT-CONTROLLED HOUSING: The Rezone will result in the displacement of rent-controlled tenants and legacy businesses, by replacing rent-controlled and existing affordable units with luxury, high-rise condos and allowing development in the areas within the Priority Equity Geographies Special Use District – something avoided in the 2022 Housing Element.
- AIR POLLUTION: The Rezone will create significant airborne cancer risks in newly identified APEZ zones (air pollutant exposure zones), and will result in criteria air pollution far above CEQA significance threshold set by the Bay Area Air District .
- SHADOW: The Rezone will create significant new shadow impacts due to much taller buildings.
- CONTAMINATED SITES: The Rezone will allow development on contaminated sites not analyzed in the 2022 EIR.
- TRAFFIC: The Rezone will create new significant air quality impacts from increased vehicle miles travelled (VMT), and from construction emissions.
- SEWAGE TREATMENT PLANT: The Rezone will allow development on the site of the North Point Wet Weather Sewage Treatment Facility, which will require either a replacement facility or vast amounts of infrastructure to transport sewage to other plants.
- NORTH BEACH SUD: The Rezone will have cumulative impacts with the recent repeal of the North Beach Special Use District, which removes protections for almost all historic resources in the North Beach area.
- GREAT HIGHWAY CLOSURE CUMULATIVE IMPACTS: The City has failed to analyze new changed circumstances, particularly the closure of the Great Highway, which will exacerbate significant traffic and public transit impacts on the Rezone, which adds thousands of new residential units to the Sunset and Richmond neighborhoods.

It is legally improper for the City to bypass CEQA review for the Rezone. Addenda are only allowed where '(2) Only **minor technical changes** or additions are necessary to make the EIR under consideration adequate under CEQA." (CEQA Guidelines §15164, subd. (a); *Save Our Heritage Organization v. City of San Diego*, 28

Cal. App. 5th 656, 664–65 (2018) (emphasis added). The Proposed Rezone in this case allows **increased height of up to 350-feet above those analyzed in the 2022 EIR**. (Addendum No. 1 to 2022 Housing Element Environmental Impact Report, ("Addendum") at p. 11). The 2022 EIR analyzed building heights of up to 300 feet for proposed buildings, which the Rezone allows building heights of up to 500 to 650 feet – 350 feet taller than anything analyzed in the 2022 EIR. (Addendum 11). These are not "minor technical changes," but rather major substantive changes with significant environmental impacts.

For these reasons, we ask the City to prepare a Supplement EIR to analyze the Rezone, and to consider feasible mitigation measures and alternative to reduce its myriad impacts.

II. PROJECT DESCRIPTION

The Rezone proposes to add 54,000 new housing units to San Francisco, above levels that would occur without rezoning. The City contends that the Rezone is necessary to meet state-mandated Regional Housing Needs Assessment (RHNA) goals of 36,200 additional housing units. The 2022 Housing Element provided for 50,000 new units of housing, so the Rezone allows for significantly more housing – 4,000 additional units. The Rezone moves the proposed housing to different areas of the city where it will have far greater impacts to historic resources, air quality, transportation, displacement and other resources.

We are commenting on the version of the Rezone that has been provided to the public. However, we are aware that the Rezone is in a state of flux, as new amendments are being proposed on an almost daily basis. The Rezone is a moving target, which makes meaningful public comment all but impossible. "An accurate, stable and finite project description is the sine qua non of an informative and legally adequate EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192.) "[A] curtailed or distorted project description," on the other hand, "may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance." (*Id.* See also, CEQA section 15124.) The City has abjectly failed to provide the public with an accurate and stable project description that would allow meaningful comment. At the very least, the City should allow a 30-day public comment period between the first reading of the Rezone Ordinance at the Board of Supervisors, anticipated to occur on December 2, 2025 and the second reading. The Project description will not be stable until the December 2, 2025 vote. This will allow a 30-day period for the public to review and comment on the stable project description.

The Project description in the 2022 EIR simply does not accurately describe the Rezone project. As such, the City may not rely on the 2022 EIR, which describes a very different Project. Some courts have allowed agencies to rely on prior EIRs when the revised project has the same footprint or the same or reduced environmental impacts.

(*Sw. Reg'l Council of Carpenters v. City of Los Angeles* (2022) 76 Cal. App. 5th 1154). However, when, as here, the project's footprint is expanded, the project's height is increased, and/or the project's impacts are increased, a supplemental EIR is required. (*Save Our Access I and II*).

The City largely ignores or mischaracterizes the Rezone's environmental impacts. For example, the Addendum does not even mention the fact that the Rezone (unlike the 2022 Housing Element) will allow redevelopment in the northeast districts of Telegraph Hill, North Beach and the Northern Waterfront, including Fisherman's Wharf. The City also ignores the fact that it has already approved 71,772 new units of housing that have yet to be built. The City' RHNA goal is 82,069. Therefore, the City only needs another 10,297 units to meet its RHNA goal – not 36,200, or 54,000.[2] Nor does the City discuss the fact that the Rezone is likely to displace low-income residents from rent-controlled units, while constructing new market-rate units without rent-control. The Rezone does not require any affordable housing and allows rent-controlled units to be replaced with luxury housing. The net result is likely to be less affordable housing – not more. The City's own calculations show that the Rezone will abjectly fail to meet RHNA's affordable housing goals.

The City fails to accurately describe the Rezone project. The City calculates that the "realistic" projected build-out as a result of the Rezone will be 54,000 additional housing units – 4,000 more than analyzed in the 2022 EIR. However, the Rezone actually creates a capacity for an additional 800,000 housing units. Full build-out would more than double the population of the City. Even the City's own calculations estimate that the Rezone could result in a range of additional housing ranging from 64,000 units (soft sites method); 39,000 units (citywide capacity method); to 19,000 units (financial feasibility method). (SF Planning Dept., Family Zoning Plan Rezoning Capacity Calculations Fact Sheet). Since the City's own staff admits that these are all realistic scenarios, a CEQA document should be prepared to compare the environmental impacts of these feasible outcomes, as well as the full build-out scenario.

The Rezone is vastly different from the Housing Element analyzed in the 2022 EIR. Supplemental CEQA review is required to analyze the impacts created by these vast changes to the Housing Element. These major modifications are discussed in the attached letter from Certified Urban Planner, Deborah Holley. (Exhibit A). Ms. Holley provides a map showing that the Rezone adds massive amounts of new development to District 3 (North Beach, Fisherman's Warf), and District 8 (Mission/Noe Valley), none of which was even mentioned in the 2022 EIR.

- The 2025 Rezone adds 6,938 parcels and 12,150 units, that were not in the 2022 Housing Element.

[2] Housing and Community Development barely accounted for the capacity created by the 4-plex and 6-plex legislation passed in 2023. Roughly 120,000 parcels are eligible, and even a fraction of those converting to 4–6 units would generate hundreds of thousands of potential homes.

- The Rezone increases height on 7,580 parcels and 10,009 units, above heights analyzed in the 2022 EIR.
- The Rezone increases density on 16,135 parcels, with 16,135 units currently on those parcels.
- The Rezone adds 30,653 parcels with 38,692 units that were not analyzed in the 2022 EIR – mostly in District 3 and District 8.
- The Rezone almost doubles the square footage of developable land, increasing the amount by 254,211,574 square feet.

The Rezone opens up thousands of rent-controlled units for high density, market rate development, virtually ensuring that thousands of low-income residents will be displaced to make way for luxury housing. The Rezone includes 3,481 two-unit rent-controlled parcels with 32,237 units, increases height on 4,345 rent-controlled parcels with 26,784 units, an increases density on 1,341 rent-controlled parcels with 20,691 units. While the Board of Supervisors is considering amendments to protect rent-controlled units with 3 or more units, this leaves about 20,564 two-unit rent-controlled units (10,282 parcels) with absolutely no protection from displacement and redevelopment.

None of these impacts were proposed, discussed or analyzed in the 2022 EIR, and must be analyzed and mitigated in a supplemental EIR.

III. LEGAL STANDARD.

A. CEQA Addendum (Pub. Res. Code section 21166).

The City Planning Department proposes to approve the Rezone based on an Addendum to the 2022 Housing Element EIR. This is entirely inappropriate since, as discussed above, the Rezone adds 30,653 parcels that were not analyzed in the 2022 EIR. The proposed Rezone is vastly different from the project analyzed in the 2022 EIR, and will have significant new environmental impacts that must be analyzed in a Supplemental EIR. (SEIR).

The court of appeal has stated, “The addendum is the other side of the coin from the supplement to an EIR. This section provides an interpretation with a label and an explanation of the kind of document that does not need additional public review.” “It must be remembered that an addendum is prepared where ‘(2) **Only minor technical changes or additions are necessary to make the EIR under consideration adequate under CEQA; and (3) The changes to the EIR made by the addendum do not raise important new issues about the significant effects on the environment.**’ (CEQA Guidelines §15164 (a); *Save Our Heritage Organization v. City of San Diego*, 28 Cal. App. 5th 656, 664–65 (2018) (emphasis added).) Even a 15-foot increase in height for a residential building (increasing height from 75 feet to 90 feet) requires a supplemental EIR, not an addendum. “Accordingly, the appropriate protocol is to have the county draft and recirculate a focused supplemental EIR, limited solely to analysis of height and profile-related impacts of the medical clinic, as built and where built to a height of ninety feet.” *Ventura Foothills Neighbors v. Cty. of Ventura*, 232 Cal. App. 4th 429, 434, (2014).

Section 15164(a) of the CEQA Guidelines states that "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Pursuant to Section 15162(a) of the State CEQA Guidelines, a subsequent EIR or Negative Declaration is only required when:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
(C) Mitigation measures or alternatives previously found not to be feasible would, in fact, be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The "fair argument" standard applies to analysis under Section 21166 when the proposed project is outside the scope of the prior EIR. As the Court of Appeal recently held:

> We similarly apply the **fair argument** test to review an agency's determination whether to prepare a **new** or **supplemental EIR** in a later **new project** following certification of a **program EIR**. [Citation.] The Legislature's use of similar language in sections 21151 and 21094 indicate "it intended to establish a similar **low threshold** for an agency's determination **whether to prepare a new EIR** on a later new project that follows certification of a program or plan EIR. In other words, **if** there is **substantial evidence** in the record that the **later project may arguably have** a **significant adverse effect** on the environment

> which was **not examined in the prior program EIR, doubts must be resolved in favor of environmental review** and the agency **must prepare** a **new tiered EIR, notwithstanding** the existence of **contrary evidence**." [Citation.]
>
> (*Save Our Access I*, 92 Cal.App.5th at 860 [citing *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1320–1321] [emph. added].)

As the court held in *Save Our Access I*, a project that allows development of a greater height than analyzed in a prior programmatic EIR, is outside the scope of the prior EIR. (*Save Our Access I*, 92 Cal.App.5th at 845.) Therefore, the "fair argument" standard applies to subsequent projects that exceed the height limits in the program EIR. (*Id*. at 860). A project that includes geographic areas outside the scope of the prior program EIR is also subject to the fair argument standard. (*Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1320–1321). A subsequent project is not within the scope of a previous Program EIR if it is inconsistent with the plan addressed in the Program EIR. (14 CCR § 15168(c)(2); *see* PRC § 21094(b).) "**If the subsequent project is not consistent with the program or plan, it is treated as a new project and must be fully analyzed in a project—or another tiered EIR if it may have a significant effect on the environment.**" (*Friends of College of San Mateo Gardens v. San Mateo County Community College Dist*. (2016) 1 Cal.5th 937, 960 [emph. added]; *Save Our Access I,* 92 Cal.App.5th at 845.)

Since the Rezone allows vast swaths of development outside of geographic areas analyzed in the 2022 EIR, allows building heights of up to 350 taller than analyzed in the 2022 EIR, and allows development of historic resources and contaminated sites not analyzed in the 2022 EIR, the "fair argument" standard applies to the City's use of an Addendum. Under the fair argument standard, an EIR is required if there is a "fair argument" based on substantial evidence that the project may have any significant adverse environmental impacts. Pub. Res. Code § 21080(d).

B. SB 131.

The Addendum briefly argues that the recently passed SB 131 applies to some, but not all, of the Rezone. (Addendum 8). SB 131 exempts from CEQA review "a rezoning that implements the schedule of actions contained in an approved housing element pursuant to subdivision (c) of section 65583 of the Government Code." The City argues that this exemption applies to all but 3.4 percent of the parcels in the Rezone, which are excluded from SB 131 as "natural and protected lands." (Addendum 8).

The City misinterprets SB 131. First, the Rezone does not implement the approved 2022 Housing Element. In fact, the Rezone is flatly inconsistent with the 2022 Housing Element. Most obviously, the 2022 Housing Element included almost no new development in the historic Northeast sector of the city (800 units), while the Rezone allows 5,900 units in that area. (Addendum 19). The 2022 Housing Element provided for negative 1,800 units in Downtown, while the Rezone placed 500 units in the Downtown area. (Id.). The Rezone placed 2,800 additional units in the Western Addition. Also, the

Rezone allows construction of buildings up to 350 taller than allowed by the Housing Element. As discussed above, the Rezone adds 30,653 parcels that were not analyzed in the 2022 EIR. Since the Rezone is inconsistent with the 2022 Housing Element, SB 131 does not apply at all.

Second, SB 131 provides that it does not apply to "natural and protected lands," and the Rezone admittedly includes numerous parcels that meet this definition. (Pub. Res. Code § 21080.085).

> (a) This division does not apply to a rezoning that implements the schedule of actions contained in an approved housing element pursuant to subdivision (c) of Section 65583 of the Government Code.
> (b) (1) Subdivision (a) does not apply to either of the following:
> (B) A rezoning that would allow for construction to occur within the boundaries of any natural and protected lands as defined pursuant to Section 21067.5.
> (2) (A) (i) Subdivision (a) applies to a rezoning that contains within its boundaries any natural and protected lands as defined pursuant to Section 21067.5 if those natural and protected lands are excluded from the rezoning.
> (ii) The definition of "natural and protected lands" described in clause (i) does not include the lands described in subdivision (p) of Section 21067.5.
> (B) The rezoning of any parcel or portions of a parcel that is excluded from a rezoning under this paragraph shall be a separate project that is subject to this division.
>
> Public Resources Code §21067.5 defines "natural and protected land" as follows:
>
> "Natural and protected lands" means sites located within any of the following locations:
> (a) The state park system, as described in Article 1 (commencing with Section 5001) of Chapter 1 of Division 5.
> …
> (i) A hazardous waste site that is listed pursuant to Section 65962.5 of the Government Code or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code, unless either of the following apply:
> (1) The site is an underground storage tank site that received a uniform closure letter issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code based on closure criteria established by the State Water Resources Control Board for the use proposed by the project. This paragraph does not alter or change the conditions to remove a site from the list of hazardous waste sites listed pursuant to Section 65962.5 of the Government Code.
> (2) The State Department of Public Health, State Water Resources Control Board, Department of Toxic Substances Control, or a local agency making a determination pursuant to subdivision (c) of Section 25296.10 of the Health and Safety Code has otherwise determined that the site is suitable for the use proposed by the project.

> (j) Within a regulatory floodway as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency, unless the development has received a no-rise certification in accordance with Section 60.3(d)(3) of Title 44 of the Code of Federal Regulations.
> …
> (m) An environmentally sensitive area within the coastal zone, as defined in Section 30107.5…

The Addendum admits that at least 3.4 percent of the Rezone area are "natural and protected lands," within the meaning of SB 131. The Upzoning Plan includes several Cortese List contaminated sites. Several of these sites are "active," meaning that they have not be remediated. We have retained a hazardous materials expert to identify all of the Cortese List sites covered by the Upzoning. But we have already identified at least nine active Cortese List sites in our informal review, including 1100 JUNIPERO SERRA BLVD; and 300 W PORTAL AVE. The Rezone also includes parcels in listed flood zones. The Rezone also includes environmentally sensitive areas in the Coastal zone. These areas are expressly excluded from SB 131 and render the entire Rezone project ineligible for an SB 131 exemption.[3]

IV. CEQA ANALYSIS.

A. HISTORIC RESOURCES.

The Rezone will have significant historic resources impacts that were not analyzed in the 2022 EIR. The 2022 EIR found significant and unmitigated impacts to historic resources, (Addendum 60), but the Rezone's impacts are far greater and also significant and unmitigated. (Addendum 61). Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).)

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[3] The Addendum suggests that it can review the Rezone using a hybrid approach – reviewing the natural and protected lands under CEQA section 21166, and the remainder of the Project under SB 131. However, CEQA prohibits such a schizophrenic analysis. Under CEQA, the agency must review the "whole of the action" in a single document. A "project" is "the whole of an action" directly undertaken, supported, or authorized by a public agency "which may cause either a direct physical change in the environment, or a reasonably foreseeable ***indirect*** physical change in the environment." (PRC § 21065; CEQA Guidelines, 14 CCR § 15378(a).) A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole. "The requirements of CEQA, 'cannot be avoided by chopping up proposed projects into bite-size pieces which, individually considered, might be found to have no significant effect on the environment or to be only ministerial.' [Citation.]" (*Topanga Beach Renters Assn.* v. *Department of General Services* (1976) 58 Cal.App.3d 188, 195-196 [129 Cal.Rptr. 739].)

We submit herewith the comments of Architectural Historian Bridget Maley, former President of the San Francisco Landmarks Advisory Board. (Exhibit B). She states:

> The Rezone would result in a myriad of significant new impacts that were not analyzed in the 2022 EIR or included in the Housing Element, not the least of which are impacts to historic resources. The Rezone will have significant historic resources impacts that were not analyzed in the 2022 EIR. The 2022 EIR found significant and unmitigated impacts to historic resources, but the Rezone's impacts are far greater, with significant and unmitigated impacts. Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).)
>
> The Rezone allows high-rise development on, near, or within areas that contain historic resources. Many of these areas were not included for development in the 2022 Housing Element, and the impacts of this potential development on historic resources was not analyzed in the 2022 EIR.
>
> Further, the Rezone includes the following language related to Bonuses for "Historic Preservation." However, these bonuses, as shown below, encourage height increases, facadism, and other over-scaled additions that would result in diminished historic fabric and result in unintended impacts to historic resources. Additionally, this proposed legislation added at the last minute in the September 11, 2025 version of the legislation, and has not been evaluated in the Addendum or in a SEIR.
>
> (Maley at 2-3).

Maley goes on to discuss provisions of the Rezone that encourage development of historic buildings. She states, "This late addition to the legislation has the great potential to cause impacts to historic resources, instead of preserving them, as it would allow large sections of historic buildings to be demolished and over scaled additions and height increases to be implemented as bonuses. For the reasons listed above, it is my professional opinion that the Rezone, if approved, would have potentially significant environmental impacts that must be analyzed and mitigated under the California Environmental Quality Act ("CEQA") through a full recirculated SEIR." (Id. at 4).

The 2022 EIR assumed that historic buildings (Category A resources) would not be redeveloped for housing. (2022 EIR, App. C, pp. 10, 17). The 2022 EIR stated, "The department's housing growth projection factored in the locations of known historic districts in San Francisco and assumed that future development would primarily occur outside those districts." (2022 EIR p. 4.2-82). The HE EIR conceded that its "analysis cannot anticipate the exact manner in which future construction may be designed or whether such projects will propose altering or demolishing historic resources." (2022 EIR p. 4.2-85.) The 2022 EIR stated:

> The representative pattern of growth depicted in the department's projection of future housing units under the Housing Element 2022 Update takes into account

> the presence of individual built-environment historic resources and historic districts identified as of 2021 (including resources designated or found eligible for listing in local, state, and federal historic resource registers). Specifically, the projection assumes future housing construction would be less likely to occur on parcels that currently contain Category A resources (i.e., properties that are already known to qualify as historic resources)... This assumption reflects that Category A resource status would act as a development constraint for future housing development construction. Additionally, the planning department did not increase height limits in historic districts identified in [the Planning Code]. (2022 EIR, App. C, pp. 10, 17.)

However, the Rezone now identifies numerous historic resources for upzoning for residential development, contrary to the analysis in the 2022 EIR.

The 2022 EIR concluded that any impacts to historic resources would be significant even after mitigation. By increasing impacts to historic resource, the 2025 Rezone will have "significant effects previously examined will be substantially more severe than shown in the previous EIR," and a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).) The 2022 EIR concluded that even with the implementation of mitigation, impacts to "project-level and cumulative: built-environment historic resources" would be significant and unmitigated. (2022 EIR p. S-4.) "Because demolition of built-environment historic resources or alteration in an adverse manner could still occur, the impact would be significant and unavoidable with mitigation." (2022 EIR, p. 4.2-100.)

In *Communities for a Better Environ. v. Calif. Resources Agency* (2002) 103 Cal.App.4th 98 at 122-125 (*CBE v. CRA*), the court held that when a "first tier" EIR admits a significant, unavoidable environmental impact, a lead agency must prepare second tier EIRs for later projects to ensure that those unmitigated impacts are "mitigated or avoided." (Id.) The court reasoned that the unmitigated impacts were not "adequately addressed" in the first tier EIR since they were not "mitigated or avoided." (Id.) Thus, significant effects disclosed in first tier EIRs will trigger second tier EIRs unless such effects have been "adequately addressed," in a way that ensures the effects will be "mitigated or avoided." (Id.) Such a second tier EIR is required even if the impact still cannot be fully mitigated and a statement of overriding considerations will be required. The court explained, "The requirement of a statement of overriding considerations is central to CEQA's role as a public accountability statute; it requires public officials, in approving environmentally detrimental projects, to justify their decisions based on counterbalancing social, economic or other benefits, and to point to substantial evidence in support." (Id. at 124-125.) Since the 2022 EIR determined that impacts to historic resources would be significant and unmitigated, supplemental CEQA review is required for the 2025 Rezone, which increases impacts to historic resources.

The Rezone allows high-rise development in the Northeast Sector of the City, including in the historic district of North Beach. These areas were not included for development in the 2022 Housing Element, and the impacts of this development on historic resources was not analyzed in the 2022 EIR. By moving over 5000 units of new housing to this area, the Rezone exacerbates the impact on historic resources. Since this

is “one or more significant effects not discussed in the previous EIR,” (CEQA Guidelines 15162(a)(3)(A)), a supplemental EIR is required to analyze and mitigate this impact. Since this impact is beyond the scope of the 2022 EIR, it is subject to the fair argument standard.

The Housing Element EIR Addendum fails to analyze impacts of additional height and density increases, as well as changes in zoning use districts, on designated historic resources or historic districts or areas with known concentrations of “A” rated historic resources, but not yet designated as historic districts. Bridget Maley’s letter includes a listing of historic resources adversely affected by the Rezone. Impacts to these historic resources were not analyzed in the 2022 EIR and must be analyzed in a Supplemental EIR. That list included herein by reference. It includes, but is not limited to:

- Fully documented North Beach National Register Historic District submitted to the State Historic Preservation Office and awaiting hearing by the State Historical Resource Commission was not included in the 2022 Housing Element or analyzed in the 2022 EIR .The Rezone could have significant impacts to this identified historic district, including heights rezoned from 40 feet to 50 feet in block Block 0076.
- Designated Northeast Waterfront Article 10 Historic District.
- Eligible Washington Square Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Eligible Upper Grant Avenue Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR .
- Designated Otis Elevator Company National Register No. 99001265 (1 Beach Street; Parcel 0018/001).
- Designated Grabhorn Press Building National Register No. 97000349 (1335 Sutter Street; Parcel 0690/012A).
- Designated Thomas Payne House National Register No. 80000847 (1409 Sutter Street; Parcel 0689/025). This parcel is rezoned from its existing height limit of 130 feet to 500 feet.
- Designated Washington Square Article 10 Landmark No. 226 (1651 Stockton Street and Filbert Street; 0102/022001) . The parcels on the northern edge of Washington Square are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the 2022 EIR . This could result in significant impacts to this park.
- Temple Sherith Israel National Register #10000114 (2266 California St., Parcel 0637/011).

- Designated Cable Car National Register Historic District No. 66000233. The Cable Car lines located within areas being upzoned and/or density decontrolled by the Upzone Plan could be significantly impacted.
- Designated Grace Cathedral Article 10 Landmark No. 170 (1100 California Street; Parcel 0246/001). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR.
- Designated Old Flood Mansion, Pacific Union Club, both Article 10 Landmark No. 64 and National Register No. 66000230 (1000 California Street; Parcel 0245/001).
- Historic Category "A" rated buildings across the city would be impacted by the Rezone as it affords no protection for these previously identified but not designated historic resources. The City of San Francisco Planning Department has previously required full Historic Resource Evaluations for projects involving Category "A" rated buildings. This policy change was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Casebolt House Article 10 Landmark No 51 (2727 Pierce Street, Parcel 0560/005). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Spreckels Residence Article 10 Landmark No. 197 (2080 Washington Street, Parcel 0601/005. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.
- Haas-Lilienthal House Article 10 Landmark No. 69 and National Register No 730000438 (2007 Franklin St. 0600/002). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.
- Sacred Heart Parish Complex Article 10 Landmark No.316 and National Register 10000112 (660 Oak Street, Parcel 0828/012; 735 Fell Street, Parcel 0828/022A; 554 Filmore Street, Parcel 0828/22; and 546-548 Filmore Street, Parcel 0828/21). The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the EIR.
- Many other historic buildings listed in letter of Bridget Maley.

B. HEIGHT AND RELATED IMPACTS.

The Rezone will allow construction of buildings up to 350-feet taller than analyzed in the 2022 EIR. The 2022 EIR analyzed building height ranging from 55 feet to 300 feet high. (Addendum 11). The Rezone allows building heights up to 500 feet high, and up to 650 feet high in two areas. (Addendum 11). These taller buildings are beyond the scope of the 2022 EIR, triggering the fair argument standard of review, as in the *Save Our Access* cases, discussed above. As the court of appeal held in *Save Our Access II*, supplemental CEQA review is required to analyze all of the impacts stemming from the greater building heights allowed by the Rezone.

1. Biological Impacts.

The Addendum admits that taller buildings may have biological impacts by obstructing flight paths of birds and impacting movement of special status species. (Addendum 48-49). The 2022 EIR found biological impacts to be less than significant. Since the Rezone will have significant biological impacts, the project will have "one or more significant effects not discussed in the previous EIR," (CEQA Guidelines 15162(a)(3)(A),) and a supplemental EIR is required.

The 2022 EIR did not analyze biological impacts since it found the impact to be less than significant. (2022 EIR, p. 4.1-1.) Since the EIR found biological impacts to be less than significant, it imposed no mitigation measures. (2022 EIR, p. 4.1-149.) Since biological impacts were not examined as significant effects in the 2022 EIR, CEQA review is now mandated because the project will have one or more significant effects not discussed in the previous EIR or negative declaration. (CEQA Guildelines 15163(a)(3)(A)).

Expert wildlife biologist Dr. Smallwood, Ph.D., concludes that the 2025 Rezone will have significant biological impacts not analyzed in the 2022 EIR. (Exhibit C). Dr. Smallwood concludes that by adding 4,000 additional residential units, changing the spatial distribution of the buildings, and increasing building heights, that the Rezone will have greater impacts on birds than the 2022 Plan. In particular, he concludes that the Rezone will have greater impacts on bird-window collisions, and that these impacts will not be adequately mitigated by the City's bird-safe window requirements. (Smallwood at 2-3). Dr. Smallwood states, "the additional 4,000 residential units could result in very large numbers of collision fatalities despite implementation of the City's Standards for Bird-Safe Buildings." (Id. at 3).

Dr. Smallwood notes that San Francisco includes areas in the Pacific Flyway and areas that are rich in biological diversity. He states, "San Francisco is situated within the Pacific Flyway, which is one of the most intensely used bird migration pathways in the world." (Id. at 13). He states that "there are 147 special-status species of wildlife documented near enough to the project site to warrant a closer look at their occurrence likelihoods for the purpose of predicting potential project impacts." (Id.at 3). Dr. Smallwood concludes that the 2025 Rezone will result in 7,095 additional bird fatalities each year compared to the 2022 Plan, to a 95% confidence level. (Id. at 12). Dr. Smallwood concludes:

> Nearly all predicted deaths would be of birds protected under the Migratory Bird Treaty Act and under the California Migratory Bird Protection Act, thus causing significant impacts. Given the predicted level of bird-window collision mortality, it is my opinion that the proposed project would result in potentially significant adverse biological impacts, including the unmitigated take of aerial habitats of birds, bats and other volant wildlife. Not only would the project take habitat of rare and sensitive species of birds, but it would transform the building's airspace into a lethal collision trap to birds. (Id. at 13).

Dr. Smallwood concludes that CEQA review is required to analyze patterns of bird movement through the City and to propose feasible mitigation measures and alternatives to avoid impacts. (Id. at 17).

2. Wind.

The 2022 EIR concluded that the Housing Element would have significant and unmitigated wind impacts. (Addendum 99). The 2022 EIR did not analyze the impacts of the taller buildings allowed in the 2025 Rezone. The 2022 EIR assumed that projects would "stay within existing height limits." (2022 EIR, App. C, p. 17, 3.)

The Addendum admits that the Rezone will have significant unmitigated wind impacts. (Addendum 108). It concluded that buildings over 85-feet tall would have significant wind impacts. (Addendum 104). The Rezone will add taller buildings over 85-feet to more areas of the City, resulting in much greater wind impacts. Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," (CEQA Guidelines 15162(a)(3)(B)), a supplemental EIR is required.

The Rezone allows buildings of up to 650-feet tall in certain areas. It allows increased heights along Market Street between Castro and Van Ness. Up to 160 feet. (Addendum 100). The Rezone allows 85-feet heights along Geary, and up to 300 feet at Geary and Masonic. (Addendum 101). The height difference between the rezoned blocks and the surrounding blocks with low heights would result in wind speeds that would likely exceed the hazard criteria. (Addendum 102).

The 2022 EIR stated, "Wind impacts are generally caused by large building masses that are substantially taller than their surroundings." (2022 EIR, p. 4.7-2.) The 2022 EIR states, "All projects greater than 85 feet In height would require a screening-level assessment conducted by a qualified wind expert in consultation with the department to determine their potential to result in a new wind hazard exceedance or aggravate an existing pedestrian-level wind hazard exceedance defined as the one-hour wind hazard criterion with a 26 mph equivalent wind speed." (2022 EIR, p. 4.7-11.) Since the Rezone will allow much taller buildings, well over 85-feet tall and up to 650-feet tall, it will have significant wind impacts under the standards set forth in the 2022 EIR, and an SEIR is required to analyze and mitigate these impacts.

The Rezone includes a change to the City's wind ordinance that requires CEQA review for buildings over 85 feet. The Rezone proposes to change the hazard criterion such that proposed development must not create any net new exceedance of 26 MPH wind speed for nine hours or more in a year, rather than one hour. (Addendum 104). In other words, after the Rezone, a building may cause hazardous wind conditions for a full workday, which is not currently allowed. The Rezone also eliminates an existing code requirement for "landscaping and/or wind baffling measure shall be installed on the windward side .. of the areas of concern.:" (Addendum 109).

By allowing vastly greater building heights, and eliminating previously existing mitigation standards and mitigation measures, the Rezone will have much greater wind

impacts that were never analyzed in the 2022 EIR. A supplemental EIR is required to analyze these wind impacts because "significant effects previously examined will be substantially more severe than shown in the previous EIR," (CEQA Guidelines section 15162(a)(3)(B)), and "Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative." (CEQA Guidelines section 15162(a)(3)(D)).

3. Shadow.

The vastly taller buildings allowed by the Rezone will have significant shadow impacts exceeding the City's CEQA significance thresholds. The 2022 Housing Element had significant unmitigated shadow impacts on Duboce Park, Larsen Playgrond, and Laurel Hill Playground.(Addendum 110-111). The Rezone creates new significant unmitigated shadow impacts on public parks including but not limited to, Noe Valley Town Square and Helen Wills Park, (Addendum 111, 113, 119) and on other parks and open spaces in areas added by the Rezone to the Northeast District including Washington Square, Joe DiMaggio Playground, and Levi Plazza Park. A supplemental EIR is required to analyze these impacts because "significant effects previously examined will be substantially more severe than shown in the previous EIR," (CEQA Guidelines section 15162(a)(3)(B))

We submit herewith the analysis of shadow expert Adam Noble of the consulting firm FastCast. (Exhibit D). Mr. Noble concludes that the Rezone will result in net new shadow impacts on Joe DiMaggio Playground not analyzed in the 2022 EIR. This is a zero-tolerance park, not allowed to have any additional shadow under CEQA and Measure M (Planning Code Section 295). Mr. Noble's analysis shows that on certain periods of the year and times of day, the Rezone will more than double the amount of shadow on Joe DiMaggio Park.

The City contends that a project that adds new shadow to sidewalks or a publicly accessible open space (whether subject to Section 295 or not) does not necessarily result in a significant impact under CEQA. The shadow impact analysis described in the city's Initial Study CEQA Checklist examines whether a project would "***create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces***".

Under planning code section 295 and the joint Planning Commission/Recreation and Park Commission criterion, the impact of any amount of shadow cast by a project on public parks, open spaces, or recreational facilities under the jurisdiction of SFRPD would be considered "significant" if it would affect a facility with an established quantitative limit.

Joe DiMaggio Playground has an established quantitative limit of zero, and as detailed below, the proposed rezoning would have a net increase in shadow cast on the playground, and would therefore, result in a significant impact.

In assessing impacts per the City's CEQA significance criterion, the environmental review requires evaluation of quantitative and qualitative factors but requires ***use and enjoyment of the park or public space to be substantially and adversely affected for the impact to be "significant."*** Therefore, the City contends that in certain situations, new shadow effects on an open space might not be a significant environmental impact under CEQA but could be found to be significant under planning code section 295. (Housing Element EIR p 4.8-17)[4]

Because Joe DiMaggio playground is heavily used throughout all periods of the day throughout the year by residents from the neighborhood and nearby neighborhoods, as well as schools for P.E. classes, the additional shadow would adversely and substantially impact the use and enjoyment of the park.

As detailed in Mr. Noble's analysis, this would be particularly true for fall periods when shadow impacts would be the most significant and lower temperatures create a greater need for sunlight to be able to enjoy the park.

C. DISPLACEMENT.

The Addendum admits that the Rezone will result in displacement of low-income residents, small businesses, and legacy businesses. (Addendum 37-38). The Addendum states, "new market-rate housing development may contribute to indirect displacement of lower-income communities in San Francisco." (Addendum 37). It continues, "there could be a connection between market rate housing development and displacement." (Addendum 38). By allowing more market rate housing in the Rezone than in the 2022

[4] Commenter disputes the City's shadow impacts methodology because it conflicts with well-established court of appeal precedent. Where a local or regional policy of general applicability, such as an ordinance, is adopted in order to avoid or mitigate environmental effects, a conflict with that policy in itself indicates a potentially significant impact on the environment. (*Pocket Protectors v. Sacramento* (2005) 124 Cal.App.4th 903.) Indeed, any inconsistencies between a proposed project and applicable plans must be discussed in an EIR. (14 CCR § 15125(d); *City of Long Beach v. Los Angeles Unif. School Dist.* (2009) 176 Cal. App. 4th 889, 918*; Friends of the Eel River v. Sonoma County Water* Agency (2003) 108 Cal. App. 4th 859, 874 (EIR inadequate when Lead Agency failed to identify relationship of project to relevant local plans).) A Project's inconsistencies with local plans and policies constitute significant impacts under CEQA. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4; *Georgetown Preservation Society v. County of El Dorado* (2018) 30 Cal.App.5th 358.) Since the Rezone Project has significant impacts under Prop M (Section 295), it also has significant impacts under CEQA. However, because the Rezone Project has significant shadow impacts even under the City's improperly narrow interpretation of the law, the issue is moot.

Housing Element, this displacement impact will be exacerbated. According to an economic analysis prepared by the San Francisco Office of the Controller, as a result of Rezone 500 to 1,000 additional units would be demolished over 20 years. Many of these units will be rent-controlled (pre-1979) units since these properties will have the lowest land value. This is very different than the 2022 Housing Element, which avoided Priority Equity Geographies (PEGs), where lower income residents live. By contrast, the Rezone includes large PEG areas, where displacement is inevitable.

While the Supervisors are considering measures to provide some protection for rent-controlled properties with 3 or more units, this does nothing to protect the thousands of duplex rent-controlled properties found throughout the Richmond and Sunset Districts and elsewhere in the City. Ms. Holley calculates that the Rezone will affect 3,838 2-unit rent-controlled parcels with 7,676 rent-controlled units. Holley states (Exhibit A):

> under the rezoning, there are a significant number of two-unit rent-controlled buildings on parcels with an existing height limit of 40 feet that would be rezoned to allow heights of 50', 65' and 85', and would no longer require setbacks, creating greater incentives and likelihood that they would be redeveloped under the proposed rezoning.

Also, the Rezone allows increased development in North Beach and the Western Addition (Addendum 19), which include high levels of rent-controlled units and Priority Equity Geographies, which were excluded from development in the 2022 Housing Element. San Francisco Planning Code states that "The Priority Equity Geographies SUD is comprised of areas or neighborhoods with a higher density of vulnerable populations" and that the 2022 Update of the Housing Element of the General Plan ((2022 Housing Element) identifies them as "areas…where zoning changes must be tailored to serve the specific needs of the communities that live there; and where programs that stabilize communities and meet community needs need to be prioritized."

The Rezone shifts 5,100 units of housing to the Northeast District, (Addendum 19) which is home to the highest percentage of rent-controlled units in the City. The Rezone adds 939 parcels in PEG areas, with 2,321 units, including 70 two-unit rent-controlled buildings with 140 units.

Urban Planner Deborah Holley states, "The inclusion of parcels in the Priority Equity Geographies SUD and the associated displacement impacts need to be identified and assessed in a supplemental EIR."

Allowing this development and displacement in the Priority Equity Geographies SUD is flatly inconsistent with the 2022 EIR and the 2022 Plan since the stated purpose of the 2022 Plan was to focus development on "well-resourced areas" and away from Priority Equity Geographies. The 2025 Rezone does the exact opposite of the stated goal of the 2022 Plan, which is an obvious inconsistency requiring supplemental CEQA review.

Ms. Holley also points out that the Rezone for the first time adds Laguna Honda Hospital. Redevelopment of this parcel would result in massive displacement. Ms. Holley

states, “The 62-acre Laguna Honda hospital and rehabilitation center located 375 Laguna Honda Boulevard was added to the rezoning plan, and if redeveloped would result in significant displacement impacts for the long-term nursing home residents. Laguna Honda has 769 beds and offers short-term rehab and long-term nursing care…The FEIR did not address the impacts of redevelopment of Laguna Honda with housing because this site was not designated for rezoning. The rezoning program changes the allowable height limit on this site from 40’ which covers the majority of the 62 acres under existing height limits, to 85’ for the entire site, and increases the likelihood that it would be redeveloped with housing.”

Displacement is an environmental issue under CEQA. (*Save Berkeley Neighborhoods v. Regents* (2020) 51 Cal.App.5th 226, 233 (displacement of tenants is a CEQA impact)). CEQA requires the lead agency to determine whether the “environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly,” (PRC § 21083(b)(3), (d)). CEQA Guidelines Appendix G, Section XII provides that a project will have significant impacts where it will:

- Induce substantial population growth or concentration of population in an area, either directly (for example, by proposing new housing or businesses), or indirectly (for example, through extension of roads or other infrastructure);
- Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere; or
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. See CEQA Guidelines Appendix G, Section XII.

The Addendum suggests vague mitigation measures such as “advancing equitable housing access, promoting racial and social equity, and eliminating displacement with strategies such as tenant protections, preservation of affordability, production of affordable housing, and advancing equitable access to housing resources and affordable units.” However, these are vague and unenforceable measures. The Addendum fails to propose any binding and enforceable mitigation measures, such as requiring the mandatory construction of affordable housing, requiring payment for the construction of affordable housing, or requiring public lands to be used for 100% affordable housing. In fact, the city is reversing or weakening all of these requirements. The 2025 Rezone requires absolutely no affordable housing.

A public agency may not rely on mitigation measures of uncertain efficacy or feasibility. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 727.) “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (14 CCR § 15364.) Mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments. (14 CCR § 15126.4(a)(2).) In fact, proposals to provide benefits to legacy businesses, may not be legally allowable, let alone, legally enforceable. (*City of Santa Barbara v. Adamson* (1980) 27 Cal.3d 123, 134.)

The Rezone is reminiscent of the City's "urban renewal" of the Western Addition in the 1960s and 1970s, which wiped out what was at that time one of the most ethnically diverse communities in the United States and displaced much of the City's African-American community. Like the current "Family Zoning Plan," the urban renewal of the Western Addition was justified by the alleged need for more affordable housing. However, to make way for the new housing, the City destroyed a thriving African-American, Latino and Asian-American community, which never fully recovered, and the new housing was occupied largely by wealthier, white residents. The main difference is that the 2025 Family Zoning Plan is now targeting the City's Chinese Community, in the Richmond and Sunset Districts, which will undoubtedly face widescale displacement under the Rezone. This form of "White Urbanism" is now well-documented. (See, e.g,, Goetz, Whiteness and Urban Planning, *Journal of the American Planning Association*, Vol 86 (2020).)

The Federal Reserve Bank has concluded that supply-side constraints such as zoning and environmental regulation have absolutely no impact on housing costs. The single most significant factors driving high housing costs are extreme wealth disparities, and remote work. (Federal Reserve Bank of San Francisco, J. Mondragon, Supply Constraints Do Not Explain House Price and Quantity Growth Across U.S. Cities (2025), https://www.frbsf.org/research-and-insights/publications/working-papers/2025/03/supply-constraints-do-not-explain-house-price-and-quantity-growth-across-u-s-cities/); Federal Reserve Bank, J. Mondragon, Housing Demand and Remote Work (2025), https://www.nber.org/papers/w30041). Building more luxury housing does not decrease housing costs and in fact often leads to gentrification of previously affordable neighborhoods. Trickle-down economics did not work in the Reagan Administration and it will not work now.

Since the Rezone will displace both existing housing and people, it will have a significant impact that must be analyzed in a supplemental EIR. The SEIR must consider mitigation measures and feasible alternatives to reduce this impact.

D. AIR QUALITY AND CANCER RISK.

The Addendum admits that the Rezone will create significant air quality impacts, including additional cancer risk from fine particulate matter, known as PM-2.5. (Addendum 95). The Housing Element EIR admitted significant unmitigated PM-2.5 cancer risk (Addendum 90), but the Rezone will have even greater air quality and cancer risks since it allows more development and taller buildings, and will result in more vehicle miles traveled (VMT). (Addendum 90, 92-93).

The 2022 EIR concluded that buildings under 240-feet and 495 units would have less than significant construction air quality impacts. (Addendum 89). Taller buildings have significant PM-2.5 and nitrogen oxide impacts. (Addendum 94). But allowing taller and larger buildings, the Rezone will create more significant construction air quality impacts, including emissions of cancer-cause PM-2.5. The Rezone will have significant unmitigated cancer risk from PM-2.5 and the Rezone will change the distribution of those risks compared to the Housing Element. (Addendum 95).

The 2022 EIR concluded that even with the implementation of mitigation, air quality impacts would be significant and unmitigated. (2022 EIR, p. S-4, 4.6-56, 4,6-70.) By adding another 4,000 housing units, the 2025 Rezone will have "Significant effects previously examined will be substantially more severe than shown in the previous EIR." (CEQA Guidelines §15164(a)(3)(B).)

Attached hereto are the comments of Dr. Paul Rosenfeld and Matthew Hagemann, P.G., C. Hg., of the environmental consulting firm Soil, Water, Air Protection Enterprise (SWAPE). (Exhibit E). SWAPE notes that the Addendum erroneously states, "The proposed rezoning program and subsequent development is expected to result in the same significant criteria air pollutant impacts from construction but not substantially more severe impacts than those disclosed in the EIR" (Addendum 93). However, SWAPE points out that by adding 4,000 additional residential units, the Rezone vastly exceeds air quality significance threshold set by the Bay Area Air District ("BAAD").

The Bay Area Air District has published screening thresholds to determine whether proposed projects will have significant impacts to air quality. (https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en) Under the official BAAQMD thresholds, construction of 416 apartments is expected to have significant air quality impacts from the construction phase, and 638 apartments are expected to have significant operational air quality impacts. The addition of 4,000 residential units will vastly exceed these significance thresholds, and will therefore have a significant impacts on air quality that must be analyzed under CEQA. (SWAPE at 4).

SWAPE calculates that the additional 4,000 units of housing will create emissions of Reactive Organic Gases (ROGs) of 148 pounds per day (ppd) for the construction phase (far above the CEQA significance threshold of 54 ppd) and 145 ppd of operation ROG emissions (far above the CEQA significance threshold of 54 ppd). (SWAPE at 5). SWAPE concludes, "This finding indicates a potentially significant air quality impact that the Addendum did not identify or address. In our opinion, a subsequent EIR should be conducted to provide a more substantial calculation of the Project's emissions and a more detailed evaluation of the Project's potential air quality impacts." (SWAPE at 5).

When a project exceeds an Air District CEQA significance threshold, as here, this alone establishes substantial evidence that the project will have a significant adverse environmental impact. Indeed, in many instances, such air quality thresholds are the only criteria reviewed and treated as dispositive in evaluating the significance of a project's air quality impacts. (See, e.g. *Schenck v. County of Sonoma* (2011) 198 Cal.App.4th 949, 960 [County applies Air District's "published CEQA quantitative criteria" and "threshold level of cumulative significance"]; see also *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 110-11 ["A 'threshold of significance' for a given environmental effect is simply that level at which the lead agency finds the effects of the project to be significant"].) The California Supreme Court has shown the importance an air district significance threshold has in providing substantial

evidence of a significant adverse impact. (*Communities for a Better Environment v. South Coast Air Quality Management Dist*. (2010) 48 Cal.4th 310, 327 [estimated emissions in excess of air district's significance thresholds "constitute substantial evidence supporting a fair argument for a significant adverse impact"].)

Also, in 2025 city released a new APEZ (air pollutant exposure zone) map showing areas with high cancer risk. The Rezone allows development in some of these newly identified areas. This is a significant new information and a changed circumstance that was not known at the time of the 2022 EIR. (Addendum 95). The new APEZ areas include Sunset Blvd, and Lake Merced. These areas will receive significant development under the Rezone. This impact must be analyzed. (Addendum 96). The Addendum admits that the cancer risks created by the Rezone in the new APEZ areas are significant and unmitigated. (Addendum 97). The Northeast District is within the APEZ area. By moving over 5000 units of new housing to this area, the Rezone exacerbates cancer risks from airborne pollutants.

A supplemental EIR is required because "significant effects previously examined will be substantially more severe than shown in the previous EIR." (CEQA Guidelines section 15162(a)(3)(B).) Also, the new APEZ map constitutes, "new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete." (CEQA Guidelines section 15162(a)(3).)

SWAPE states,

> The Addendum proposes development in the Downtown, Marina, Mission, Northeast, and Western Addition planning districts, which have areas within the City's air pollutant exposure zones ("APEZ"). The Addendum states that "the proposed rezoning program may result in a small proportion of additional rezoned parcels being in the APEZ, which could increase the number of people exposed to the generally high pollutant concentrations in the APEZ" (p. 97).
>
> In 2025, the City identified new APEZ areas, defined as locations "where particulate matter (PM2.5) is greater than or equal to 9 µg/m3 or where the risk of cancer from air pollutants is greater than or equal to 100 in a million." (SWAPE at 5).

The Addendum concludes that this impact is "significant and unavoidable." (Addendum 97). SWAPE disagrees with this conclusion and proposes numerous feasible mitigation measures to reduce air pollution impacts that should be analyzed in a supplemental EIR. (SWAPE at 7-9). Among the mitigation measures suggested by SWAPE are requiring the use of ultra-low VOC paints, advanced air filtration units, emissions controls on backup generators, and many other measures. These mitigation measures should all be analyzed and imposed through a supplemental EIR process.

E. TRANSIT DELAY.

The Addendum admits that the Rezone will create significant impacts related to public transit delay, particularly along the busy 19th Avenue corridor, and on the 38-Geary and 19-Polk lines. (Addendum 71, 78, 84). The Addendum concludes that Rezone would contribute considerably to significant and unavoidable bus loading impacts. (Addendum 84). These impacts, particularly along the 19th Avenue corridor, will be exacerbated by the recent closure of the Great Highway, which has caused congestion on 19th Avenue by closing a major thoroughfare in the Western side of the City. The closure of the Great Highway is a changed circumstance that was unknown at the time of the 2022 EIR.

A supplemental EIR is required because "substantial changes [have] occur[ed] with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." (CEQA Guidelines §15162(a)(2).) The closure of the Great Highway is clearly a significant changed circumstance that was not analyzed in the 2022 EIR and that will impact the Transportation analysis for the Rezone.

F. PUBLIC SERVICES.

The Rezone will allow residential development on the site of the North Point Wet Weather Sewage Treatment Facility. This site was not slated for development in the 2022 Plan. This amendment will require either a replacement facility or vast amounts of infrastructure to transport sewage to other plants. The sewage currently treated by the North Point Plant must go somewhere. Urban Planner Deborah Holley states, "This City-owned and -operated sewage treatment plant is one of three facilities in San Francisco that treats wastewater. It is only active during wet weather and treats up to 150 million gallons a day (MGD) during rainstorms, or 26 percent of the wastewater treated on a rainy day." She continues, "The FEIR did not address the impacts of redevelopment of this treatment plant with housing because this site was not designated for rezoning. The rezoning program changes the allowable height limit on this site from 40' to 85' and increases the likelihood that it would be redeveloped with housing. The site is in the P (Public) District where residential uses in 100 percent Affordable Housing Projects and Educator Housing Projects are permitted, and other residential uses are conditional. There is no reason the City would include this site in the rezoning program other than the fact that the City believes rezoning this site will increase the likelihood of housing development at this location. Since it is inconceivable that a developer would build housing on top of a sewage treatment plant, the City needs to analyze the impacts associated with elimination of the sewage treatment plant." Ms. Holley states:

> Elimination of the sewage treatment plant would result in reduced sewage treatment capacity during wet weather. This would require (a) the construction of a new sewage treatment facility in this area of the city, or (b) the construction of new infrastructure to convey wastewater from the northeast quadrant of the city to the Oceanside Treatment Plant or the Southeast Treatment Plant in Bayview/Hunters

Point and expansion of one of these facilities to expand the treatment capacity by 150 MGD to compensate for the loss of the North Point facility.

The potential public health and hazardous materials impacts of redeveloping the site with housing must be identified and analyzed and mitigation measures must be identified in a supplemental EIR. This includes but would not be limited to testing and classification of contaminants, calculations of health risk, specific remediation measures, associated secondary impacts due to the excavation of contaminated soil, transportation and disposal of infrastructure, and treatment and disposal of contaminated water and soil.

CEQA does not allow the City to defer analysis of obvious sewage treatment needs. When a project will require construction of additional sewage treatment infrastructure, the CEQA document must analyze and mitigate the impacts of that necessary new construction. (*Sundstrom v. Cnty. of Mendocino* (1988) 202 Cal. App. 3d 296; *San Joaquin Raptor/Wildlife Rescue Ctr. v. Cnty. of Stanislaus* (1994) 27 Cal. App. 4th 713 (EIR was also inadequate with respect to project description by its lack of reference to wastewater treatment plant which was necessary element of project).)

V. GENERAL PLAN ANALYSIS.

The Rezone is legally prohibited because it is inconsistent with the General Plan. "The Legislature has mandated that every county and city must adopt a 'comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning.'" (*Citizens of Goleta Valley v. Bd. of Sups*. (1990) 52 Cal.3d 553, 570 (quoting Gov. Code §65300).) The Supreme Court has described the general plan as "the constitution for all future developments within the city or county." *Id*. (internal quotation marks omitted). The "propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." (*Id. DeVita v. Cty. of Napa*, 9 Cal. 4th 763, 803 (1995).) The "propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." (*Citizens of Goleta Valley v. Bd. of Sups.* (1990) 52 C.3d 553, 570.)

The Rezone is flatly inconsistent with the adopted General Plan, and its adopted Housing Element. The Rezone allows development in historic districts, such as North Beach and Telegraph Hill, which were protected from development in the General Plan. The Rezone allows development in Priority Equity Geographies that were protected from development in the General Plan. The Rezone allows building heights and density throughout the City that vastly exceed limits set forth in the General Plan. As such, the Rezone is legally prohibited unless and until the City amends its General Plan.

In addition, each of these General Plan inconsistencies is a significant impact that must be analyzed in an EIR. Any inconsistencies between a proposed project and applicable plans must be discussed in an EIR. (14 CCR § 15125(d); *City of Long Beach v. Los Angeles Unif. School Dist*. (2009) 176 Cal. App. 4th 889, 918; *Friends of the Eel*

River v. Sonoma County Water Agency (2003) 108 Cal. App. 4th 859, 874 (EIR inadequate when Lead Agency failed to identify relationship of project to relevant local plans).) A Project's inconsistencies with local plans and policies constitute significant impacts under CEQA. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4.)

VI. CONCLUSION.

For the foregoing reasons, we respectfully request that the Planning Commission direct the Planning Staff to prepare a Supplement EIR to analyze the Rezone and to consider feasible mitigation measures and alternatives to reduce its significant environmental impacts that were not analyzed in the 2022 EIR for the Housing Element. We further request that the Planning Commission conclude that the Rezone is prohibited since it is inconsistent with the City's General Plan.

Sincerely,

Richard Toshiyuki Drury
LOZEAU DRURY LLP

EXHIBIT A

December 1, 2025

Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

RE: Adequacy of the San Francisco Housing Element 2022 Update FEIR Addendum

Dear Mr. Drury,

The San Francisco Planning Department published an Addendum to the Final Environmental Impact Report for the 2022 Housing Element ("Housing Element FEIR") on September 3, 2025, stating that no supplemental or subsequent environmental review was required for the Family Housing Rezoning Program ("proposed rezoning program, Family Zoning Plan, FZP, rezoning plan").

Because there are potential new or more severe environmental impacts that would result from the proposed rezoning program that were not identified and analyzed in the Housing Element FEIR, a supplemental EIR should have been prepared instead of an Addendum.

Such impacts include, but are not limited to the following:

A. The rezoning plan would result in new impacts associated with the potential redevelopment of the North Point Wet Weather Sewage Treatment Facility which was not included and therefore not analyzed in the Housing Element FEIR but which, as a result of the rezoning plan, is now designated as a site for the development of housing.

B. The rezoning plan would result in more severe displacement impacts, particularly those associated with the addition of numerous parcels within the Priority Equity Geographies SUD that were added to the rezoning plan but not included, and therefore not analyzed, in the Housing Element FEIR.

My qualifications for preparing this analysis include over 25 years of professional experience in land use and environmental planning, including the management and preparation of CEQA documents, and a Master of Science degree in Urban Planning

from Columbia University. My resume can be accessed via this link: https://www.holleyconsulting.com/resume/.

The Addendum to the Housing Element FEIR maintains that no supplemental or subsequent environmental review is required for the proposed rezoning program because the environmental impacts were adequately identified and analyzed in the Housing Element FEIR, and the rezoning program "…would not result in any new or more severe environmental impacts than were identified previously."

Specifically, the Addendum states that "…no additional environmental review is required under CEQA Section 21166 and CEQA Guideline Sections 15162-15164 for the following reasons:

(1) the Family Housing Rezoning Program would not involve new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Housing Element EIR;
(2) no substantial changes have occurred that would require major revisions to the Final EIR due to the involvement of new environmental effects or a substantial increase in the severity of effects identified in the Housing Element EIR; and
(3) no new information of substantial importance has become available which would indicate that (i) the Family Housing Rezoning Program will have significant effects not discussed in the Final EIR; (ii) significant environmental effects will be substantially more severe; (iii) mitigation measure or alternatives found not feasible that would reduce one or more significant effects have become feasible, or (iv) mitigation measures or alternatives that are considerably different from those in the Housing Element EIR would substantially reduce one or more significant effects on the environment."

2022 FEIR compared to Proposed Rezoning

Baseline Map. In order to understand what was analyzed in the 2022 FEIR, and what was added in subsequent policy changes, I reconstructed "Figure 2-7 Projected Heights and Density Controls Under the Proposed Action" from page 2-25 of Vol. 1 of the FEIR. ***Figure 1***, below, provides the most detailed description of the parcel-level impacts of the proposed rezoning for parcels analyzed in the 2022 Final EIR.

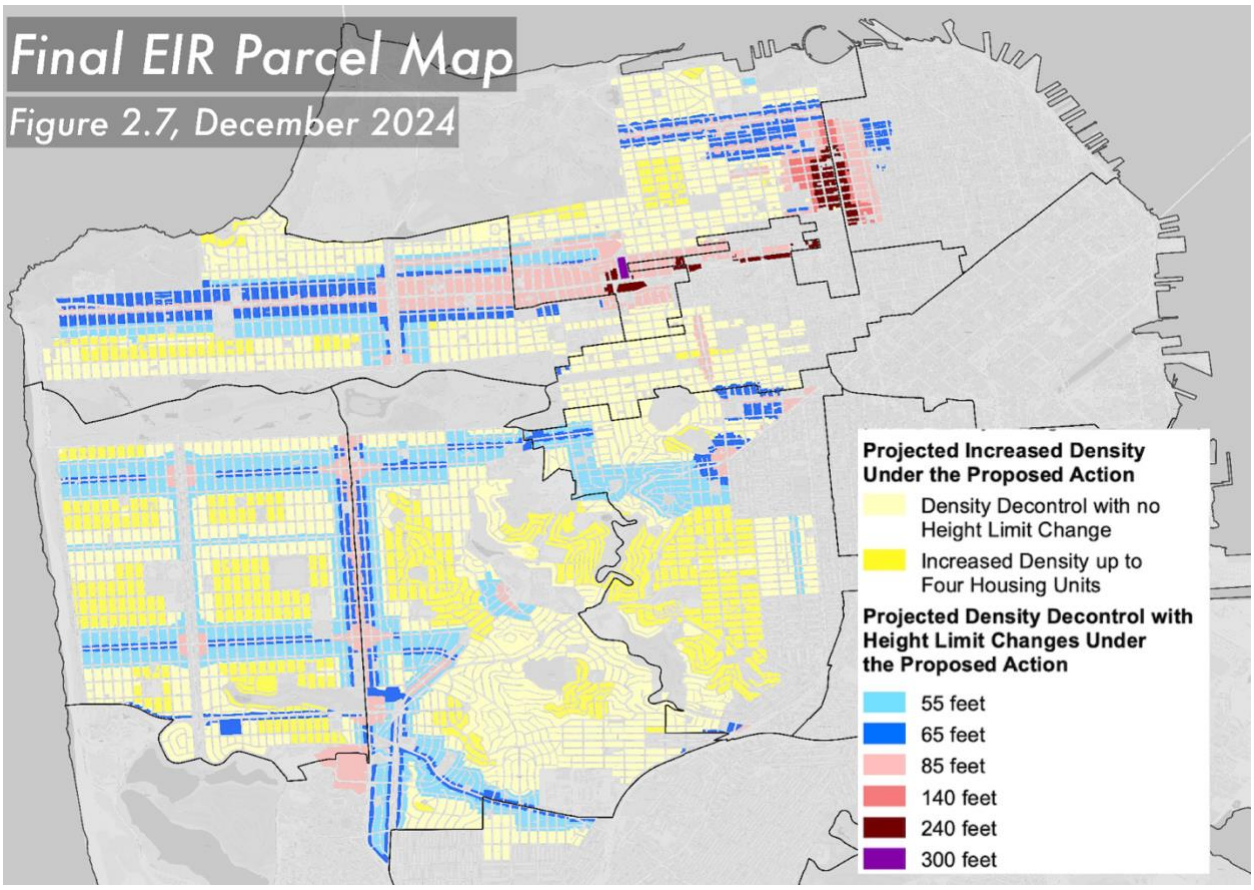

Figure 1. Baseline Map: 2022 FER Map Compared to the September 2025 Map, plus removing 3-unit+ Rent-Controlled Buildings and Hotels

The September 2025 map, based on the rezoning legislation introduced in board file 250700, was the most recent parcel-level map released by the Planning Department. The most significant amendments passed include exempting rent-controlled buildings of three units or larger from the local program, and exempting hotel parcels. *Planning recently released a November 17th map but it is not accurate as it does not yet exclude three-units+ rent controlled buildings.*

Figure 2 below shows that 6,938 new parcels were added in the proposed rezoning plan, 7,580 parcels have increased heights, and 16,135 parcels allow for greater densities. Associated unit counts were also estimated and are provided in the table following Figure 2.

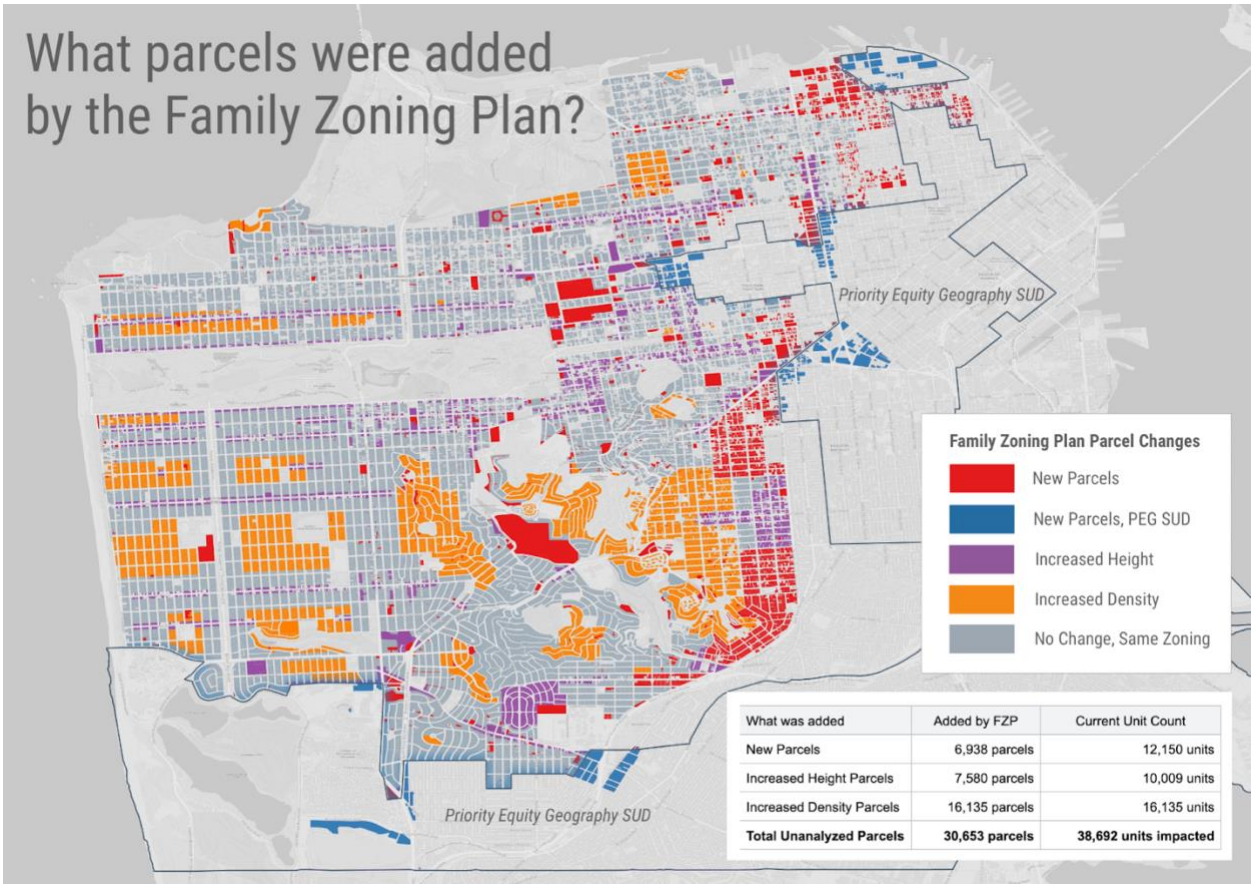

Figure 2. Parcels added and parcels with increased heights and densities under the rezoning

1. What was added to the Family Zoning Plan from the FEIR?

What was added	Added by FZP	Current Unit Count
New Parcels	6,938 parcels	12,150 units
Increased Height Parcels	7,580 parcels	10,009 units
Increased Density Parcels	16,135 parcels	16,135 units
Total Unanalyzed Parcels	**30,653 parcels**	**38,692 units impacted**

2) Scope of Family Zoning Plan vs. 2022 Final EIR

Total Count	Final EIR - 2022	Family Zoning Plan - 2025
Parcel Count	82,834	79,932
Current Units Count*	150,031	94,281
Area Added (sq ft)	257,461,954	254,211,574

** Residential and non-residential "units" (commercial spaces) impacted*

3. Existing Parcels with increased height limits

a. **7,580 parcels** with increased height limits
b. **10,009 currently existing units** in parcels with increased height limits
c. **31,424,690 sq ft** of total lot area in parcels with increased height limits

Height Limit Increase	Parcels	Current Unit Count
100' +	73	201
60' - 100'	34	31
40' - 60'	667	823
20' - 40'	3,244	4,906
< 20'	3,562	4,048

The following discussion describes potential impacts that were not analyzed in the CEQA document for the rezoning project. The Addendum is inadequate under CEQA and a supplemental EIR must be prepared to identify and analyze the potentially new and more severe impacts described below.

A. Rezoning of the North Point Wet Weather Sewage Treatment Facility

There are new potentially significant impacts associated with the proposed rezoning plan that were not identified and assessed in the Housing Element EIR or Addendum including impacts associated with development of the North Point Wet Weather Facility located at Bay Street and the Embarcadero. This City-owned and -operated sewage treatment plant is one of three facilities in San Francisco that treats wastewater. It is only active during wet weather and treats up to 150 million gallons a day (MGD) during rainstorms, or 26 percent of the wastewater treated on a rainy day.

The 2022 FEIR did not address the impacts of redevelopment of this treatment plant with housing because this site was not designated for rezoning at that time. The rezoning program changes the allowable height limit on this site from 40' to 85' and increases the likelihood that it would be redeveloped with housing. The site is in the P (Public) District where residential uses in 100 percent Affordable Housing Projects and Educator Housing Projects are permitted, and other residential uses are conditional.

There is no reason the City would include this site in the rezoning program other than the fact that the City believes rezoning this site will increase the likelihood of housing development at this location. Since it is inconceivable that a developer would build housing on top of a sewage treatment plant, the City needs to analyze the impacts associated with elimination of the sewage treatment plant.

Moreover, although the Addendum states that "It is likely that the Oceanside Water Pollution Control Plant would experience reduced pollutant loads under the proposed rezoning program compared to the adopted housing element because housing growth distribution under the proposed rezoning program would be more evenly distributed in the western and northern parts of the city and along transit corridors, instead of heavily concentrated in the Inner Sunset, Outer Sunset, and Richmond planning districts as assumed under the adopted housing element; thus pollutant load generation, would be more evenly distributed throughout the city rather than concentrated in the western portion of the city," there is no mention at all of the North Point treatment plant. (See pages 127-128 of the Addendum.)

Potentially significant impacts that should have been identified and analyzed in a supplemental EIR include, but are not limited to the following:

1. Elimination of the sewage treatment plant would result in reduced sewage treatment capacity during wet weather. This would require (a) the construction of a new sewage treatment facility in this area of the city, or (b) the construction of new infrastructure to convey wastewater from the northeast quadrant of the city to the Oceanside Treatment Plant or the Southeast Treatment Plant in Bayview/Hunters Point and expansion of one of these facilities to expand the treatment capacity by 150 MGD to compensate for the loss of the North Point facility.

2. The potential public health and hazardous materials impacts of redeveloping the site with housing must be identified and analyzed and mitigation measures must be identified in a supplemental EIR. This includes but would not be limited to

testing and classification of contaminants, calculations of health risk, specific remediation measures, associated secondary impacts due to the excavation of contaminated soil, transportation and disposal of infrastructure, and treatment and disposal of contaminated water and soil.

B. More severe displacement Impacts would result from the proposed rezoning program than were assumed in the Housing Element FEIR

Potentially significant displacement impacts that should have been identified and analyzed in a supplemental EIR include, but are not limited to the following:

1. ***Rezoning and displacement of tenants in two-unit rent-controlled buildings***. As shown below, under the proposed rezoning, there are a significant number of two-unit rent-controlled buildings on parcels with an existing height limit of 40 feet that would be rezoned to allow heights of 50', 65' and 85', and would no longer require setbacks, creating greater incentives and likelihood that they would be redeveloped under the proposed rezoning. In other words, it is reasonably foreseeable that they would be redeveloped and therefore should have been considered in the CEQA review for the project.

Rent Controlled Parcels

What was added	Parcels affected	Existing units affected
New Parcels	1,237 parcels	2,474 units
Increased Height Parcels	1,818 parcels	3,636 units
Increased Density Parcels	783 parcels	1,566 units
Total Rent Controlled Parcels	3,838 parcels	7,676 units

It is widely accepted that tenants of two-unit rent-controlled buildings already have fewer protections than tenants who live in buildings with three or more units because a two-unit building can more easily be converted into condos. In two-unit buildings, all an owner needs to do is move in, and they can evict a tenant to do so.

The inclusion of parcels with two-unit rent controlled buildings in the rezoning plan and the associated displacement impacts need to be identified and assessed in a supplemental EIR.

2. ***Rezoning and displacement in the Priority Equity Geographies Special Use District.*** Section 249.97 (b) of the San Francisco Planning Code states that "The Priority Equity Geographies SUD is comprised of areas or neighborhoods with a higher density of vulnerable populations" and that the 2022 Update of the Housing Element of the General Plan ((2022 Housing Element) identifies them as "***areas***…***where zoning changes must be tailored to serve the specific needs of the communities that live there; and where programs that stabilize communities and meet community needs need to be prioritized***."

   As shown in ***Figure 2*** above and quantified below, close to 1,000 parcels in the proposed rezoning program that were not analyzed in the Housing Element FEIR are located within the PEG SUD. Displacement impacts for residents in these areas are more severe than for residents outside of the SUD.

   New Priority Equity Geography Parcels
   a. 939 parcels
   b. 2,321 current existing units (including RC and non-RC)
   c. 70 two-unit RC buildings, 140 units

   The inclusion of parcels in the Priority Equity Geographies SUD and the associated displacement impacts need to be identified and assessed in a supplemental EIR.

3. ***Rezoning and displacement of Laguna Hospital and Rehabilitation Center occupants***. As shown in ***Figure, 2*** above, the 62-acre Laguna Honda hospital and rehabilitation center located 375 Laguna Honda Boulevard was added to the rezoning plan, and if redeveloped would result in significant displacement impacts for the long-term nursing home residents.

   Laguna Honda has 769 beds and offers short-term rehab and long-term nursing care. in the Forest Hill neighborhood of San Francisco.

   The FEIR did not address the impacts of redevelopment of Laguna Honda with housing because this site was not designated for rezoning. The rezoning program changes the allowable height limit on this site from 40' which covers the majority of the 62 acres under existing height limits, to 85' for the entire site, and increases the likelihood that it would be redeveloped with housing. The site is in the P (Public) District where residential uses in 100 percent Affordable Housing Projects and Educator Housing Projects are permitted, and other residential uses are conditional.

There is no reason the City would include this site in the rezoning program other than the fact that the City believes rezoning this site will increase the likelihood of housing development there.

Because the impacts of redevelopment of Laguna Honda Hospital and Rehabilitation Center was not analyzed in the Housing Element FEIR, a supplemental EIR is needed to determine the impacts and required mitigation measures.

EXHIBIT B

November 30, 2025

Mr. Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

RE: Family Zoning Plan (Rezone) – Impacts on Historic Resources

Dear Mr. Drury,

This letter sets forth my professional opinion concerning the impacts on historic resources from the proposed San Francisco Rezoning Plan ("Rezone"), also known as the "Family Zoning Plan."

As a professional with 32 years of experience in historic preservation and with the California Environmental Quality Act (CEQA), I meet the Secretary of the Interior's Professional Qualification Standards in History and Architectural History. I also have the following credentials: received a Master of Arts Degree in Architectural History from the University of Virginia's School of Architecture; previously served as president of the San Francisco Landmarks Advisory Board (appointed by Mayor Newsom); since 2012 have continuously been on the City of San Francisco Planning Department's approved consultant pool for historic resources consultants; and certified by the San Francsico Contract Monitoring Division (CMD) as a woman-owned Local Business Enterprise (LBE). I have written innumerable historic resource and historic district designation and evaluation reports throughout the course of my career.

While the City of San Francisco (City) prepared and certified an Environmental Impact Report (EIR) for its 2022 Housing Element, the proposed Rezone is vastly different from the rezoning scenarios studied in the 2022 EIR. Nevertheless, the Planning Department proposes to rely on an Addendum (September 3, 2022) to the previously certified EIR. A rezoning of this magnitude requires thorough environmental review under CEQA so that the City's residents and decision-makers can be aware of its impacts, can consider all feasible mitigation measures and alternatives, and can have a robust and open discussion prior to making irreversible changes to San Francisco's landscape for all time.

The Rezone would result in a myriad of significant new impacts that were not analyzed in the 2022 EIR or included in the Housing Element, not the least of which are impacts to historic resources. The Rezone would result in significant impacts to historic resources that have not yet been analyzed. The 2022 EIR found significant and unmitigated impacts to historic resources, but the Rezone's impacts are far greater and substantially more severe than shown in the previous EIR, with significant and unmitigated impacts. Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).)

As set forth in the Attachments to this letter, the Rezone would allow the demolition and redevelopment on, near, or within areas containing historic resources. Many known and designated, either locally under Article 10 of the Planning Code, or through state or federal historic designation programs, are within areas that were not included for rezoning in the 2022 Housing Element or analyzed in the 2022 EIR, while others were included in the analysis, but have since been upzoned or changed to form based density or have significantly higher heights on or around them by the Upzone. None of the potentially significant impacts that could result from redevelopment of these historic resources were analyzed in the 2022 EIR. See the following attachments for further analysis: Attachment 1 - Historic Resource Impact Analysis of Rezone and Attachment 2 - North Beach National Register of Historic Places Historic District Parcel Analysis.

Since this new information provided in the Attachments constitute significant and substantially more severe effects not discussed in the 2022 EIR, a Supplemental EIR is required to analyze and mitigate these impacts. The newly identified impacts are beyond the scope of the 2022 EIR. The Addendum barely mentions additional historic resources impacts and fails to analyze impacts of the drastically additional height and density increases as they relate to known historic resources. Further, the Addendum fails to analyze changes in zoning use districts on designated historic resources or historic districts or areas with known concentrations of "A" rated historic resources, which are identified, but not yet designated resources.

Further, the Rezone now includes the following language related to Bonuses for "Historic Preservation." However, these bonuses, as shown below, encourage height increases, facadism, and other over-scaled additions that would result in diminished historic fabric and result in unintended impacts to historic resources. Additionally, this proposed legislation, added in the September 11, 2025 version of the legislation, has not been evaluated for its potentially significant impacts on historic resources.

The following language has been added to Section 206.10(e) of the Rezone legislation providing additional height and square footage bonuses for the "preservation" of Historic Building.

> *(e)* ***Additional Height, Square Footage, and Other Bonuses.*** *HC-SF Projects that contain certain uses, amenities, or other building features are eligible for additional bonuses and code modifications, as described below.*
>
> *********

(6) ***Preservation of Historic Buildings.*** *In districts other than Residential districts, projects proposing an alteration to a Historic Building and/or constructing new buildings on sites that contain a Historic Building shall be permitted to include additional square footage, as provided below:*

(A) up to 1.5 times the gross floor area foregone by retaining the Historic Building and complying with Objective Standards pertaining to Historic Buildings, including through setting back building additions and/or new construction in relation to the Historic Building. For the purposes of this subsection (e)(56)(A), the foregone gross floor area shall be equal to the gross floor area within the volume that would otherwise be permitted under the Planning Code and all applicable Objective Standards, inclusive of modifications allowed pursuant to this Section 206.10, but is not being constructed in order to accommodate a reduced building mass above or around a Historic Building and that complies with or exceeds the setbacks or mass reductions required by the Objective Standards pertaining to Historic Buildings. The Zoning Administrator may publish further guidance on the calculation of foregone gross floor area; and

(B) for Historic Buildings with storefronts that contain character-defining features, an additional 0.25 square feet for every square foot of space in the storefront, provided that the project preserves the storefront in compliance with Objective Standards pertaining to Historic Buildings; and

(C) *horizontal or vertical additions to accommodate this extra square footage, except that any such additions shall not:*

(i) exceed 20 feet above the Housing Choice-SF height limit (Section 263.19); or

(ii) reduce the required rear yard above the ground floor to less than 15 feet where the site abuts the rear yard of adjacent parcels containing residential uses.

(D*) The Historic Building* and/or historic storefront *shall be maintained in compliance with the Preservation Design Standards for the life of the project, and the requirement shall be recorded in a Notice of Special Restrictions.*

This late addition of the above language to the legislation has the great potential to cause impacts to historic resources, instead of preserving them, as it would allow large sections of historic buildings to be demolished and over scaled additions and height increases to be implemented as bonuses.

For the reasons listed above, and as set forth in the Attachments, it is my professional opinion that the Rezone, if approved, would have additional and substantially more severe impacts to historic resources than were analyzed in the certified EIR. These potentially significant environmental impacts must be analyzed and mitigated under the California Environmental Quality Act ("CEQA") through a full recirculated Supplemental EIR.

Sincerely,

Bridget Maley
Principal

Attachment 1: Historic Resource Impact Analysis of Rezone
Attachment 2: North Beach National Register of Historic Places Historic District Parcel Analysis

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Attachment 1: Historic Resource Impact Analysis of Family Zoning Plan (Rezone)
November 30, 2025
Compiled by Bridget Maley, architecture + history, llc

The Family Zoning Plan (Rezone) would result in significant new impacts on historic resources that were not included in the 2022 Housing Element or analyzed in its associated Environmental Impact Report (2022 EIR). The area of the Rezone is significantly larger than the area included in the 2022 Housing Element and analyzed in the 2022 EIR.

It should be noted that all projects using the Rezone would be subject to form-based density (i.e. density decontrol) regardless of height limit or underlying zoning district. These height and density changes would encourage demolition of smaller-scale historic resources throughout the Rezone area.

In addition, for many parcels within the Rezone area, increases to the existing base height limits and/or changes from density limited to form based density (i.e. density decontrol) would be allowed for projects NOT using the Rezone, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses.

The Housing Element EIR Addendum No. 1 (September 3, 2025) fails to analyze impacts of additional height and density increases described above, as well as changes in zoning use districts, on designated historic resources and historic districts or on areas with known concentrations of "A" rated historic resources, but not yet designated as historic districts, including, but not limited to those resources listed below.

The list below includes landmarks and contributors to historic districts designated pursuant to Article 10 of the San Francisco Planning Code that may be removed from the Upzone by a pending amendment to the Upzone legislation.

Historic Resources Not Evaluated in 2022 Housing Element EIR

The following districts and individual historic resources were not included in the 2022 Housing Element or analyzed in the 2022 EIR, but are now included in the Rezone as of November 2025.

- Fully documented North Beach National Register Historic District submitted to the State Historic Preservation Office and awaiting hearing by the State Historical Resource Commission was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone could have significant impacts to this identified historic district, including heights rezoned from 40 feet to 50 feet in block Block 0076. (See Attachment 2: List of Historic Resources in North Beach Historic District in Rezone.)

- Designated Northeast Waterfront Article 10 Historic District. Sansome Street Area Revision contained in "Appendix D: Memorandum Regarding Potential Zoning Map Changes in Supervisor District 3" disclosed the intent to include in the Rezone Plan areas within this Historic District centered along Sansome Street include the following seventeen parcels: Block 0085/Lots 005 and 048; Block 0106/Lots 001, 002, 003, 004, and 042; Block 0112/Lots 008 and 009; Block 0113/Lots 006, 041, 040, and 063; Block 0134/Lot 001; and Block 0135/Lots 007, 008, and 009. This area was not included in the

2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Eligible Washington Square Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone now includes six parcels on Filbert Street between Powell Street and Stockton Street, including the Church of Saints Peter and Paul and the Priests' Residence, which could result in significant impacts to this Historic District.

- Eligible Upper Grant Avenue Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone now includes seven contributory buildings in this District along Filbert Street, Medau Place, and Grant Avenue (Blk 0088/Lots 5, 41-57, and 9), which could result in significant impacts to this Historic District.

- Designated Otis Elevator Company National Register No. 99001265 (1 Beach Street; Parcel 0018/001). This parcel is rezoned from its existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Grabhorn Press Building National Register No. 97000349 (1335 Sutter Street; Parcel 0690/012A). This parcel was rezoned from its existing height limit of 130 feet to to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses.This drastic upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Thomas Payne House National Register No. 80000847 (1409 Sutter Street; Parcel 0689/025). This parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses. This drastic upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Myrtle Street Flats Building, both National Register No. 76000520 and Article 10 Landmark No. 71 (234-248 Myrtle Street; Parcel 0714/020), sometimes referred to as part of the Goodman Building. This parcel is rezoned from its existing height limit of 130 feet to 650 feet. The Rezone also increases the base height limit from 130 feet to 260 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses.This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Washington Square Article 10 Landmark No. 226 (1651 Stockton Street and Filbert Street; 0102/022001). The parcels on the northern edge of Washington Square are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this park.

- Designated Article 10 "Structure of Merit" The Cannery (600 Beach Street; Parcel 0010/001). This parcel is rezoned from its existing height limit of 40 feet to 65 feet. As the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this site.

- Designated Building at 1840-1842 Eddy Street National Register No. 73000437 (1840-1842 Eddy Street, Parcel 1127/015). This parcel is rezoned from its existing height limit of 65 feet to 85 feet and changed to form-based density (density decontrol). This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Building at 45-57 Beideman Place National Register No. 73000436 (45-57 Beideman Place, Parcel 1100/118). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Building at 33-35 Beideman Place National Register No. 73000435 (33-35 Beideman Place, Parcel 1100/095). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1331-1335 Scott Street National Register No. 73000440 (1331-35 Scott Street, Parcel 1100/120). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1321 Scott Street National Register No. 7300439 (1321 Scott Street, Parcel 1100/049). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1249-1251 Scott Street National Register No. 73000442 (1249-51 Scott Street, Parcel 1127/035). This parcel now included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1239-1245 Scott Street National Register No. 7300441 (1239-45 Scott Street, Parcel 1127/043). This parcel now included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Temple Sherith Israel National Register #10000114 (2266 California St., Parcel 0637/011). Now included in the Rezone, this parcel is being upzoned from its existing 40 feet to 85 feet with a new base height of 50 feet. It is also changed to form based density and rezoned to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Dallam-Merritt House National Register #84001185 (2355 Washington Street, Parcel 0613/021). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated site of Third Baptist Church California Registered Historical Landmark No. 1010 (483 Greenwich Street, Parcel 0087047). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Fillmore-Pine Building National Landmark No. 82002247 (1940-1946 Fillmore Street, Parcel 0660/023). Now in the Rezone, this parcel is being rezoned from its existing height limit of 40 feet to 65 feet. This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Park View Hotel National Register No. 83001235 (750 Stanyan Street, Parcel 1250/025). Now in the Rezone, this parcel is being rezoned from its existing height limit of 50 feet to 65 feet. This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Delane House National Register No. 82000984 (70 Buena Vista Terrace, Parcel 2608/013). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 584 Page Street National Register No. 85002195 (584 Page Street, Parcel 0842/017). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Moss Beach House National Register No. 83001232 (1626 Great Highway, Parcel 1895/038). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Real Estate Associates (TREA) Houses National Register No. 85000705 (2503, 2524, 2530 and 2536 Clay Street (Parcel 0630/032, 0611/008, 0611/009 and 0611/010). Now in the Rezone, the house at 2503 Clay is upzoned from 40 feet to 65 feet. These 4 historic houses were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Wilford Houses National Register No.85001914 (2121 & 2127 Vallejo Street, Parcels 0565/021and 0565/022). Now in the Rezone, these parcels adjoin parcels upzoned to 65 feet. These 2 historic houses were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Sinton House National Register No. 11000944(1020 Francisco Street, Parcel 0476002C).Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Russian Hill Paris Block Architectural Historic District National Register of Historic Places Historic District No. 87002288. The Rezone includes four parcels in this District between Green Street and Macondray Lane (Block 0121/Lots 005, 006, 049, and 056), which were not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this Historic District.

- Designated Russian Hill Macondray Lane National Register Historic District No. 87002286. The Rezone includes this entire Historic District, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this Historic District, especially corner parcels that could be up to 65 feet in height in this residential district.

- Designated Port of San Francisco Embarcadero National Register Historic District No. 06000372. The Rezone includes increased height and density along the Embarcadero, especially on Bay, North Point, Beach and Jefferson Streets, which could impact this Historic District. These heights, not included in the 2022 Housing Element or analyzed in the 2022 EIR, could result in significant impacts to this Historic District.

- Designated Golden Gate Park National Register Historic District No. 04001137. The Rezone includes height increases along Fulton Street and Lincoln Boulevard bordering the north and south sides of Golden Gate Park and Stanyon Street bordering the east side. The heights along Fulton Street are increased from 40 feet to 85 feet and along

Lincoln from 40 feet to 65 feet, both streets are changed to form-based density (density decontrol) and rezoned to RTO-C that allows commercial uses on the ground floors. Heights along a portion of Stanyan Street are rezoned from 50 feet to 65 feet. Heights are also increased in places along Fell and Oak Streets in the Panhandle of the Park. These proposed height, density, and use changes in the Rezone were not included in the 2022 Housing Element or analyzed in the 2022 EIR and would have significant impacts on this designated historic district.

- Designated Presidio of San Francisco National Historic Landmark Historic District No. 66000232. Development proposed in the Rezone adjacent to the Presidio of San Francisco at 300 Lake Street; Parcel No. 1354/001, upzoned from 40 feet to 65 and from 65 feet to 85 feet. Also upzoned at the Lombard Gate from 40 feet to 65 feet. Additionally, development in the residential zoned areas of Presidio Terrace and Sea Cliff heights would be allowed to 65 feet on 8,000 square foot parcels. These Rezone heights were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Lower Nob Hill Apartment Hotel National Register Historic District No. 91000957. Height increases along the edges would impact this designated Historic District. The increased heights at Bush and Leavenworth Streets from the existing height limit of 65 feet to 120 feet and Polk Street between Geary and Sutter Streets from the existing height limit of 80 feet to 240 feet. These heights were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could impact this Historic District.

- Designated Veterans Affairs Medical Center National Register Historic District No. 05001112 (4150 Clement Street). Along the southern edge of this District the Rezone includes increases from the existing height limit of 40 feet to 65 feet on Clement Street. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could impact this Historic District.

- Designated Cable Car National Register Historic District No. 66000233. The Cable Car lines located within areas being upzoned and/or density decontrolled by the Upzone Plan could be significantly impacted. These include, without limitation, those lines along the following routes: Hyde between Beach and Washington, Washington between Hyde and Mason, Jackson between Leavenworth and Hyde, California between Van Ness and Mason, Mason between Green and Columbus, Columbus between Mason and Taylor, and Taylor between Chestnut and Francisco. Height increases adjacent to these streets could impact these linear transit historic resources, and construction activities resulting from development incentivized by the Upzone could cause extensive service interruptions. Impacts to the Cable Car National Register Historic District were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Geneva Office Building and Power House (S.F. & San Mateo Railroad Co.Office Building), both National Register No. 10000111 and Article 10 Landmark No. 180 (500 Geneva; Parcel 6972/036). The Rezone Plan upzones this publicly owned site from the existing height of 40 feet to 85 feet and includes it in the Non-Contiguous SFMTA Special Use District, which allows the site to be developed for mixed use residential development. The Rezone Plan also increases the base height limit from 40

feet to 50 feet and changes the density to form-based, which would allow development using the State Density Bonus or other State programs that provide density or development bonuses. New development on and adjacent to this historic site could result in significant impacts. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Eligible Hayes Valley Residential Historic District, an eligible California Register Historic District. The current Rezone includes a significant portion of the District. This area of Hayes Valley was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Eligible Northpoint Sewage Treatment Plant Historic District, an eligible National Register and California Historic District. The District includes 101 North Point (Parcel 0033/005), 66 Bay Street (0034/002) and 160 Bay Street (0033/003). This entire site is increased from the existing height limit of 40 feet to 85 feet. The Rezone of this eligible district was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could have significant impacts to this District.

- Designated Dietle Residence Article 10 Landmark No.48 (294 Page Street, Parcel 0839/017). Located within and adjacent to the Hayes Valley Residential Historic District, an eligible California Register Historic District, the Rezone includes this parcel which is rezoned to RTO-1.This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Designated Nightingale House Article 10 Landmark No. 47 (201 Buchanan Street, Parcel 0858/002). Located within and adjacent to the Hayes Valley Residential Historic District, an eligible California Register Historic District, the Rezone includes this parcel which is rezoned to RTO-1.This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Designated McMorry-Lagan Building Article 10 Landmark No.164 (188-198 Haight Street, Parcels 0852/033 and 0852/034). Located within and adjacent to the Hayes Valley Residential Historic District, an eligible California Register Historic District, the Rezone includes this parcel which is rezoned to RTO-1.This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Designated Duboce Park Article 10 Historic District, specifically the contributory buildings located along Waller and Steiner Streets being rezoned RTO-1. Although certain parcels within the Duboce Park Historic District are proposed for removal from the Rezone by a pending amendment to the Upzone legislation (see list below), the contributory buildings located along Waller and Steiner Streets would remain in the Rezone. This Historic District was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

Historic Resources Evaluated in 2022 Housing Element and 2022 EIR, But Now with Significant Height Increases

- Designated St. Luke's Episcopal Church, National Register No. 100009644 (1755 Clay; Parcel 0622/013). Included in the 2022 EIR as being upzoned from its existing height limit of 80 feet to 240 feet, but height increased by the Rezone to 350 feet with a base height of 140 feet. These increased heights were not studied in the 2022 EIR and could have significant impacts to this historic site. Further, as the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed from the new base height.

- Designated Paige Motor Company National Register No. 83001234 (1699 Van Ness Parcel 0642/001). Included in the 2022 EIR as being upzoned from existing height limit of 80 feet to 240 feet, but height increased by the Rezone to 350 feet with a base height of 140 feet. These increased heights were not studied in the 2022 EIR and could have significant impacts to this historic site. Further, as the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed from the new base height.

- Eligible Ocean Avenue Commercial Historic District, a documented eligible California Register Historic District under review by the Planning Department. The EIR analyzed the height along Ocean Avenue at a height of 65 feet, which was increased by the Rezone to 85 feet. This increased height was not studied in the 2022 EIR and could have significant impacts to this Historic District.

- Eligible fully documented Ingleside Terraces National Register Historic District submitted to the State Historic Preservation Office and awaiting hearing by the State Historical Resource Commission. The EIR analyzed the height along Ocean Avenue, Block 6915, with a height of 65 feet, which was increased by the Rezone to both 85 feet and 140 feet. These increased heights were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could have significant impacts on this fully documented historic district.

- Designated St. Francis Wood National Register Historic District No. 100007846 was listed on June 30, 2022. This historic district was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone could have significant impacts on this historic district.

- *The Gardens in the City; San Francisco Residence Parks, 1906-1940, Historic Context Statement* identified 8 residence parks neighborhoods as eligible historic districts. Since this was last heard by the Historic Preservation Commission in April 2021, St. Francis Wood has been listed on the National Register of Historic Place No. 100007846 and Ingleside Terraces has been fully documented as a National Register Historic District and submitted to the State Historic Preservation Office. Six other neighborhoods Jordan Park, West Clay Park, Forest Hill and Forest Hill Extension, Sea Cliff, Lincoln Manor and

Balboa Terrace are identified as potential historic districts. These six neighborhoods would be impacted by upzoning in and along the edges.

- Historic Category "A" rated buildings across the city would be impacted by the Rezone as it affords no protection for these previously identified, but not designated historic resources. The City of San Francisco Planning Department has previously required full Historic Resource Evaluations for projects involving Category "A" rated buildings. This policy change was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

The following landmarks and contributors to historic districts designated pursuant to Article 10 of the San Francisco Planning Code may be removed from the Upzone by a pending amendment to the Upzone legislation:

- Designated Telegraph Hill Article 10 Historic District. The Rezone includes this entire Historic District, which was not in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Alamo Square Article 10 Historic District. The Rezone includes most of this Historic District, including increased heights from 40 feet to 50 feet along Scott Street. This District was not in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to the District.

- Designated Webster Street Article 10 Historic District. The Rezone includes this entire Historic District, which was not in the 2022 Housing Element or analyzed in the EIR.

- Designated Haslett Warehouse, both National Register No. 75000172 and Article 10 Landmark No. 57 (680 Beach Street; Parcel 0010/002). he Rezone includes this parcel, owned by the United States National Park Service, upzoning it from its existing height of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the EIR.

- Designated San Francisco Art Institute Article 10 Landmark No 85 including the Diego Rivera Gallery Landmark No 284 (800 Chestnut Street; Parcel 0049/001). This parcel is rezoned from its existing height of 40 feet to 50 feet. This was not included in the 2022 Housing Element or analyzed in the EIR.

- Designated Ghiradelli Square, both National Register No. 82002249 and Article 10 Landmark No. 36 (920 North Point; Parcel 0452/002). This parcel is rezoned from its existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the EIR.

- Designated Goodman Building/Emeric Building, both National Register No. 75000473 and Article 10 Landmark No. 71 (1117 Geary Blvd; Parcel 0714/018). This parcel is rezoned from its existing height limit of 130 feet to 650 feet. The Rezone also increases the base height limit from 130 feet to 260 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or

other State programs that provide density or development bonuses. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 650 feet, which could result in significant impacts to this historic resource.

- Designated First Unitarian Church Article 10 Landmark No. 40 (1187 Franklin Street; Parcel 0713/034). This parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and, as the density is form-based, use of the State Density Bonus or other State programs that provide development bonuses would be encouraged. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 650 feet, which could result in significant impacts to this historic resource.

- Designated Earl C. Anthony Packard Showroom Article 10 Landmark No. 153 (901 Van Ness Avenue; Parcel 0719/002). The parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and, as the density is form-based, use of the State Density Bonus or other State programs that provide development bonuses would be encouraged. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 500 feet and 350 feet, which could result in significant impacts to this historic resource.

- Designated Don Lee Auto Showroom, both National Register No. 01001179 and Article 10 Landmark No.152 (1000 Van Ness Avenue; Parcel 0715/014). This parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and as the density is form-based, use of the State Density Bonus or other State programs that provide development bonuses would be encouraged. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 500 feet and 650 feet, which could result in significant impacts to this historic resource.

- Designated Stradtmuller House, both National Register No. 76000523 and Article 10 Landmark No. 35 (819 Eddy Street; Parcel 0743/015). This parcel is rezoned from its existing height limit of 130 feet to 300 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 350 feet, which could result in significant impacts to this historic resource.

- Designated Engine Company Number 31 Fire House Article 10 Landmark No. 220 (1088 Green St (0121/010). This parcel is now within the Rezone but was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic building.

- Designated Clay Theater Article 10 Landmark No. 302 (2261 Fillmore Street; Parcel 0630/002). This parcel and area of Fillmore Street are rezoned from their existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and this could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 65 feet, which could result in significant impacts to this historic resource.

- Designated Calvary Presbyterian Church National Register No 78000755 and Article 10 Landmark No. 103 (2501 Fillmore Street; Parcel 0587/027). This parcel and area of Fillmore are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this historic site.

- Designated Grace Cathedral Article 10 Landmark No. 170 (1100 California Street; Parcel 0246/001). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR. This could result in significant impacts to this site.

- Designated Chambord Apartments, both Article 10 Landmark No. 106 and National Register No. 84001184 (1298 Sacramento Street; Parcel 0221/125). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR. This could result in significant impacts to this site.

- Designated Old Flood Mansion, Pacific Union Club, both Article 10 Landmark No. 64 and National Register No. 66000230 (1000 California Street; Parcel 0245/001). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR. This could result in significant impacts to this site.

- Designated Westfield House Article 10 Landmark No. 135 (1198 Fulton Street, Parcel 0777/015) located in the Alamo Square Article 10 Historic District. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR. The Rezone could result in significant impacts to this historic site and the Alamo Square Historic District.

- Designated Third Baptist Church Complex Article 10 Landmark No. 275 (1399 McAllister Street, Parcel 0778/013). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR. The Rezone could result in significant impacts to this historic site.

- Designated Archbishop's Mansion Article 10 Landmark No. 151 (1000 Fulton Street, Parcel 0778/006) located in the Alamo Square Article 10 Historic District. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone could result in significant impacts to this historic site and the Alamo Square Historic District.

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- Designated Abner Phelps House, both National Register No. 71000187 and Article 10 Landmark No. 32 (1111 Oak Street; Parcel 1218/050). This parcel is rezoned from its existing height limit of 40 feet to 50 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Designated Sarah Mish House, both National Register No. 79000534 and Article 10 Landmark No. 62 (1153 Oak Street; Parcel 1218/029). This parcel is rezoned from its existing height limit of 40 feet to 50 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Firehouse Engine Company No. 2, both Article 10 Landmark No. 89 (1152 Oak Street, Parcel 1215/010) and a contributor to the Buena Vista North Historic District, an eligible California Register Historic District. The inclusion of this parcel in the Rezone was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned 65 feet and 85 feet, this could result in significant impacts to this historic resource.

- Designated Richard Doolan/Norman Larson Residence Article 10 Landmark No. 253 (557 Ashbury Street, Parcel 1231/009). As the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned to 65 feet with form-based density and rezoned to RTO-C, this could result in significant impacts to this historic resource.

- Designated Theodore Green Apothecary Article 10 Landmark No. 182 (500 Divisadero Street, Parcel 1203/017A). This parcel is rezoned from its existing height limit of 65 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Designated Charles L. Hinkel House and Carriage House Article 10 Landmark No. 190 (280 Divisadero Street; Parcel 1238/023). This parcel is rezoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Designated Old Saint Patrick's Church Article 10 Landmark No. 6 (1820 Eddy Street, Parcel 1127/007A). This parcel now included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-3 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing

Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned to 65 feet with form-based density and rezoned to RTO-C, this could result in significant impacts to this historic resource.

- Glazer-Keating House Article 10 Landmark No. 251 (1110 Taylor Street, Parcel 0222/018). The Rezone now includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Merryvale Antiques (S.F. Gas Light Co.) Article 10 Landmark No 58 (3640 Buchanan Street, Parcel 0459/003) This parcel is included in the Rezone and changed to form-based density (density decontrol). The Rezone now includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Ladies Protection and Relief Society Article 10 Landmark No 320 (3400 Laguna Street, Parcel 0471/003). The Rezone now includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Blackstone Court Article 10 Historic District (30 Blackstone Court, 1545 Lombard Street, and 1549 Lombard Street (Parcels 0504/003, 0504/003H & 0504/019). The Rezone increases the height of two of the parcels in this District from 40 feet to140 feet and the density is changed to form-based. This Historic District was not included in the 2022 Housing Element or analyzed in the EIR. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned to 140 feet with form-based density, this could result in significant impacts to this historic resource.

- North End Police Station and Garage Article 10 Landmark No. 218 (2475 Greenwich, Parcel 0513/015). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Filbert Street Cottages Article 10 Landmark No 232 (1338 Lombard Street, Parcel 0524/031). This parcel is rezoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Metro Theater Article 10 Landmark No 261 (2055 Union Street, Parcel 0541/018. The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 65 feet. This site was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- The Colonial Dames (McElroy) Octagon House Article 10 Landmark No. 17 and National Register No 720000250 (2645 Gough Street, Parcels 0544/001 and 0544/001C. This historic site, included in the Upzone, is rezoned from its existing height limit of 40 feet to 65 feet and its density changed to form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Alhambra Theater Article 10 Landmark No. 21 (2320-366 Polk Street, Parcel 0548/022). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 to 85 and now form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- The Burr Mansion Article 10 Landmark No.31 and National Register #14000967 (1772 Vallejo Street, Parcel 0552/029). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Golden Gate Valley Carnegie Library Article 10 Landmark No. 300 (1801 Green Street, Parcel 0554/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Casebolt House Article 10 Landmark No 51 (2727 Pierce Street, Parcel 0560/005). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Church For The Fellowship of All People Article 10 Landmark No. 309 (2041 Larkin Street, Parcel 0572/003). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Engine Company No. 8 Truck No. 4 Article 10 Landmark No. 188 (1648 Pacific St., Parcel 0574/011). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 feet to 350 feet. This extreme upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 350 feet, this could result in significant impacts to this historic resource.

- Talbot-Dutton House Article 10 Landmark No. 57 (2200 Franklin/1782 Pacific Avenue, Parcel 0575/010). The Rezone includes this parcel, which is upzoned from its existing height limit of 80 feet to 240 feet, its density is changed form-based, and rezoned from residential to RTO-C. This extreme rezoning was not included in the 2022 Housing Element or analyzed in the2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 240 feet to 350 feet, this could result in significant impacts to this historic resource.

- St. Brigid's Church Article 10 Landmark No. 252 (2151 Van Ness Avenue, Parcel 575/015). The Rezone includes this parcel, which is upzoned from its existing height limit of 80 feet to 350. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 240 feet to 350 feet, this could result in significant impacts to this historic resource.

- Bourne Mansion Article 10 Landmark No 38 (2550 Webster Street, Parcel 0580/013). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 65 feet, and rezoned from residential to RTO-C. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 65 feet, this could result in significant impacts to this historic resource.

- Leale House Article 10 Landmark No. 45 (2475 Pacific Avenue, Parcel 0587/018). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Whittier Mansion Article 10 Landmark No. 75 and National Register No 76000524 (2090 Jackson St, Parcel 0591/007). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Haas-Lilienthal House Article 10 Landmark No. 69 and National Register No 730000438 (2007 Franklin St. 0600/002). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Spreckels Residence Article 10 Landmark No. 197 (2080 Washington Street, Parcel 0601/005. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Sacred Heart Parish Complex Article 10 Landmark No.316 and National Register 10000112 (660 Oak Street, Parcel 0828/012; 735 Fell Street, Parcel 0828/022A; 554 Filmore Street, Parcel 0828/22; and 546-548 Filmore Street, Parcel 0828/21). The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the EIR.

- Market Street Masonry Historic District Article 10 Historic District and listed in the California Register of Historical Resources (7 non-contiguous historic buildings on Market Street Between Franklin Street and Valencia Street, including Parcels 3504/038, 3504/040, 3504/046, 3504/001, 0854/004 and 0854/005, and the Miramar Apartments at 1582 Market Street, Parcel 0836/010. The Rezone includes the parcels in this District, which are upzoned from their existing height limit of 85 feet to 140 feet. Even if these parcels are removed from the Upzone, because they are surrounded by parcels rezoned to 140 feet, this could result in significant impacts to this historic resource.

- Health Sciences Library Article 10 Landmark No. 115 (2395 Sacramento Street, Parcel 0637/016). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- William Vale House Article 10 Landmark No. 168 (2226 California Street, Parcel 0637/040). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet, and the density is changed to form-based. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 85 feet, this could result in significant impacts to this historic resource.

- Chambers Mansion Article 10 Landmark No.119 (2220-2222 Sacramento Street, Parcel 0627/054). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Richard E. Queen House Article 10 Landmark No. 198 (2212 Sacramento Street, Parcel 0627/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Atherton House Article 10 Landmark No. 70 and National Register No. 79000527 (1990 California Street, Parcel 0640/010). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet, and rezoned from residential to RTO-C. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 85 feet, this could result in significant impacts to this historic resource.

- Isaac Wormser House/John C. Coleman House Article 10 Landmark No. 53 (1834 California Street, Parcel 0641/005). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Lilienthal-Orville Pratt House Article 10 Landmark No. 55 (1818-1820 California Street, Parcel 0641/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Golden Gate Commandery of the Knights Templar (Macedonia Missionary Baptist Church Article 10 Landmark No. 202 (2135 Sutter Street, Parcel 0682/006). The Rezone includes this parcel, which is upzoned from its existing height limit of 50 feet to 85 feet and is now form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Richardson Hall Article 10 Landmark Nos. 256, 257, and 258 (55 Laguna Street, Parcel 0870/001). The Rezone includes these Landmarks, which are upzoned from their existing height limits to 85 feet and their density has been changed to form-based. These buildings were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Carmel Fallon Building Article 10 Landmark No. 223 and Contributor to the designated Hayes Valley Residential Historic District listed on the California Register of Historic Resources (1800-1806 Market Street, Parcel 0871/014). The Rezone includes this parcel, which is upzoned from its existing height limit of 85 feet to 120 feet and its density has been changed to form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone,

because it is surrounded by parcels rezoned to 140 feet, this could result in significant impacts to this historic resource.

- Roos Residence both Article 10 Landmark No. 56 and National Register 09000805 (3500 Jackson Street, Parcel 0970/002). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Ellingwood House Article 10 Landmark No. 207 (2799 Pacific Ave, Parcel 0978/010) and within the California Register eligible Presidio Heights Historic District. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Koshland House Article 10 Landmark No. 95 and National Register No. 84001186, within the CA eligible Presidio Heights Historic District. (3800 Washington, Parcel 0989/028). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Ortman-Shumate House Article 10 Landmark No. 98 (1901 Scott Street, Parcel 1027/003). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Theodore Roosevelt Jr. High School Article 10 Landmark No. 285 (460 Arguello Street, Parcel 1061/049). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- San Francisco Memorial Columbarium Article 10 Landmark No. 209 (1 Loraine Court, Parcel 1084/002).The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Clunie House Article 10 Landmark No. 128 (301 Lyon Street, Parcel 1207/008). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Alfred G. Hanson Residence Article 10 Landmark No. 196 (128 27th Avenue, Parcel 1332/049). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- St. John's Presbyterian Church Article 10 Landmark No. 83 (201 Arguello Boulevard, Parcel 1361/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Campfire Girls Building Article 10 Landmark No. 169 (325 Arguello Boulevard), Parcel 1432/003). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Richmond Branch Library Article 10 Landmark No. 247 (351 9th Avenue, Parcel 1441/007). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Refugee Shack Article 10 Landmark No. 171 (1227 24th Avenue, Parcel 1726/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Doelger Building Article 10 Landmark No.265 (320-26 Judah Street, Parcel 1763/020). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet and its density has been changed to form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 85 feet, this could result in significant impacts to this historic resource.
- Old Fire House Article 10 Landmark No.29 (1348 10th Avenue, Parcel 1764/031). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Sunset Branch Library Article 10 Landmark No. 239 (1305-49 18th Street, Parcel 1773/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 65, 85 and 140 feet, this could result in significant impacts to this historic resource.
- Shriners' Hospital for Crippled Children Article 10 Landmark No.221 (1601 19th Avenue, Parcel 1924/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- San Francisco Conservatory of Music Article 10 Landmark No. 242 (1201 Ortega Street, Parcel 2115/037). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- The McCormick House Article 10 Landmark No. 208 (4040-4042 17th Street, Parcel 2623/012). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 120 feet, its density is changed form-based, and it is rezoned from residential to RTO-C. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 140 feet with form based density, this could result in significant impacts to this historic resource.
- Alfred E. (Nobby) Clarke Mansion Article 10 Landmark No. 80 (250 Douglass St., Parcel 2700/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Miller-Joost House Article 10 Landmark No. 79 (3224 Market Street, Parcel 2704/040). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- David Lewis House Article 10 Landmark No.186 (4143 23rd Street, Parcel 2804/040). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 171 San Marcos Avenue (aka Cowell House) Article 10 Landmark No. 270 (171 San Marcos Avenue, Parcel 2882/035). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- El Rey Theater Article 10 Landmark No.274 (1970 Ocean Avenue, Parcel 3280/018). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Juvenile Court and Detention Center Article 10 Landmark No. 248 (170 Otis Street, Parcel 3513/207). The Rezone includes this parcel, which is upzoned from its existing height limit of 125 feet to 160 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 396-398 12th Street (aka San Francisco Eagle Bar) Article 10 Landmark No. 295 (396-398 12th Street, Parcel 3522/014). The Rezone includes this parcel, which is upzoned from its existing height limit of 55 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Saint Francis Lutheran Church Article 10 Landmark No. 39 (152 Church Street, Parcel 3537010). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Swedish American Hall Building Article 10 Landmark No. 267 (2168-2174 Market Street, Parcel 3542/062). The Rezone includes this parcel, which is upzoned from its existing height limit of 40-50 feet to 120 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 120 feet and 160 feet with form based density, this could result in significant impacts to this historic resource.

- 2117-2123 Market Street (aka New Era Hall) Article 10 Landmark No. 277 (2117-2123 Market Street, Parcel 3543/012). The Rezone includes this parcel, which is upzoned from its existing height limit of 40-50 feet to 120 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 120 feet and 160 feet with form based density, this could result in significant impacts to this historic resource.

- 22 Beaver Street (aka Benedict-Gieling House) Article 10 Landmark No. 284 (22 Beaver Street, Parcel 3561060). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 50 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- The Jose Theater/Names Project Building Article 10 Landmark No. 241 (2362 Market Street, Parcel 3562/011). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 feet to 120 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the

Upzone, because it is surrounded by parcels rezoned to 120 feet and 160 feet with form based density, this could result in significant impacts to this historic resource.

- Mission Dolores Article 10 Landmark No. 1 and National Register No.72000251 (310-20 Dolores Street, Parcel 3566/001). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 50 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the EIR.

- Mission High School Article 10 Landmark No. 255 (3750 18th Street, Parcel 3579/006). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Twin Peaks Tavern Article 10 Landmark No. 264 (3997 17th Street, Parcel 3582/071). The Rezone includes this parcel as being upzoned from its existing height limit of 65 feet to 160 feet and its density is changed to form-based. While this site was included in the 2022 Housing Element and the 2022 EIR as upzoned to 85 feet, the Rezone upzones it to 160 feet. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 160 feet with form based density, this could result in significant impacts to this historic resource.

- Castro Theater Article 10 Landmark No. 100 (429-431 Castro Street, Parcel 3582/085). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 feet to 85 feet and its density is changed to form-based. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is adjacent to parcels rezoned to 160 feet with form based density, this could result in significant impacts to this historic resource.

- Castro Camera Article 10 Landmark No. 227 (573-75 Castro Street, Parcel 3583/061). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 50 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Axford House Article 10 Landmark No. 133 (1190 Noe Street, Parcel 6538/048). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Carnegie Noe Valley/Sally Brunn Branch Library Article 10 Landmark No. 259 (451 Jersey Street, Parcel 6539/034). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 651 Duncan Street (aka Lyon-Martin House) Article 10 Landmark No. 292 (651 Duncan Street, Parcel 6604/036). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Sunnyside Conservatory Article 10 Landmark No. 78 (236 Monterey Blvd, Parcel 6770/057). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Joseph Leonard/Cecil F. Poole House Article 10 Landmark No. 213 (90 Cedro Avenue, Parcel 6908/016). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 1345 Ocean Ave (aka Ingleside Presbyterian Church and the Great Cloud of Witnesses) Article 10 Landmark No. 273 (1345 Ocean Avenue, Parcel 6942/050). The Rezone includes this parcel, which is upzoned from its existing height limit of 50 feet to 85 feet.

- This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Sherman House Article 10 Landmark No. 49 (2160 Green Street, Parcels 0540/030 and 0540/028). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Gibbs Residence and Caretaker's Cottage Article 10 Landmark 203 (2622-24 Jackson Street and 2624-29 Pacific Avenue, Parcels 0585/008, 0585/009 and 0585/010). The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the 2022 EIR.
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- Southern Pacific Co. Hospital Complex Article 10 Landmark No. 192 and National Register 89000319 (1400-1599 Fell Street & 1509-1599 Hayes Street, Parcels 1206/002 and 1206/003). Also within the Panhandle Historic District, an eligible California Register Historic District. The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Edward Coleman House Article 10 Landmark No. 54 (1701 Franklin Street, Parcels 0641/014 and 0641/015). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Duboce Park Article 10 Historic District, is proposed for removal from the Rezone except for the contributory buildings located along Waller and Steiner Streets are proposed to be rezoned RTO-1, remaining in the Rezone. This Historic District was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

Attachment 2: North Beach National Register of Historic Places Historic District
Parcel Analysis Within Rezone
November 30, 2025
Compiled by Bridget Maley, architecture + history, llc

Address	APN Number	Year Built	District Status
490 Lombard St	0062017B	1926	C
1916-18 Stockton St	0062017C	1940	C
1922-24 Stockton St	0062017D	1940	C
1934-36 Stockton St	0062017E	1940	C
1946-48 Stockton St	0062019	1908	C
1952-56 Stockton St	0062020	1908	C
1958-60 Stockton St	0062021	1906	C
379-99 Chestnut St/1952-56 Stockton	0062022	1906	C
1940 Stockton St	0062052-058	1980	NC
401 Chestnut St/1957-61 Stockton	0063001	c. 1906	C
1951-55 Stockton St	0063002	1906	C
1943-47 Stockton St	0063003	1907	C
1935-41 Stockton St	0063004	1907	C
1929-33 Stockton St	0063005	1907	C
1923-25 Stockton St	0063006	1908	C
1915-17 Stockton St	0063007	1907	C
1901-05 Stockton St	0063009	1906	C
520-24 Lombard St	0063010	1911	C
526-30 Lombard St	0063011	1909	C
532-36 Lombard St	0063012	1912	C
538-42 Lombard St	0063013	1912	C
544-46 Lombard St	0063014	1916	C
548 Lombard St	0063015	1926	NC
566-76 Lombard St	0063017	1908	C
590-94 Lombard St	0063018	1925	C
2006-08 Powell St	0063018A	1924	C

Attachment 2: North Beach National Register of Historic Places Historic District
Parcel Analysis Within Rezone
November 30, 2025
Compiled by Bridget Maley, architecture + history, llc

Address	APN Number	Year Built	District Status
2018-20 Powell St	0063018C	1924	NC
2024-30 Powell St	0063019	1906	C
2038-40 Powell St	0063021	1956	NC
2044-48 Powell St	0063022	1909	C
2050-64 Powell St	0063023	1907	C
475 Chestnut St	0063024	1946	C
461-67 Chestnut St	0063025	c. 1907	C
455-59 Chestnut St	0063025A	1908	C
449-53 Chestnut St	0063026	1912	C
443-47 Chestnut St	0063027	1908	C
437-41 Chestnut St	0063027A	1908	C
427 Chestnut St	0063028	1932	C
421-23 Chestnut St	0063029	1907	C
1907-13 Stockton St	0063030-033	1906	C
560-64A Lombard St	0063034-036 & 16A	1907	C
2032-34 Powell St	0063037-038	1912	C
2061-65 Powell St	0064001	1906	C
2055-59 Powell St	0064002	1908	C
2049-53 Powell St	0064003	1909	C
2043-47 Powell St	0064004	1909	C
2035-41 Powell St	0064005	1909	C
2027-31 Powell St	0064006	1907	C
2017-21 Powell St	0064007	1912	C
602-04 Lombard St	0064009	1926	C
616-18 Lombard St	0064032	1922	C
2011-15 Powell St	0064033-035	c. 1912	C
513-19 Lombard St	0076001	1917	C

Attachment 2: North Beach National Register of Historic Places Historic District
Parcel Analysis Within Rezone
November 30, 2025
Compiled by Bridget Maley, architecture + history, llc

Address	APN Number	Year Built	District Status
1847-57 Stockton St	0076003	1910	C
1843 Stockton St	0076004	1906	NC
1815-25 Stockton St	0076006	1907	C
1807-09 Stockton St	0076007	1907	C
1801-03 Stockton St	0076008	1908	C
622-24 Greenwich St	0076009	1908	C
628-30 Greenwich St	0076010	1908	C
638-42 Greenwich St & 632A Greenwich	0076011	1906	C
644-46 Greenwich St	0076012	1925	C
652-56 Greenwich St	0076013	1906	C
658-64 Greenwich St	0076014	1907	C
666-76 Greenwich St	0076015	1906	C
678-80 Greenwich St	0076016	1906	C
1906 Powell St & 690-92 Greenwich	0076017	1923	C
1918-22 Powell St	0076020	1906	C
1930-34 Powell St	0076022	1912	C
1936-38 Powell St	0076023	1906	C
1942-46 Powell St	0076024	1912	C
1948-54 Powell St	0076025	1914	C
1956-66 Powell St	0076025A	1914	C
585-87 Lombard St	0076025B	1908	C
567-79 Lombard St	0076026	1914	C
563-65 Lombard St	0076027	1906	C
551-61 Lombard St	0076027A	1914	C
547-49 Lombard St	0076028	1913	C
537-39 Lombard St	0076030	1907	C

Attachment 2: North Beach National Register of Historic Places Historic District
Parcel Analysis Within Rezone
November 30, 2025
Compiled by Bridget Maley, architecture + history, llc

Address	APN Number	Year Built	District Status
1 Tuscany Alley	0076032	1906	C
529-31 Lombard St	0076033	1925	C
525-27 Lombard St	0076033A	1925	C
543-45 Lombard St	0076034-035	1925	C
1839-41 Stockton St	0076054-055	c. 2014	NC
1924-26 Powell St	0076056-057	1922	C
1865-76 Stockton St	0076058-059	1906	C
5-11 Edith St/1721-25 Grant	0077008	1913	C
1707-09 Grant Ave	0077009	1907	NC
1703-05 Grant Ave	0077010	1909	NC
500-12 Greenwich St	0077011	1908	C
514-16 Greenwich St & 15-17 Edith	0077012	1924	C
520-22 Greenwich St & 19-21 Edith	0077013	1910	C
528-30 Greenwich St & 25-27 Edith	0077014	1909	C
532-34 Greenwich St	0077015	1908	C
540 Greenwich St & 33-35 Edith	0077016	1931	C
544-46 Greenwich St & 43-45 Edith	0077017	1912	C
550-52 Greenwich St & 49-51 Edith	0077018	1912	C
558-60 Greenwich St	0077019	1911	C
562-64 Greenwich St	0077020	1908	C
568-70 Greenwich St	0077021	1908	C
586-90 Greenwich St	0077023	1908	C
1800-04 Stockton St	0077023A	1907	C
1814 Stockton St	0077024	1966	C
1816-20 Stockton St	0077025	1911	C
1822-26 Stockton St	0077026	1915	C
1828-32 Stockton St	0077027	1914	C

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Address	APN Number	Year Built	District Status
1848 Stockton St	0077030	1907	C
1852-56 Stockton St	0077031	1906	C
1858-60 Stockton St	0077032	1914	C
1864-66 Stockton St	0077032A	1915	C
576-80 Greenwich St	0077049-051	1997	NC
1840-44 Stockton St	0077052-054	1911	C
1653-67 Grant Ave	0088001	1908	C
1647-51 Grant Ave	0088002	1908	C
1639-45 Grant Ave	0088003	1913	C
1635-37 Grant Ave	0088004	1908	C
12-26 Medau Place & 1615-33 Grant	0088005	1908	C
1601 Grant Ave	0088006	1965	NC
540-50 Filbert St & 51-61 Medau	0088009	1909	C
552-56 Filbert St & 63-65 Medau	0088010	1906	C
558-62A Filbert St	0088011	1907	C
566 Filbert St	0088012	c. 1907	C
570-74 Filbert St & 12-18 Krausgrill	0088013	1907	C
579-81 Greenwich St	0088023	1908	C
561 Greenwich St	0088025	1961	C
551-57 Greenwich St	0088026	1911	C
547-49 Greenwich St	0088027	1911	C
533-57 Greenwich St	0088029	1912	C
517-23 Greenwich St	0088031	1912	C
1-3 Kramer Place	0088034	1910	C
577 Greenwich St	0088036	1909	C
567-69 Greenwich St	0088037	1906	C
19-33 Medau Place	0088041-048	1909	C

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Address	APN Number	Year Built	District Status
526-30 Filbert St	0088052-054	1912	C
532-36 Filbert St	0088055-057	c. 1986	NC
539-45 Greenwich St	0088058-061	1913	C
525-31 Greenwich St	0088071-072	1914	C
7-9 Kramer Place	0088073-074	1910	C
608-20 Filbert St	0089011	1951	C
622-26 Filbert St	0089013	1913	C
630-34 Filbert St	0089014	1910	C
650-60 Filbert St	0089015	1912-1939	C
666 Filbert St	0089016	1917	C
673-77 Greenwich St	0089022A	1915	C
667-71 Greenwich St	0089022B	1914	NC
695-99 Greenwich St	0089022C	1925	C
659-59BGreenwich St	0089024	1907/2002	C/NC
651-55 Greenwich St	0089025	1908	C
643 Greenwich St	0089026	1907	C
637-41 Greenwich St	0089027	1911	C
637A-641A Greenwich St	0089027	unknown	C
619-21 Greenwich St	0089029	1961	C
1856-60 Powell St	0089031-036	1934	C
625-27 Greenwich St	0089038	1908	C
631A-C Greenwich St	0089039-041	1983	NC
1850-52 Powell St	0089042-043	1933	C
661-65 Greenwich St	0089044-046	1906	C
680 Filbert St	0089048-049	1971	NC
690 Filbert St	0089050-051	1961	NC

EXHIBIT C

Shawn Smallwood, PhD
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24 October 2025

RE: San Francisco Housing Element 2022 Update FEIR Addendum

Dear Mr. Drury,

I write to comment on potential impacts on biological resources from the proposed Addendum to the San Francisco Housing Element 2022 Update Final Environmental Impact Report (FEIR). The FEIR, which was adopted by the Board of Supervisors and later signed by the Mayor on 31 January 2023, evaluated the impacts on the environment that could result from adoption and implementation of the San Francisco Housing Element 2022 Update. According to the Addendum, the FEIR anticipated "future actions, such as San Francisco Planning Code … amendments, designation of housing sustainability districts, and approval of development projects consistent with the goals, policies, and actions of the housing element update." The Addendum characterizes the proposed actions as "reasonably foreseeable changes," and states that its purpose "is to evaluate the environmental impacts of the rezoning program and document the San Francisco Planning Department's … determination that these impacts are adequately addressed in the FEIR." I am concerned that the proposed actions in the Addendum have not been adequately addressed, and that the action's impacts on wildlife would be excessive and highly significant.

My qualifications for preparing expert comments are the following. I hold a Ph.D. degree in Ecology from University of California at Davis, where I also worked as a post-graduate researcher in the Department of Agronomy and Range Sciences. My research has been on animal density and distribution, habitat selection, wildlife interactions with the anthrosphere, and conservation of rare and endangered species. I authored many papers on these and other topics. I served as Chair of the Conservation Affairs Committee for The Wildlife Society – Western Section. I am a member of The Wildlife Society and Raptor Research Foundation, and I've lectured part-time at California State University, Sacramento. I was Associate Editor of wildlife biology's premier scientific journal, The Journal of Wildlife Management, as well as of Biological Conservation, and I was on the Editorial Board of Environmental Management. I have performed wildlife surveys in California for thirty-seven years. My CV is attached.

POTENTIAL IMPACTS ON THE WILDLIFE COMMUNITY

The Addendum claims that the FEIR's analysis of wildlife impacts potentially caused by the originally planned 50,000 residential units have already addressed the impacts of the additionally proposed of 4,000 residential units. It further claims that the change in

outlay of the height and density of the originally planned 50,000 residential units are irrelevant to the analysis of potential impacts on wildlife. Deemed in no need of additional environmental review is the planned addition of 4,000 residential units, major shifts in the spatial distribution of the original 50,000 units, and increases in maximum building heights from 300 feet to 650 feet.

The Addendum (p. 48) points out that the FEIR had determined that future development associated with the adopted housing element would not adversely affect candidate, sensitive, or special-status species or sensitive natural communities, nor would it interfere with wildlife movement. I disagree with these determinations as they applied to the originally planned 50,000 residential units, as these determinations were simply not credible in the face of this much change to the environment. Here and now the City attempts to extend these same claims to the development associated with an additional 4,000 residential units and to substantial shifts in the spatial and vertical outlay of all 54,000 residential units.

One rationalization for the determinations was that special-status species such as peregrine falcon are adapted to the structural environment of San Francisco. Another was that compliance with existing state and federal regulations would ensure less-than-significant impacts to nesting birds. And for bats, the rationale was that compliance with the open space element of the general plan (Chapter 8 of the San Francisco Environment Code), would avoid potential impacts. These rationalizations, however, were speculative, having cited no evidence in their support. There was no citation of any comparative study of peregrine falcon population performance within the City versus in natural areas. There was no citation of monitoring data that would support the notion that existing state and federal regulations have been preventing significant impacts to nesting birds in the face of development pressure. There was no citation of monitoring data that would support the notion that Chapter 8 of the San Francisco Environment Code has managed to avoid development impacts on bats. Instead of relying on scientific inference, each argument leading to less-than-significant impact determinations was speculative. And this same strategy is carried forward in the Addendum with respect to the added 4,000 residential units and the changes in lateral and vertical outlay.

In fact, the evidence is overwhelming that overall bird abundance is on the decline, having declined 29% across North America over the past half-century (Rosenberg et al. 2019). In fact, all but three of the bat species in California are special-status species, indicating that bats as a taxonomic group are of serious conservation concern in California. And in fact, along with my co-investigator I have measured substantial declines in birds and special-status species as results of development projects (Smallwood and Smallwood 2023). The Addendum selects Peregrine falcon as an anecdote to imply that all birds simply adapt to the cityscape, but even the Peregrine falcon is vulnerable to window collisions. As another anecdote to the Addendum's, I happened to be in a meeting with attorneys of the California Attorney General's Office and agents with the U.S. Fish and Wildlife Service when we observed a Peregrine falcon nearly collide with our 14th story window as it chased after a rock pigeon in Oakland. And yet another anecdote from a few years ago, a Peregrine falcon fledgling fatally

collided with a window on the same UC Berkely building where it attempted its first flight from the nest. Peregrine falcons are vulnerable to window collision mortality just like any other bird, and perhaps even more so.

The Addendum does not consider the potential loss and fragmentation of the aerosphere in which these species travel and forage. The aerosphere is that part of the gaseous atmosphere where birds and bats and other volant animals with wings migrate, disperse, forage, perform courtship and where some of them mate (Davy et al. 2017, Diehl et al. 2017). Nor does the Addendum give any consideration to the potential loss and fragmentation of aerohabitat, which is that portion of the aerosphere used by each species (Kunz et al. 2008), and usually within 1,000 feet of the ground. Although both the peregrine falcon and bats often take prey on the ground, these animals are known for taking prey largely on the wing. These animals hunt other volant wildlife, which means that both these hunters and their prey perform vital life functions and interact with each other within the aerosphere. As for nesting birds, there would be no nesting birds without the birds' access to the aerosphere. Despite the vital importance of the aerosphere to peregrine falcons, nesting birds, and to bats, the Addendum fails to recognize the aerosphere as essential habitat to volant wildlife.

The Addendum does recognize that the new buildings would pose barriers to movement and collision hazards to birds. At page 49, the Addendum warns, "Changes to building heights could result in new impacts on migratory species if they result in flight paths being obstructed, more bird strikes, or impacts on falcon nesting habitat." The Addendum then dismisses these potential impacts by citing the adoption in the Aesthetics section of the FEIR of planning code section 139's Standards for Bird-Safe Buildings. However, there exist major logic problems with this purported solution. First, the standards for bird-safe buildings do not avoid the barrier effects of buildings, and in fact the strategic objective of bird-safe building guidelines is to increase the visibility of buildings as barriers to bird movement so that birds less often collide with the structural glass on the exteriors of the buildings. Second, the Standards for Bird-Safe Buildings, while meritorious as a first step toward reducing bird-window collision mortality, are of unmeasured efficacy. While it is great that the City adopted the Bird-Safe Guidelines, the City has yet to follow up with any study of whether or to what degree the Standards truly minimize or reduce bird-window collision mortality. In the face of this uncertainty, the additional 4,000 residential units, greater building heights, and revised spatial distribution could result in significantly larger numbers of collision fatalities compared to the 2022 plan, despite implementation of the City's Standards for Bird-Safe Buildings.

In my assessment, there are 147 special-status species of wildlife documented near enough to the project site to warrant a closer look at their occurrence likelihoods for the purpose of predicting potential project impacts (Table 1). Of these 147 special-status species, 14 are bats that, if they truly occur where construction would take place, would be at risk of losing aerohabitat in which they travel and forage. Another 112 special-status species of wildlife would be birds, 49 of which have been documented throughout the project area, eight of which are known to be centrally located, six are known to Golden Gate Park or Lake Merced, and 19 of which have been documented as generally

coastal. All these bird species would be vulnerable to collision mortality and greater expenditures of indispensable energy to negotiate the structural hazards of another 4,000 residential units and the reallocation of vertical building heights across the planning area.

All the birds represented in Table 1 can quickly fly from wherever they have been documented to any of the new buildings that would be part of the added project, so they would all be within brief flights to the proposed project's windows. At the California Academy of Sciences, the glass facades facing adjacent gardens killed 0.077 and 0.086 birds per m^2 of glass per year (Kahle et al. 2016), which might look like small numbers at first read, but which translate to large numbers of dead birds when projected to the extent of glass in the project (see below).

Window collisions are often characterized as either the second or third largest source or human-caused bird mortality. The numbers behind these characterizations are often attributed to Klem's (1990) and Dunn's (1993) estimates of about 100 million to 1 billion bird fatalities in the USA, or more recently by Loss et al.'s (2014) estimate of 365-988 million bird fatalities in the USA or Calvert et al.'s (2013) and Machtans et al.'s (2013) estimates of 22.4 million and 25 million bird fatalities in Canada, respectively. The proposed project would impose windows in the airspace normally used by birds.

Glass-façades of buildings intercept and kill many birds, but they are differentially hazardous to birds based on spatial extent, contiguity, orientation, and other factors. At Washington State University, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a three-story glass walkway (no fatality adjustments attempted). Prior to marking the windows to warn birds of the collision hazard, the collision rate was 84.7 per year. At that rate, and not attempting to adjust the fatality estimate for the proportion of fatalities not found, 4,574 birds were likely killed over the 54 years since the start of their study, and that's at a relatively small building façade. Accounting for the proportion of fatalities not found, the number of birds killed by this walkway over the last 54 years would have been about 14,270. And this is just for one 3-story, glass-sided walkway between two college campus buildings.

Klem's (1990) estimate was based on speculation that 1 to 10 birds are killed per building per year, and this speculated range was extended to the number of buildings estimated by the US Census Bureau in 1986. Klem's speculation was supported by fatality monitoring at only two houses, one in Illinois and the other in New York. Also, the basis of his fatality rate extension has changed greatly since 1986. Whereas his estimate served the need to alert the public of the possible magnitude of the bird-window collision issue, it was highly uncertain at the time and undoubtedly outdated more than three decades hence. Indeed, by 2010 Klem (2010) characterized the upper end of his estimated range – 1 billion bird fatalities – as conservative. Furthermore, the estimate lumped species together as if all birds are the same and the loss of all birds to windows has the same level of impact.

Table 1. *Occurrence likelihoods of special-status bird species at or near the proposed project site, according to eBird/iNaturalist records (https://eBird.org, https://www.inaturalist.org) and on-site survey findings, where 'Very close' indicates within 1.5 miles of the site, "nearby" indicates within 1.5 and 4 miles, and "in region" indicates within 4 and 30 miles, and 'in range' means the species' geographic range overlaps the site.*

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
San Bruno elfin butterfly	*Callophrys mossii bayensis*	FE	In region	iNat obscured points
Monarch	*Danaus plexippus*	FC	On site	Throughout
Bay checkerspot butterfly	*Euphydryas editha bayensis*	FT	In region	iNat obscured points
Mission blue butterfly	*Icaricia icarioides missionensis*	FE	In region	iNat obscured points
Callippe silverspot butterfly	*Speyeria callippe callippe*	FE	In region	iNat obscured points
Myrtle's silverspot butterfly	*Speyeria zerene myrtleae*	FE	In region	
Crotch's bumble bee	*Bombus crotchii*	CCE	In region	
Western bumble bee	*Bombus occidentalis*	CCE	Very close	
Longfin smelt	*Spirinchus thaleichthys*	CT	In region	
Delta Smelt	*Hypomesus transpacificus*	FT, CE	In region	
Tidewater goby	*Eucyclogobius newberryi*	FE, SSC	In region	iNat obscured points
California giant salamander	*Dicamptodon ensatus*	SSC	In region	Obscured
Foothill yellow-legged frog	*Rana boylii*	FT, CE	In region	
California red-legged frog	*Rana draytonii*	FT, SSC	In region	iNat obscured points
Green sea turtle	*Chelonia mydas*	FT	In region	
Northwestern pond turtle	*Actinemys marmorata*	FC, SSC	On site	West and SW
San Francisco garter snake	*Thamnophis sirtalis tetrataenia*	FE, CE, CFP	In region	iNat obscured points
Brant	*Branta bernicla*	SSC2	On site	West and NE, along shores
Cackling goose (Aleutian)	*Branta hutchinsii leucopareia*	WL	On site	Generally throughout
Redhead	*Aythya americana*	SSC2	On site	North
Harlequin duck	*Histrionicus histrionicus*	SSC2	Very close	Presidio
Barrow's goldeneye	*Bucephala islandica*	SSC	On site	NW
Short-tailed albatross	*Phoebastria albatrus*	FE, SSC	In region	
Fork-tailed storm petrel		SSC	Very close	North and west shores
Ashy storm-petrel	*Hydrobates homochroa*	BCC, SSC	Very close	Lake Merced
Black storm-petrel	*Hydrobates melania*	SSC, BCC	Very close	NW corner of peninsula
Western grebe	*Aechmophorus occidentalis*	BCC	On site	Throughout

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Clark's grebe	*Aechmophorus clarkii*	BCC	On site	Throughout
Western yellow-billed cuckoo	*Coccyzus americanus occidentalis*	FT, CE	In region	
Black swift	*Cypseloides niger*	SSC3, BCC	On site	Central
Vaux's swift	*Chaetura vauxi*	SSC2	On site	Throughout
Calliope hummingbird	*Selasphorus calliope*	BCC	On site	Central/South
Rufous hummingbird	*Selasphorus rufus*	BCC	On site	Throughout
Allen's hummingbird	*Selasphorus sasin*	BCC	On site	Throughout
Yellow rail	*Coturnicops noveboracensis*	BCC, SSC	In region	
Ridgway's rail (San Francisco Bay)	*Rallus obsoletus obsoletus*	FE, CE, CFP	On site	North
California black rail			In range	
Black oystercatcher	*Haematopus bachmani*	BCC	On site	Throughout, mostly shoreines
Mountain plover	*Charadrius montanus*	SSC2, BCC	Very close	San Francisco Zoo
Snowy plover	*Charadrius nivosus*	BCC	On site	North and west shores, 1 central
Western snowy plover	*Charadrius nivosus nivosus*	FT, SSC	Very close	West along shore
Long-billed curlew	*Numenius americanus*	WL	On site	Throughout
Marbled godwit	*Limosa fedoa*	BCC	On site	Throughout
Black turnstone	*Arenaria melanocephala*	BCC	On site	Mostly along north, west shores
Red knot (Pacific)	*Calidris canutus*	BCC	On site	West along coast
Pectoral sandpiper	*Calidris melanotos*	BCC	Very close	Lake Merced and Presidio
Short-billed dowitcher	*Limnodromus griseus*	BCC	On site	West, North, and central
Wandering tattler	*Tringa incana*	BCC	On site	North and W, mostly shores
Lesser yellowlegs	*Tringa flavipes*	BCC	On site	North /central (Richmond)
Willet	*Tringa semipalmata*	BCC	On site	Throughout
Marbled murrelet	*Brachyramphus marmoratus*	FT, CE	On site	West and N/central (Richmond)
Rhinoceros auklet	*Cerorhinca monocerata*	WL	On site	North and W, along shores
Cassin's auklet	*Ptychoramphus aleuticus*	SSC	Very close	North and W of along shores
Scripps' murrelet	*Synthliboramphus scrippsi*	CT, BCC	Very close	NW of site along shore
Tufted puffin			Very close	West along shore

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Laughing gull	*Leucophaeus atricilla*	WL	Very close	Presidio, West shore, Lake Merced
Franklin's gull	*Leucophaeus pipixcan*	BCC	Very close	West shore, Golden Gate Park, Lake Merced
Heermann's gull	*Larus heermanni*	BCC	On site	Throughout
Western gull	*Larus occidentalis*	BCC	On site	Throughout
California gull	*Larus californicus*	BCC, WL	On site	Throughout
California least tern	*Sternula antillarum browni*	FE, CE, CFP	Very close	North and Lake Merced
Black tern	*Chlidonias niger*	SSC2, BCC	Very close	Golden Gate Park, North and west aspects
Elegant tern	*Thalasseus elegans*	BCC, WL	On site	Throughout
Black skimmer	*Rynchops niger*	BCC, SSC3	On site	North shore
Common loon	*Gavia immer*	SSC	On site	Throughout
Brandt's cormorant	*Urile penicillatus*	BCC	On site	Throughout, mostly along North and west shores
Double-crested cormorant	*Phalacrocorax auritus*	WL	On site	Throughout
American white pelican	*Pelacanus erythrorhynchos*	SSC1	On site	Throughout, mostly North, central
Least bittern	*Ixobrychus exilis*	SSC2	Very close	Golden Gate Park, Lake Merced
White-faced ibis	*Plegadis chihi*	WL	On site	West side
Turkey vulture	*Cathartes aura*	BOP	On site	Throughout
Osprey	*Pandion haliaetus*	WL, BOP	On site	Throughout
White-tailed kite	*Elanus luecurus*	CFP, BOP	On site	Throughout
Golden eagle	*Aquila chrysaetos*	BGEPA, CFP, BOP, WL	On site	Throughout, mostly central
Northern harrier	*Circus cyaneus*	BCC, SSC3, BOP	On site	Throughout
Sharp-shinned hawk	*Accipiter striatus*	WL, BOP	On site	Throughout
Cooper's hawk	*Accipiter cooperii*	WL, BOP	On site	Throughout
American goshawk	*Accipiter atricapillus*	SSC2, BOP	On site	North

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Bald eagle	*Haliaeetus leucocephalus*	CE, BGEPA, BOP	On site	Throughout
Red-shouldered hawk	*Buteo lineatus*	BOP	On site	Throughout
Swainson's hawk	*Buteo swainsoni*	CT, BOP	On site	Throughout
Red-tailed hawk	*Buteo jamaicensis*	BOP	On site	Throughout
Ferruginous hawk	*Buteo regalis*	WL, BOP	On site	Throughout
Rough-legged hawk	*Buteo lagopus*	BOP	On site	Central
American barn owl	*Tyto furcata*	BOP	On site	Throughout
Northern spotted owl	*Strix occidentalis caurina*	FT, CT, BOP	In range	
Western screech-owl	*Megascops kennicotti*	BOP	Very close	Presidio, Golden Gate Park
Great horned owl	*Bubo virginianus*	BOP	On site	Throughout
Burrowing owl	*Athene cunicularia*	BCC, SSC2, BOP, CCE	On site	Throughout
Long-eared owl	*Asio otus*	BCC, SSC3, BOP	In region	
Short-eared owl	*Asia flammeus*	BCC, SSC3, BOP	On site	Central
Northern saw-whet owl	*Aegolius acadicus*	BOP	On site	North
Northern pygmy-owl	*Glaucidium gnoma*	BOP	Very close	Lake Merced
Lewis's woodpecker	*Melanerpes lewis*	BCC	On site	North and central
Nuttall's woodpecker	*Picoides nuttallii*	BCC	On site	Throughout
American kestrel	*Falco sparverius*	BOP	On site	Throughout
Merlin	*Falco columbarius*	WL, BOP	On site	Throughout
Peregrine falcon	*Falco peregrinus*	BOP	On site	Throughout
Prairie falcon	*Falco mexicanus*	WL, BOP	On site	Throughout
Olive-sided flycatcher	*Contopus cooperi*	BCC, SSC2	On site	Throughout
Willow flycatcher	*Empidonax trailii*	CE	On site	Throughout
Vermilion flycatcher	*Pyrocephalus rubinus*	SSC2	On site	North /central (Richmond)
Least Bell's vireo	*Vireo bellii pusillus*	FE, CE	In region	
Loggerhead shrike	*Lanius ludovicianus*	SSC2	Very close	Presidio, Lake Merced, Golden Gate Park, SE of site

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Yellow-billed magpie	*Pica nuttalli*	BCC	On site	Central/South
Oak titmouse	*Baeolophus inornatus*	BCC	On site	North and central
California horned lark	*Eremophila alpestris actia*	WL	On site	North and central
Bank swallow	*Riparia riparia*	CT	On site	Throughout
Purple martin	*Progne subis*	SSC2	On site	Throughout
Wrentit	*Chamaea fasciata*	BCC	On site	Throughout
California thrasher	*Toxostoma redivivum*	BCC	On site	N and central
Cassin's finch	*Haemorhous cassinii*	BCC	On site	N and central
Lawrence's goldfinch	*Spinus lawrencei*	BCC	On site	N and central
Grasshopper sparrow	*Ammodramus savannarum*	SSC2	On site	N and central
Black-chinned sparrow	*Spizella atrogularis*	BCC	In region	
Bell's sparrow	*Amphispiza b. belli*	WL	On site	South
Large-billed savannah sparrow	*Passerculus sandwichensis rostratus*	SSC2	In region	
Yellow-breasted chat	*Icteria virens*	SSC3	On site	Throughout
Yellow-headed blackbird	*Xanthocephalus xanthocephalus*	SSC3	On site	North and central
Bullock's oriole	*Icterus bullockii*	BCC	On site	Throughout
Tricolored blackbird	*Agelaius tricolor*	CT, BCC, SSC1	On site	Throughout
Lucy's warbler	*Leiothlypis luciae*	SSC3	On site	SW and North
Virginia's warbler	*Leiothlypis virginiae*	WL, BCC	On site	Throughout
San Francisco common yellowthroat	*Geothlypis trichas sinuosa*	SSC3, BCC	In range	
Prothonotary warbler	*Protonotaria citrea*	BCC	On site	Central and West
Prairie warbler	*Setophaga discolor*	BCC	On site	Central
Yellow warbler	*Setophaga petechia*	SSC2	On site	Throughout
Hepatic tanager	*Piranga flava*	WL	On site	Central/South
Summer tanager	*Piranga rubra*	SSC1	On site	Throughout
Little brown bat	*Myotis lucifugus*	WBWG: M	In region	
Yuma myotis	*Myotis yumanensis*	WBWG: LM	Very close	In golden gate park

Common name	***Species name***	**Status[1]**	**Occurrence records**	**Locations of On-site and Very-close records**
Long-eared myotis	*Myotis evotis*	WBWG: M	In region	
Fringed myotis	*Myotis thysanodes*	WBWG: H	In range	
Long-legged myotis	*Myotis volans*	WBWG: H	In range	
California myotis	*Myotis californicus*	WBWG:L	Very close	In golden gate park
Canyon bat	*Parastrellus hesperus*	WBWG: M	In range	
Big brown bat	*Episticus fuscus*	WBWG: L	Very close	In golden gate park
Silver-haired bat	*Lasionycteris noctivagans*	WBWG: M	On site	North
Hoary bat	*Lasiurus cinereus*	WBWG: M	Very close	In golden gate park
Western red bat	*Lasiurus blossevillii*	SSC, WBWG: H	Very close	In golden gate park
Townsend's big-eared bat	*Corynorhinus townsendii*	SSC, WBWG: H	In region	
Pallid bat	*Antrozous pallidus*	SSC, WBWG: H	In region	
Mexican free-tailed bat	*Tadarida brasiliensis*	WBWG: L	Very close	Golden Gate Park
San Francisco dusky-footed woodrat	*Neotoma fuscipes annectens*	SSC	In region	
Southern sea otter	*nhydra lutris nereis*	FT, CFP, SSC	In region	
Salt-marsh harvest mouse	*Reithrodontomys raviventris*	FE, CE, CFP	In region	
American badger	*Taxidea taxus*	SSC	Nearby	

[1] Listed on CDFW's Special Animals List (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406) as FT or FE = federal threatened or endangered; FC = federal candidate for listing; BGEPA = Bald and Golden Eagle Protection Act; CT or CE = California threatened or endangered; CCT or CCE = Candidate California threatened or endangered; CFP = California Fully Protected (California Fish and Game Code 3511); SSC = California Species of Special Concern, and SSC1, SSC2 and SSC3 = California Bird Species of Special Concern priorities 1, 2 and 3, respectively); WL = CDFW's Taxa to Watch List; WBWG = Western Bat Working Group with priority rankings, of low (L), moderate (M), and high (H); BCC = U.S. Fish and Wildlife Service's Bird of Conservation Concern (https://www.fws.gov/sites/default/files/documents/birds-of-conservation-concern-2021.pdf); and BOP = protected by Birds of Prey (California Fish and Game Code 3503.5, see https://wildlife.ca.gov/Conservation/Birds/Raptors).

By the time Loss et al. (2014) performed their effort to estimate annual USA bird-window fatalities, many more fatality monitoring studies had been reported or were underway. Loss et al. (2014) incorporated many more fatality rates based on scientific monitoring, and they were more careful about which fatality rates to include. However, they included estimates based on fatality monitoring by homeowners, which in one study were found to detect only 38% of the available window fatalities (Bracey et al. 2016). Loss et al. (2014) excluded all fatality records lacking a dead bird in hand, such as injured birds or feather or blood spots on windows. Loss et al.'s (2014) fatality metric was the number of fatalities per building (where in this context a building can include a house, low-rise, or high-rise structure), but they assumed that this metric was based on window collisions. Because most of the bird-window collision studies were limited to migration seasons, Loss et al. (2014) developed an admittedly assumption-laden correction factor for making annual estimates. Also, only 2 of the studies included adjustments for carcass persistence and searcher detection error, and it was unclear how and to what degree fatality rates were adjusted for these factors. Although Loss et al. (2014) attempted to account for some biases as well as for large sources of uncertainty mostly resulting from an opportunistic rather than systematic sampling data source, their estimated annual fatality rate across the USA was highly uncertain and vulnerable to multiple biases, most of which would have resulted in fatality estimates biased low.

In my review of bird-window collision monitoring, I found that the search radius around homes and buildings was very narrow, usually 2 meters. Based on my experience with bird collisions in other contexts, I would expect that a large portion of bird-window collision victims would end up farther than 2 m from the windows, especially when the windows are higher up on tall buildings. In my experience, searcher detection rates tend to be low for small birds deposited on ground with vegetation cover or woodchips or other types of organic matter. Also, vertebrate scavengers entrain on anthropogenic sources of mortality and quickly remove many of the carcasses, thereby preventing the fatality searcher from detecting these fatalities. Adjusting fatality rates for these factors – search radius bias, searcher detection error, and carcass persistence rates – would greatly increase nationwide estimates of bird-window collision fatalities.

Buildings can intercept many nocturnal migrants as well as birds flying in daylight. As mentioned above, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a four-story glass walkway at Washington State University (no adjustments attempted for undetected fatalities). Somerlot (2003) found 21 bird fatalities among 13 buildings on a university campus within only 61 days. Monitoring twice per week, Hager at al. (2008) found 215 bird fatalities of 48 species, or 55 birds/building/year, and at another site they found 142 bird fatalities of 37 species for 24 birds/building/year. Gelb and Delacretaz (2009) recorded 5,400 bird fatalities under buildings in New York City, based on a decade of monitoring only during migration periods, and some of the high-rises were associated with hundreds of fatalities each. Klem et al. (2009) monitored 73 building façades in New York City during 114 days of two migratory periods, tallying 549 collision victims, nearly 5 birds per day. Borden et al. (2010) surveyed a 1.8 km route 3 times per week during 12-month period and found 271 bird fatalities of 50 species. Parkins et al. (2015) found 35 bird fatalities of 16 species within only 45 days of monitoring under 4 building façades. From

24 days of survey over a 48-day span, Porter and Huang (2015) found 47 fatalities under 8 buildings on a university campus. Sabo et al. (2016) found 27 bird fatalities over 61 days of searches under 31 windows. In San Francisco, Kahle et al. (2016) found 355 collision victims within 1,762 days under a 5-story building. Ocampo-Peñuela et al. (2016) searched the perimeters of 6 buildings on a university campus, finding 86 fatalities after 63 days of surveys. One of these buildings produced 61 of the 86 fatalities, and another building with collision-deterrent glass caused only 2 of the fatalities, thereby indicating a wide range in impacts likely influenced by various factors. There is ample evidence available to support my prediction that the proposed project would result in many collision fatalities of birds.

Project Impact Prediction

By the time of these comments, I had reviewed and processed results of bird collision monitoring at 213 buildings and façades for which bird collisions per m^2 of glass per year could be calculated and averaged (Johnson and Hudson 1976, O'Connell 2001, Somerlot 2003, Hager et al. 2008, Borden et al. 2010, Hager et al. 2013, Porter and Huang 2015, Parkins et al. 2015, Kahle et al. 2016, Ocampo-Peñuela et al. 2016, Sabo et al. 2016, Barton et al. 2017, Gomez-Moreno et al. 2018, Schneider et al. 2018, Loss et al. 2019, Brown et al. 2020, City of Portland Bureau of Environmental Services and Portland Audubon 2020, Riding et al. 2020). These study results averaged 0.073 bird deaths per m^2 of glass per year (95% CI: 0.042-0.102). This average and its 95% confidence interval provide a robust basis for predicting fatality rates at a proposed new project.

The Addendum includes an increase of 4,000 residential units. The floorspace per residential unit of condominiums, townhouses and apartments among the projects I have reviewed as an expert have averaged 1,296.3 square feet per unit. The average square footage of the apartments that contributed to this average was consistent with the floorspace reported in the Addendum as an example 590-foot-tall apartment building in the project, which itself would average 949 sf per unit with 60,700 sf of retail space. I estimate the total square footage of 4,000 residential units would be 5,185,251 sf.

Among the 45 residential projects I have reviewed as an expert and for which I was able to measure the extent of structural glass on proposed building facades depicted in renderings provided in the environmental review documents, I measured an average 0.01872 (95% confidence interval: 0.00989–0.02754) m^2 per square foot of floorspace. This rate multiplied by the total square footage of 4,000 additional residential units would predict 97,060 (95% CI: 51,300–142,821) m^2 of additional structural glass on the facades of new buildings in the City. The mean window area multiplied against the mean collision mortality measured across North America predicts 7,095 (aggregate[1] 95% CI: 2,226–14,82) bird fatalities per year. More than seven thousand additional fatalities per

[1] What I mean by aggregate CI is that the lower bound estimate of the window area is multiplied by the lower bound estimate of collision mortality, and the upper bound estimate of the window area is multiplied by the upper bound estimate of collision mortality.

year above the level that would be expected under the 2022 plan would be a substantial number, and it should easily qualify as a highly significant impact.

Nearly all predicted deaths would be of birds protected under the Migratory Bird Treaty Act and under the California Migratory Bird Protection Act, thus causing significant impacts. Given the predicted level of bird-window collision mortality, it is my opinion that the proposed project would result in potentially significant adverse biological impacts, including the unmitigated take of aerial habitats of birds, bats and other volant wildlife. Not only would the project take habitat of rare and sensitive species of birds, but it would transform the building's airspace into a lethal collision trap to birds.

SPATIAL DISTRIBUTION OF PREDICTED AVIAN COLLISION MORTALITY

San Francisco is situated within the Pacific Flyway, which is one of the most intensely used bird migration pathways in the world. It is also known that birds migrate along the coast and across Hawk Hill and the Marin Headlands, many headed to or from the Altamont Pass where I spent thousands of hours observing migrants during both day and night over about 20 years. Between Hawk Hill and the Altamont Pass is San Francisco, which must be visited by many thousands of migrating birds. Knowing which species of birds and how many birds move across San Francisco, and knowing specific flight paths that are disproportionately used by season would be useful for predicting where increases in building heights would pose greater risks to birds. Unfortunately, the data on bird movement through San Francisco are sparse.

There *are* data on bird species richness. Golden Gate Audubon Society ("GGAS") (2020), tallied 47 species of birds on Mount Sutro Open Space Reserve in about 54 hours of surveys between 16 March and 29 December 2019. On the same Reserve on 20 August 2020, I detected 23 species of birds over a much shorter time, but a model I fit to my data predicts that I would have detected the same number of bird species as GGAS (2020) had I surveyed for 11 hours and 40 minutes, and that I would have detected 117 species of birds had I surveyed for 54 hours (Figure 1).

I repeated my survey on Mount Sutro Open Space Reserve on 16 July 2021, and I implemented the same survey methods such as start time, duration, and survey route. The second survey yielded even more species detections and at a faster rate (red circles in Figure 2). Between both surveys I detected 37 species of birds, but adding the results of GGAS (2021) brings the total number of bird species to 71. With additional surveys, this number would surely increase. The evidence is that many birds find and use aerohabitat in San Francisco.

Kahle et al. (2016) detected 40 species of birds at the California Academy of Sciences building in Golden Gatee Park (Table 2). More importantly, members of 34 (85%) of these species were also recorded as window collision fatalities, and members of 37 (93%) of these species appear in the scientific literature as window collision fatalities. Killed disproportionately relative to their observed abundances were special-status species such as Allen's hummingbird and yellow warbler (Figure 3). Both these species are found in abundance in San Francisco (Photo 1).

Figure 1. *Cumulative number of bird species detected as a power function of the number of minutes devoted to the survey. The model explained 98% of the variation, with a root mean square error of 17.71. Had I been able to commit more time to the survey, I am confident a different model would have better fit the resulting data – a model more expressive of an asymptote.*

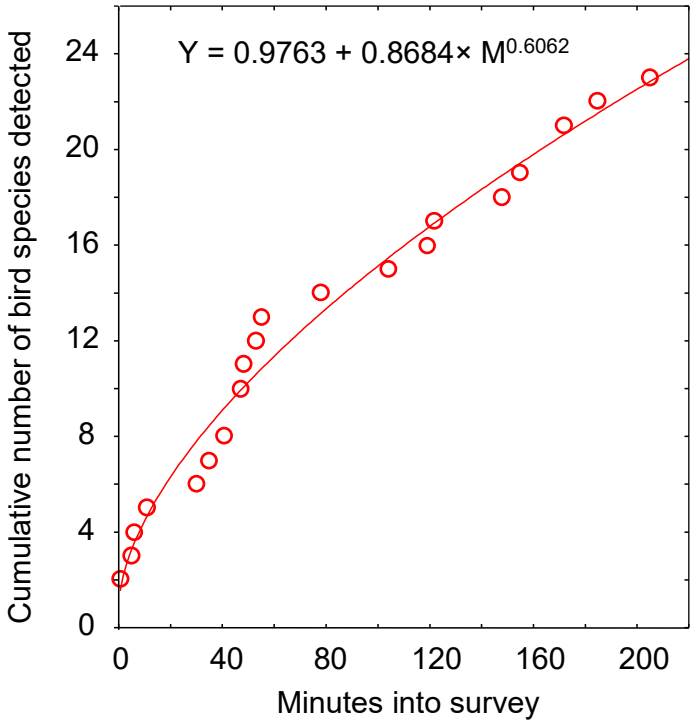

Figure 2. *Actual and predicted relationships between the number of vertebrate wildlife species (all but 2 were birds) detected and the elapsed survey time based on my visual-scan surveys on 20 August 2020 and 16 July 2021.*

$$Y_{2020} = \frac{1}{0.001559 + 0.935847(X+1)^{-0.580731}}$$

$$Y_{2021} = \frac{1}{0.0016586 + 0.459981(X+1)^{-0.543857}}$$

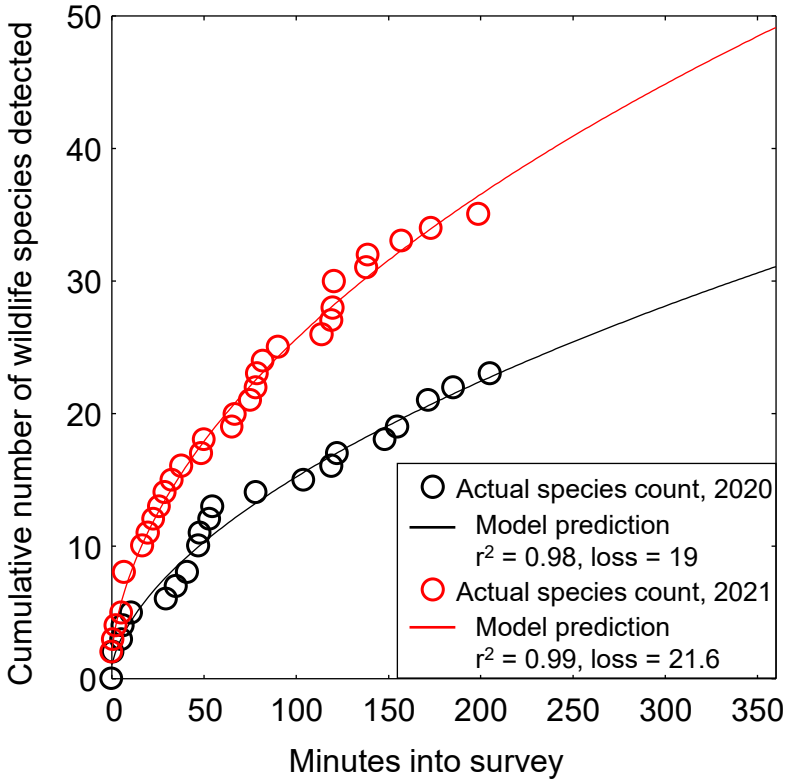

Table 2. *Species observed on site or reported as window-collision victims at the California Academy of Sciences (CAS) buildings (Kahle et al. 2016).*

Species	Scientific name	Status[1]	Number counted at CAS study		Known window deaths in North America
			As window deaths	Alive in survey plots	
Western gull	*Larus occidentalis*	BCC		4	
Red-tailed hawk	*Buteo jamaicensis*	BOP		1	Yes
Red-shouldered hawk	*Buteo lineatus*	BOP		1	Yes
Mourning dove	*Zenaida macroura*		6	3	Yes
Great-horned owl	*Bubo virginianus*	BOP		1	Yes
Anna's hummingbird	*Calypte anna*		131	256	Yes
Allen's hummingbird	*Selasphorus sasin*	BCC	37	29	Yes
Costa's hummingbird	*Calypte costae*	BCC	1	0	Yes
Rufous hummingbird	*Selasphorus rufus*	BCC	4	0	Yes
Nuttall's woodpecker	*Picoides nuttallii*	BCC		13	
Pacific-slope flycatcher	*Empidonax difficilis*		1	5	Yes
Black phoebe	*Sayornis nigricans*		3	34	Yes
Chestnut-backed chickadee	*Poecile rufescens*		1	203	Yes
Bushtit	*Psaltriparus minimus*		1	399	Yes
Brown creeper	*Certhia americana*		1	52	Yes
Pygmy nuthatch	*Sitta pygmaea*		1	242	Yes
Swainson's thrush	*Catharus ustulatus*		1	1	Yes
Hermit thrush	*Catharus guttatus*		8	82	Yes
American robin	*Turdus vulvaris*		3	389	Yes
Warbling vireo	*Vireo gilvus*		1	5	Yes
Yellow-rumped warbler	*Setophaga coronata*		7	92	Yes
Orange-crowned warbler	*Oreothlypis celata*		2	29	Yes
Townsend's warbler	*Setophaga townsendi*		3	101	Yes
Wilson's warbler	*Cardellina pusilla*		3	11	Yes
Yellow warbler	*Setophaga petechia*	SSC2, BCC	7	18	Yes
San Francisco common yellowthroat	*Geothlypis trichas sinuosa*	SSC3, BCC	3	0	Yes
Song sparrow	*Melospiza melodia*		5	435	Yes
Golden-crowned sparrow	*Zonotrichia atricapilla*		3	230	Yes
White-crowned sparrow	*Zonotrichia leucophrys*		1	249	Yes
Savannah sparrow	*Passerculus sandwichensis*		2	0	Yes
Lincoln's sparrow	*Melospiza lincolnii*		3	35	Yes
Fox sparrow	*Passerella iliaca*		6	152	Yes

Species	Scientific name	Status[1]	Number counted at CAS study		Known window deaths in North America
			As window deaths	Alive in survey plots	
Dark-eyed junco	*Junco hyemalis*		22	510	Yes
California towhee	*Melozone crissalis*		1	92	Yes
Brown-headed cowbird	*Molothrus ater*		1	39	Yes
Red-winged blackbird	*Agelaius phoeniceus*		1	261	Yes
Brewer's blackbird	*Euphagus cyanocephalus*		25	1027	Yes
Tricolored blackbird	*Agelaius tricolor*	CT, BCC		15	
House finch	*Haemorhous mexicanus*		5	213	Yes
Lesser goldfinch	*Spinus psaltria*		1	44	Yes

[1] Listed as BCC = U.S. Fish and Wildlife Service Bird Species of Conservation Concern, CT = California threatened, BOP = California Fish and Game Code 3503.5 (Birds of Prey), and SSC1, SSC2 and SSC3 = California Bird Species of Special Concern priorities 1, 2 and 3, respectively.

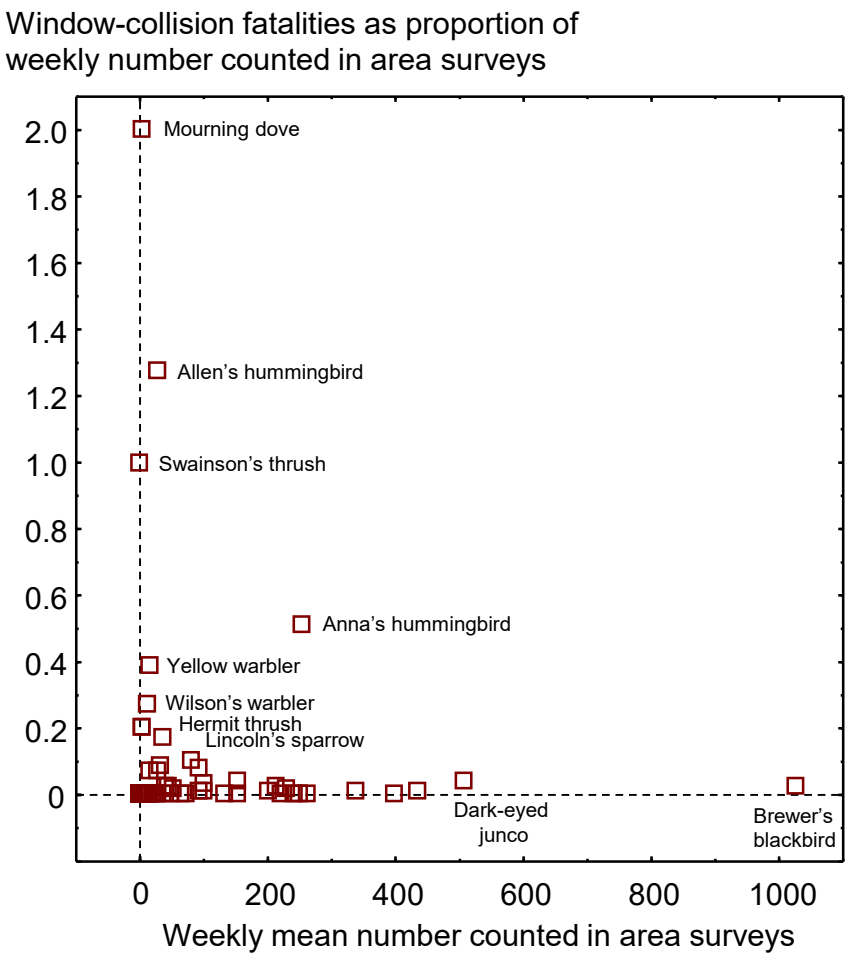

Figure 3. *Window collision fatalities as a proportion of those observed in visual-scan surveys at the California Academy of Sciences building (data from Kahle et al. 2016).*

Photo 1. *Allen's hummingbird in Mount Sutro Open Space Reserve, 16 July 2021. As found at the nearby California Academy of Sciences Building, this species is highly vulnerable to window collision mortality (Kahle et al. 2016).*

What is needed is a study of bird movement through San Francisco. Needed are data on species occurrences, numbers of birds, heights above ground, flight direction, specific behaviors and timing of flights across the City. These same types of data were collected in the nearby Altamont Pass Wind Resource Area to acquire an understanding of bird flight traffic for the purposed of guiding the sitings of new wind turbines as part of repowering (Smallwood 2017, Smallwood et al. 2017). The data could be acquired by performing periodic surveys from stations established systematically or randomly across the City, covering all times of day and night (using thermal imaging cameras) and lasting at least one year to characterize seasonality of bird movement. Based on such data, the City could more carefully plan the vertical and lateral outlay of new buildings to minimize the encounter frequencies of birds with buildings. This is important because the existing Bird-Safe Building Guidelines can accomplish only so much, and the efficacy of these Guidelines remains unmeasured and unknown. Therefore, what is also needed is a program to measure the efficacy of the Guidelines by designing an experiment to search for and count bird-window collision victims along with the implementation of carcass detection trials. The San Francisco guidelines should have also covered scientific monitoring of impacts as well as compensatory mitigation for impacts that could not be avoided, minimized or reduced. Until these types of bird movement data are in hand, the City can only speculate as to the magnitude of bird-window collision mortality and whether the mortality can be minimized or reduced via Bird-Safe Building Guidelines.

In the face of such a large increase in the number of residential units, as well as a major shift in the lateral and vertical layout of 54,000 residential units, another need is for an update in the Bird-Safe Building Guidelines (San Francisco Planning Department 2011). Much has been learned about causal factors and mitigation solutions (e.g., Sheppard and Phillips 2015). The American Bird Conservancy (ABC) produced an excellent set of

guidelines recommending actions to: (1) Minimize use of glass; (2) Placing glass behind some type of screening (grilles, shutters, exterior shades); (3) Using glass with inherent properties to reduce collisions, such as patterns, window films, decals or tape; and (4) Turning off lights during migration seasons (Sheppard and Phillips 2015).

New research results inform of the efficacy of marking windows. Whereas Klem (1990) found no deterrent effect from decals on windows, Johnson and Hudson (1976) reported a fatality reduction of about 69% after placing decals on windows. In an experiment of opportunity, Ocampo-Peñuela et al. (2016) found only 2 of 86 fatalities at one of 6 buildings – the only building with windows treated with a bird deterrent film. At the building with fritted glass, bird collisions were 82% lower than at other buildings with untreated windows. Kahle et al. (2016) added external window shades to some windowed façades to reduce fatalities 82% and 95%. Brown et al. (2020) reported an 84% lower collision probability among fritted glass windows and windows treated with ORNILUX R UV. City of Portland Bureau of Environmental Services and Portland Audubon (2020) reduced bird collision fatalities 94% by affixing marked Solyx window film to existing glass panels of Portland's Columbia Building. Many external and internal glass markers have been tested experimentally, some showing no effect and some showing strong deterrent effects (Klem 1989, 1990, 2009, 2011; Klem and Saenger 2013; Rössler et al. 2015).

Van Doren et al. (2021) found that nocturnal migrants contributed most of the collision fatalities in their study, and the largest predictors of fatalities were peak migration and lit windows. Van Doren et al. (2021) predicted that a light-out mitigation measure could reduce bird-window collision mortality by 60%.

Monitoring and the use of compensatory mitigation should be incorporated at any new building project because the measures recommended in the available guidelines remain of uncertain efficacy, and even if these measures are effective, they will not reduce collision fatalities to zero. The only way to assess mitigation efficacy and to quantify post-construction fatalities is to monitor the project for fatalities.

The Addendum (p. 49) concludes, "In summary, the proposed rezoning program would not result in new significant biological resources impacts that were not previously identified in the FEIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures or changes to existing mitigation measures are required." However, the FEIR did not identify the loss of aerohabitat of birds and bats as any sort of project impact, and neither does the Addendum. Furthermore, the FEIR did not identify as an impact my predicted mean mortality of 7,095 birds per year just from the additional 4,000 residential units, and an upper bound CI prediction of 14,082 birds per year.

Thank you for your consideration,

Shawn Smallwood, Ph.D.

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Kenneth Shawn Smallwood
Curriculum Vitae

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Born May 3, 1963 in
Sacramento, California.
Married, father of two.

Ecologist

Expertise

- Finding solutions to controversial problems related to wildlife interactions with human industry, infrastructure, and activities;
- Wildlife monitoring and field study using GPS, thermal imaging, behavior surveys;
- Using systems analysis and experimental design principles to identify meaningful ecological patterns that inform management decisions.

Education

Ph.D. Ecology, University of California, Davis. September 1990.
M.S. Ecology, University of California, Davis. June 1987.
B.S. Anthropology, University of California, Davis. June 1985.
Corcoran High School, Corcoran, California. June 1981.

Experience

- 762 professional reports, including:
- 90 peer reviewed publications
- 24 in non-reviewed proceedings
- 646 reports, declarations, posters and book reviews
- 8 in mass media outlets
- 92 public presentations of research results

Editing for scientific journals: Guest Editor, *Wildlife Society Bulletin*, 2012-2013, of invited papers representing international views on the impacts of wind energy on wildlife and how to mitigate the impacts. Associate Editor, *Journal of Wildlife Management*, March 2004 to 30 June 2007. Editorial Board Member, *Environmental Management*, 10/1999 to 8/2004. Associate Editor, *Biological Conservation*, 9/1994 to 9/1995.

Member, Alameda County Scientific Review Committee (SRC), August 2006 to April 2011. The five-member committee investigated causes of bird and bat collisions in the Altamont Pass Wind Resource Area, and recommended mitigation and monitoring measures. The SRC reviewed the science underlying the Alameda County Avian Protection Program, and advised

the County on how to reduce wildlife fatalities.

Consulting Ecologist, 2004-2007, California Energy Commission (CEC). Provided consulting services as needed to the CEC on renewable energy impacts, monitoring and research, and produced several reports. Also collaborated with Lawrence-Livermore National Lab on research to understand and reduce wind turbine impacts on wildlife.

Consulting Ecologist, 1999-2013, U.S. Navy. Performed endangered species surveys, hazardous waste site monitoring, and habitat restoration for the endangered San Joaquin kangaroo rat, California tiger salamander, California red-legged frog, California clapper rail, western burrowing owl, salt marsh harvest mouse, and other species at Naval Air Station Lemoore; Naval Weapons Station, Seal Beach, Detachment Concord; Naval Security Group Activity, Skaggs Island; National Radio Transmitter Facility, Dixon; and, Naval Outlying Landing Field Imperial Beach.

Part-time Lecturer, 1998-2005, California State University, Sacramento. Instructed Mammalogy, Behavioral Ecology, and Ornithology Lab, Contemporary Environmental Issues, Natural Resources Conservation.

Senior Ecologist, 1999-2005, BioResource Consultants. Designed and implemented research and monitoring studies related to avian fatalities at wind turbines, avian electrocutions on electric distribution poles across California, and avian fatalities at transmission lines.

Chairman, Conservation Affairs Committee, The Wildlife Society--Western Section, 1999-2001. Prepared position statements and led efforts directed toward conservation issues, including travel to Washington, D.C. to lobby Congress for more wildlife conservation funding.

Systems Ecologist, 1995-2000, Institute for Sustainable Development. Headed ISD's program on integrated resources management. Developed indicators of ecological integrity for large areas, using remotely sensed data, local community involvement and GIS.

Associate, 1997-1998, Department of Agronomy and Range Science, University of California, Davis. Worked with Shu Geng and Mingua Zhang on several studies related to wildlife interactions with agriculture and patterns of fertilizer and pesticide residues in groundwater across a large landscape.

Lead Scientist, 1996-1999, National Endangered Species Network. Informed academic scientists and environmental activists about emerging issues regarding the Endangered Species Act and other environmental laws. Testified at public hearings on endangered species issues.

Ecologist, 1997-1998, Western Foundation of Vertebrate Zoology. Conducted field research to determine the impact of past mercury mining on the status of California red-legged frogs in Santa Clara County, California.

Senior Systems Ecologist, 1994-1995, EIP Associates, Sacramento, California. Provided consulting services in environmental planning, and quantitative assessment of land units for their conservation and restoration opportunities basedon ecological resource requirements of 29 special-status species. Developed ecological indicators for prioritizing areas within Yolo County

to receive mitigation funds for habitat easements and restoration.

Post-Graduate Researcher, 1990-1994, Department of Agronomy and Range Science, *U.C. Davis*. Under Dr. Shu Geng's mentorship, studied landscape and management effects on temporal and spatial patterns of abundance among pocket gophers and species of Falconiformes and Carnivora in the Sacramento Valley. Managed and analyzed a data base of energy use in California agriculture. Assisted with landscape (GIS) study of groundwater contamination across Tulare County, California.

Work experience in graduate school: Co-taught Conservation Biology with Dr. Christine Schonewald, 1991 & 1993, UC Davis Graduate Group in Ecology; Reader for Dr. Richard Coss's course on Psychobiology in 1990, UC Davis Department of Psychology; Research Assistant to Dr. Walter E. Howard, 1988-1990, UC Davis Department of Wildlife and Fisheries Biology, testing durable baits for pocket gopher management in forest clearcuts; Research Assistant to Dr. Terrell P. Salmon, 1987-1988, UC Wildlife Extension, Department of Wildlife and Fisheries Biology, developing empirical models of mammal and bird invasions in North America, and a rating system for priority research and control of exotic species based on economic, environmental and human health hazards in California. Student Assistant to Dr. E. Lee Fitzhugh, 1985-1987, UC Cooperative Extension, Department of Wildlife and Fisheries Biology, developing and implementing statewide mountain lion track count for long-term monitoring.

Fulbright Research Fellow, Indonesia, 1988. Tested use of new sampling methods for numerical monitoring of Sumatran tiger and six other species of endemic felids, and evaluated methods used by other researchers.

Projects

Repowering wind energy projects through careful siting of new wind turbines using map-based collision hazard models to minimize impacts to volant wildlife. Funded by wind companies (principally NextEra Renewable Energy, Inc.), California Energy Commission and East Bay Regional Park District, I have collaborated with a GIS analyst and managed a crew of five field biologists performing golden eagle behavior surveys and nocturnal surveys on bats and owls. The goal is to quantify flight patterns for development of predictive models to more carefully site new wind turbines in repowering projects. Focused behavior surveys began May 2012 and continue. Collision hazard models have been prepared for seven wind projects, three of which were built. Planning for additional repowering projects is underway.

Test avian safety of new mixer-ejector wind turbine (MEWT). Designed and implemented a before-after, control-impact experimental design to test the avian safety of a new, shrouded wind turbine developed by Ogin Inc. (formerly known as FloDesign Wind Turbine Corporation). Supported by a $718,000 grant from the California Energy Commission's Public Interest Energy Research program and a 20% match share contribution from Ogin, I managed a crew of seven field biologists who performed periodic fatality searches and behavior surveys, carcass detection trials, nocturnal behavior surveys using a thermal camera, and spatial analyses with the collaboration of a GIS analyst. Field work began 1 April 2012 and ended 30 March 2015 without Ogin installing its MEWTs, but we still achieved multiple important scientific advances.

Reduce avian mortality due to wind turbines at Altamont Pass. Studied wildlife impacts caused by 5,400 wind turbines at the world's most notorious wind resource area. Studied how impacts are perceived by monitoring and how they are affected by terrain, wind patterns, food resources, range management practices, wind turbine operations, seasonal patterns, population cycles, infrastructure management such as electric distribution, animal behavior and social interactions.

Reduce avian mortality on electric distribution poles. Directed research toward reducing bird electrocutions on electric distribution poles, 2000-2007. Oversaw 5 founds of fatality searches at 10,000 poles from Orange County to Glenn County, California, and produced two large reports.

Cook *et al*. v. Rockwell International *et al*., No. 90-K-181 (D. Colorado). Provided expert testimony on the role of burrowing animals in affecting the fate of buried and surface-deposited radioactive and hazardous chemical wastes at the Rocky Flats Plant, Colorado. Provided expert reports based on four site visits and an extensive document review of burrowing animals. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals. I testified in federal court in November 2005, and my clients were subsequently awarded a $553,000,000 judgment by a jury. After appeals the award was increased to two billion dollars.

Hanford Nuclear Reservation Litigation. Provided expert testimony on the role of burrowing animals in affecting the fate of buried radioactive wastes at the Hanford Nuclear Reservation, Washington. Provided three expert reports based on three site visits and extensive document review. Predicted and verified a certain population density of pocket gophers on buried waste structures, as well as incidence of radionuclide contamination in body tissue. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals.

Expert testimony and declarations on proposed residential and commercial developments, gas-fired power plants, wind, solar and geothermal projects, water transfers and water transfer delivery systems, endangered species recovery plans, Habitat Conservation Plans and Natural Communities Conservation Programs. Testified before multiple government agencies, Tribunals, Boards of Supervisors and City Councils, and participated with press conferences and depositions. Prepared expert witness reports and court declarations, which are summarized under Reports (below).

Protocol-level surveys for special-status species. Used California Department of Fish and Wildlife and US Fish and Wildlife Service protocols to search for California red-legged frog, California tiger salamander, arroyo southwestern toad, blunt-nosed leopard lizard, western pond turtle, giant kangaroo rat, San Joaquin kangaroo rat, San Joaquin kit fox, western burrowing owl, Swainson's hawk, Valley elderberry longhorn beetle and other special-status species.

Conservation of San Joaquin kangaroo rat. Performed research to identify factors responsible for the decline of this endangered species at Lemoore Naval Air Station, 2000-2013, and implemented habitat enhancements designed to reverse the trend and expand the population.

Impact of West Nile Virus on yellow-billed magpies. Funded by Sacramento-Yolo Mosquito and Vector Control District, 2005-2008, compared survey results pre- and post-West Nile Virus epidemic for multiple bird species in the Sacramento Valley, particularly on yellow-billed magpie and American crow due to susceptibility to WNV.

Workshops on HCPs. Assisted Dr. Michael Morrison with organizing and conducting a 2-day workshop on Habitat Conservation Plans, sponsored by Southern California Edison, and another 1-day workshop sponsored by PG&E. These Workshops were attended by academics, attorneys, and consultants with HCP experience. We guest-edited a Proceedings published in Environmental Management.

Mapping of biological resources along Highways 101, 46 and 41. Used GPS and GIS to delineate vegetation complexes and locations of special-status species along 26 miles of highway in San Luis Obispo County, 14 miles of highway and roadway in Monterey County, and in a large area north of Fresno, including within reclaimed gravel mining pits.

GPS mapping and monitoring at restoration sites and at Caltrans mitigation sites. Monitored the success of elderberry shrubs at one location, the success of willows at another location, and the response of wildlife to the succession of vegetation at both sites. Also used GPS to monitor the response of fossorial animals to yellow star-thistle eradication and natural grassland restoration efforts at Bear Valley in Colusa County and at the decommissioned Mather Air Force Base in Sacramento County.

Mercury effects on Red-legged Frog. Assisted Dr. Michael Morrison and US Fish and Wildlife Service in assessing the possible impacts of historical mercury mining on the federally listed California red-legged frog in Santa Clara County. Also measured habitat variables in streams.

Opposition to proposed No Surprises rule. Wrote a white paper and summary letter explaining scientific grounds for opposing the incidental take permit (ITP) rules providing ITP applicants and holders with general assurances they will be free of compliance with the Endangered Species Act once they adhere to the terms of a "properly functioning HCP." Submitted 188 signatures of scientists and environmental professionals concerned about No Surprises rule US Fish and Wildlife Service, National Marine Fisheries Service, all US Senators.

Natomas Basin Habitat Conservation Plan alternative. Designed narrow channel marsh to increase the likelihood of survival and recovery in the wild of giant garter snake, Swainson's hawk and Valley Elderberry Longhorn Beetle. The design included replication and interspersion of treatments for experimental testing of critical habitat elements. I provided a report to Northern Territories, Inc.

Assessments of agricultural production system and environmental technology transfer to China. Twice visited China and interviewed scientists, industrialists, agriculturalists, and the Directors of the Chinese Environmental Protection Agency and the Department of Agriculture to assess the need and possible pathways for environmental clean-up technologies and trade opportunities between the US and China.

Yolo County Habitat Conservation Plan. Conducted landscape ecology study of Yolo County to spatially prioritize allocation of mitigation efforts to improve ecosystem functionality within the County from the perspective of 29 special-status species of wildlife and plants. Used a hierarchically structured indicators approach to apply principles of landscape and ecosystem ecology, conservation biology, and local values in rating land units. Derived GIS maps to help guide the conservation area design, and then developed implementation strategies.

Mountain lion track count. Developed and conducted a carnivore monitoring program throughout California since 1985. Species counted include mountain lion, bobcat, black bear, coyote, red and gray fox, raccoon, striped skunk, badger, and black-tailed deer. Vegetation and land use are also monitored. Track survey transect was established on dusty, dirt roads within randomly selected quadrats.

Sumatran tiger and other felids. Upon award of Fulbright Research Fellowship, I designed and initiated track counts for seven species of wild cats in Sumatra, including Sumatran tiger, fishing cat, and golden cat. Spent four months on Sumatra and Java in 1988, and learned Bahasa Indonesia, the official Indonesian language.

Wildlife in agriculture. Beginning as post-graduate research, I studied pocket gophers and other wildlife in 40 alfalfa fields throughout the Sacramento Valley, and I surveyed for wildlife along a 200 mile road transect since 1989 with a hiatus of 1996-2004. The data are analyzed using GIS and methods from landscape ecology, and the results published and presented orally to farming groups in California and elsewhere. I also conducted the first study of wildlife in cover crops used on vineyards and orchards.

Agricultural energy use and Tulare County groundwater study. Developed and analyzed a data base of energy use in California agriculture, and collaborated on a landscape (GIS) study of groundwater contamination across Tulare County, California.

Pocket gopher damage in forest clear-cuts. Developed gopher sampling methods and tested various poison baits and baiting regimes in the largest-ever field study of pocket gopher management in forest plantations, involving 68 research plots in 55 clear-cuts among 6 National Forests in northern California.

Risk assessment of exotic species in North America. Developed empirical models of mammal and bird species invasions in North America, as well as a rating system for assigning priority research and control to exotic species in California, based on economic, environmental, and human health hazards.

Peer Reviewed Publications

Smallwood, K. S. 2022. Utility-scale solar impacts to volant wildlife. Journal of Wildlife Management: e22216. https://doi.org/10.1002/jwmg.22216

Smallwood, K. S., and N. L. Smallwood. 2021. Breeding Density and Collision Mortality of Loggerhead Shrike (*Lanius ludovicianus*) in the Altamont Pass Wind Resource Area. Diversity 13, 540. https://doi.org/10.3390/d13110540.

Smallwood, K. S. 2020. USA wind energy-caused bat fatalities increase with shorter fatality search intervals. Diversity 12(98); https://doi.org/10.3390/d12030098

Smallwood, K. S., D. A. Bell, and S. Standish. 2020. Dogs detect larger wind energy impacts on bats and birds. Journal of Wildlife Management 84:852-864. DOI: 10.1002/jwmg.21863.

Smallwood, K. S., and D. A. Bell. 2020. Relating bat passage rates to wind turbine fatalities.

Diversity 12(84); doi:10.3390/d12020084.

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Kitano, M., M. Ino, K. S. Smallwood, and S. Shiraki. 2020. Seasonal difference in carcass persistence rates at wind farms with snow, Hokkaido, Japan. Ornithological Science 19: 63 – 71.

Smallwood, K. S. and M. L. Morrison. 2018. Nest-site selection in a high-density colony of burrowing owls. Journal of Raptor Research 52:454-470.

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May, R., Gill, A. B., Köppel, J. Langston, R. H.W., Reichenbach, M., Scheidat, M., Smallwood, S., Voigt, C. C., Hüppop, O., and Portman, M. 2017. Future research directions to reconcile wind turbine–wildlife interactions. Pages 255-276 in Köppel, J., Editor, Wind Energy and Wildlife Impacts: Proceedings from the CWW2015 Conference. Springer. Cham, Switzerland.

Smallwood, K. S. 2017. Monitoring birds. M. Perrow, Ed., Wildlife and Wind Farms - Conflicts and Solutions, Volume 2. Pelagic Publishing, Exeter, United Kingdom. www.bit.ly/2v3cR9Q

Smallwood, K. S., L. Neher, and D. A. Bell. 2017. Turbine siting for raptors: an example from Repowering of the Altamont Pass Wind Resource Area. M. Perrow, Ed., Wildlife and Wind Farms - Conflicts and Solutions, Volume 2. Pelagic Publishing, Exeter, United Kingdom. www.bit.ly/2v3cR9Q

Johnson, D. H., S. R. Loss, K. S. Smallwood, W. P. Erickson. 2016. Avian fatalities at wind energy facilities in North America: A comparison of recent approaches. Human–Wildlife Interactions 10(1):7-18.

Sadar, M. J., D. S.-M. Guzman, A. Mete, J. Foley, N. Stephenson, K. H. Rogers, C. Grosset, K. S. Smallwood, J. Shipman, A. Wells, S. D. White, D. A. Bell, and M. G. Hawkins. 2015. Mange Caused by a novel Micnemidocoptes mite in a Golden Eagle (*Aquila chrysaetos*). Journal of Avian Medicine and Surgery 29(3):231-237.

Smallwood, K. S. 2015. Habitat fragmentation and corridors. Pages 84-101 in M. L. Morrison and H. A. Mathewson, Eds., Wildlife habitat conservation: concepts, challenges, and solutions. John Hopkins University Press, Baltimore, Maryland, USA.

EXHIBIT D

FASTCAST

Deborah Holley

Cc/ Richard Drurey

December 1, 2025

PRELIMINARY SHADOW ANALYSIS: **PROPOSED FAMILY ZONING 2025**, JOE DIMAGGIO PLAYGROUND, SAN FRANCISCO

Fastcast is hereby submitting the results of a **programmatic shadow analysis** prepared for the proposed **Family Zoning Plan**. This analysis is intended to quantify the **generalized potential change in shadow on Joe DiMaggio Playground** under a scenario in which the proposed height increases on surrounding parcels are fully utilized.

As part of the methodology, **City building footprint data** was used to define both the **existing zoning height extrusions** and the **Family Zoning Plan height extrusions** using the **same building footprints**. In this area, the **existing zoning envelope** (**generally 40 feet in height**) is treated as an **existing shadow-casting condition**, and the Family Zoning scenario adds only the **incremental height above this existing zoning envelope**. The **proposed shadows are therefore based solely on the height increase introduced by the Family Zoning Plan**, and **net new shadow** on Joe DiMaggio Playground is calculated only for this **incremental zoning height increase**.

The analysis applies **methodologies and data models consistent with San Francisco Planning Department and Planning Code Section 295 (“Shadow Ordinance”) standards and procedures**, as outlined in the July 2014 memorandum *“Shadow Analysis Procedures and Scope Requirements”* and as refined by subsequent written directives issued by the San Francisco Planning Department.

I. INTRODUCTION

This memorandum documents **preliminary quantitative shadow results** for **Joe DiMaggio Playground** associated with proposed height increases under the **San Francisco Family Zoning Plan** (**FZP**) in the North Beach area.

The purpose is to:

1. Summarize the **Family Zoning Plan objectives**,
2. Describe the **objective of the shadow analysis** for Joe DiMaggio Playground, and
3. Present a **neutral, scientific summary** of the **net new shadow** on the playground and the **times of day/season** when this potential shadow increase overlaps with typical playground activities.

No conclusions are offered regarding policy, compliance, or adequacy; this memo is limited to **description and quantification**.

II. FAMILY ZONING PLAN – CONTEXT & OBJECTIVES

According to the **Family Zoning Plan "Five Fast Facts"** document:

- The Plan is intended to create capacity for **over 36,000 homes** on San Francisco's north and west sides.
- In most areas, existing building heights remain **40 feet** (**approximately four stories**).
- The Plan allows **two to four additional stories** in select locations, mainly **near shopping, transit, and on major streets**, with high-rise buildings permitted only in limited areas.
- The Plan uses a **form-based approach**, regulating height, bulk, and setbacks, and is paired with **objective design standards**.
- The stated goals include meeting state housing requirements, maintaining local control over land use decisions, and strengthening tenant protections by directing growth toward underused and vacant sites.

Within this framework, the North Beach area surrounding **Joe DiMaggio Playground** is identified for **increased maximum building heights**, which in turn has the potential to increase shadow on the playground.

III. OBJECTIVE OF THE SHADOW ANALYSIS

The objective of the shadow analysis is to **quantify net new shadow** that could occur on **Joe DiMaggio Playground** as a result of the **proposed Family Zoning height increases**, using standard methods applied in San Francisco shadow studies.

Specifically, the analysis aims to:

1. Measure **annual shadow load** on Joe DiMaggio Playground under:
    - Existing conditions, and
    - A scenario with Family Zoning Plan height increases.
2. Determine:
    - **Net new annual shadow** (in square foot hours, sfh),
    - **Percent of available sunlight time** affected,
    - **Maximum area of net new shadow** and **percentage of the playground covered**, and
    - **Dates, times of day, and seasons** when net new shadow occurs.

These results are summarized in the City's **"PROPOSED FAMILY ZONING HEIGHT INCREASE – JOE DIMAGGIO ANNUAL SHADOW LOADS / SQUARE FOOT HOURS (sfh)"** sheet, which is the primary quantitative source referenced here.

FASTCAST

IV. QUANTITATIVE SHADOW RESULTS – JOE DIMAGGIO PLAYGROUND

All values below are taken directly from the **Joe DiMaggio Playground shadow summary** unless otherwise noted. Note: Existing shadow is based on Data SF Building Footprints : https://data.sfgov.org/Geographic-Locations-and-Boundaries/Building-Footprints/ynuv-fyni/about_data and Zoning heights derived from Proposed zoning interactive map: https://experience.arcgis.com/experience/6e0e399f9c82456dbda233eacebc433d/

PROPOSED FAMILY ZONING HEIGHT INCREASE JOE DIMAGGIO ANNUAL SHADOW LOADS / SQUARE FOOT HOURS (sfh)			
Existing / Current Shadow	Project Net New Shadow	Existing + Project Shadow	Remaining Sunlight
9.63%	**1.485%**	**11.115%**	**88.89%**
31,210,748 sfh	4,814,888 sfh	36,025,636 sfh	288,182,732 sfh

Joe DiMaggio Annual Shadow Load with Project (sfh)	36,025,636 sfh

EXISTING SHADOW DETAILS	
Range in existing shadow area coverage throughout the year	Between 2% - 72%
Time of year / time of day most affected by existing shadow	Fall / Early Morning (before 8:00 AM)

NET NEW SHADOW DETAILS	
Days net new shadow would occur (date range)	Year-round
Date(s) with most sfh net new shadow	October 11 & March 1
Season / Time of day most affected by net new shadow	Winter / Late Afternoon (after 4:30 PM)
Area of largest net new shadow (date and time)	23,682 sf (October 11 & March 1 @ 5:37 PM)
Percentage of Joe DiMaggio covered by largest shadow	27.18%
Range in shadow coverage throughout the year (area range)	Between 0% - 27% (0 - 23,682 sf)
Average shadow size across affected dates (percent coverage)	4,488 sf (5.15%)
Date(s) with the longest duration of net new shadow (duration)	October 11 & March 1 (4 hr 6 min +/- 14 min)
Range in daily net new shadow duration across affected dates	Between zero minutes up to 4 hr 6 min (+/- 14 min)
Average daily net new shadow duration across affected dates	3 hr 22 min

Timing and Seasonal Pattern of Net New Shadow

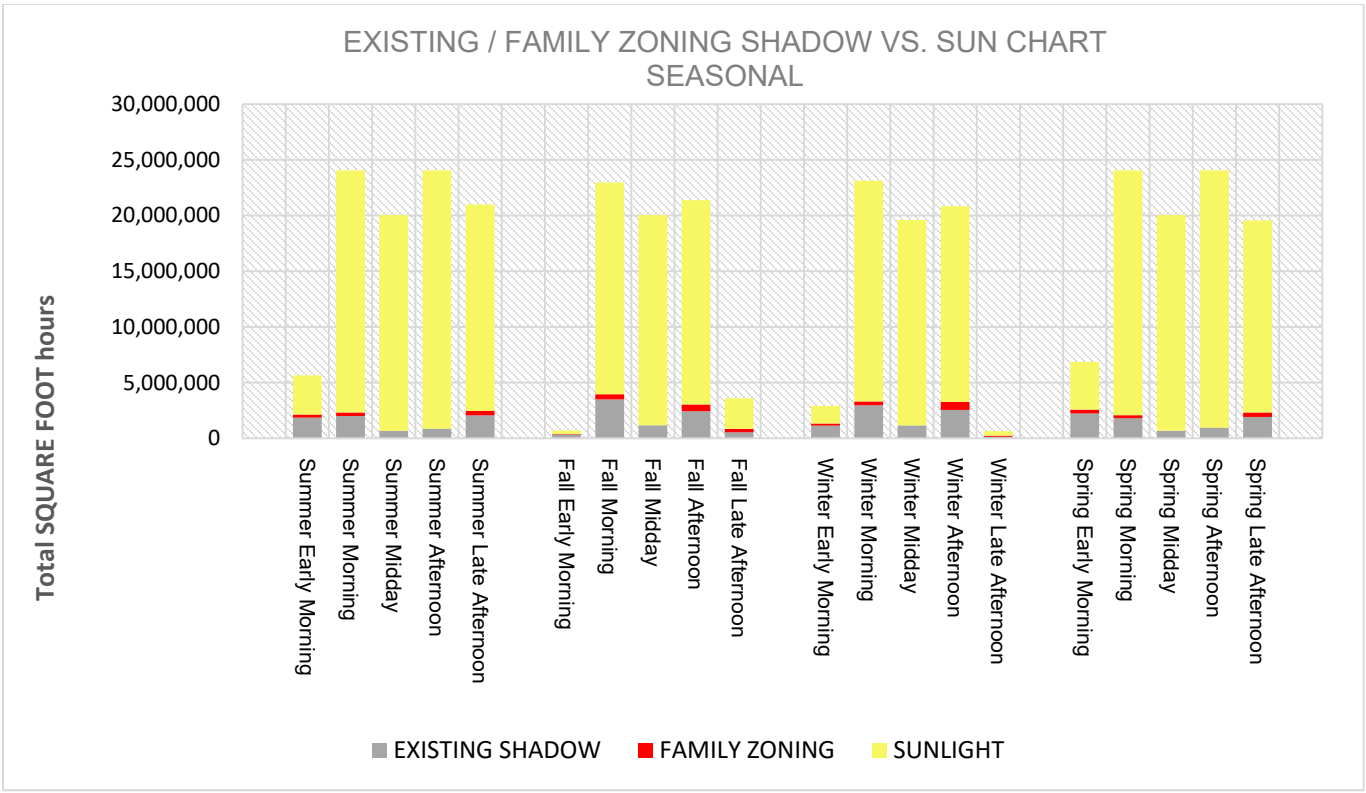
Also from the shadow summary:

- **Days net new shadow would occur:**
  - **Year-round**
- **Date(s) with most sfh net new shadow:**
  - **October 11 & March 1**
  - **Season / Time of day most affected by net new shadow: Winter / Late Afternoon (after 4:30 PM)**

Existing Shadow Context

For reference, the summary characterizes **existing shadow** as:

- **Range in existing shadow area coverage throughout the year: 2% – 72%** of the playground area
- **Time of year / time of day most affected by existing shadow: Fall / Early Morning (before 8:00 AM)**



V. QUALITATIVE CONTEXT: PLAYGROUND ACTIVITIES & TIME OF USE

This section does **not** evaluate impact or significance. It is limited to describing **typical types of activities** that commonly occur in neighborhood playgrounds like Joe DiMaggio during the times identified in the shadow summary.

A. Typical Playground Use Patterns

Based on the nature of Joe DiMaggio Playground as a neighborhood-serving facility (with play equipment, courts/fields, and open space), typical use patterns can reasonably be described as including:

- **Morning hours:**
  - Caregivers with young children,
  - Individual exercise and walking.
- **Midday / Early afternoon:**
  - Younger children and caregivers,
  - Some daytime recreation by residents and visitors.
- **Afternoon / Late afternoon (after school):**
  - **School-aged children and teens** using play areas and courts,
  - Potential **organized or informal sports activities**,
  - Families visiting after school pick-up.
- **Early evening (seasonally):**
  - Adults and families using the space after work,
  - Light recreation, socializing, and play until dusk.

These patterns are typical of urban playgrounds serving nearby residential neighborhoods with families.

B. Alignment with Net New Shadow Timing

The **shadow summary** identifies the **season and time of day most affected by net new shadow** as **"Winter / Late Afternoon (after 4:30 PM)"**, with net new shadow occurring **year-round** and the **longest durations and largest footprints** occurring around **October 11 and March 1 in the late afternoon (e.g., 5:37 PM for the largest single footprint).**
That time window generally overlaps with:

- **After-school hours** for school-aged children and teens, and
- **After-work hours** when adults and families may visit the playground.

The **existing shadow** is described as being most pronounced in **"Fall / Early Morning (before 8:00 AM)"**, which is a different part of the day than the late-afternoon period identified for net new shadow. This indicates that, under the Family Zoning scenario, the **distribution of shadow over the day** changes, with **additional shadow present during late-afternoon hours** when playground use often involves family and youth activities.
Again, this section is descriptive only and does not characterize these changes as beneficial or adverse.

VI. SUMMARY

- The Family Zoning Plan allows **increased building heights** in select areas, including near Joe DiMaggio Playground, in order to support housing production goals and apply form-based, objective design standards.
- The City's **Joe DiMaggio shadow summary** quantifies **net new annual shadow load, coverage, and timing** for the playground under the Family Zoning height scenario, showing:
    - Net new shadow of **4,814,888 sfh (1.485% of available sunlight time)**,
    - A combined total shadow load of **36,025,636 sfh (11.115%)**,
    - Maximum net new momentary coverage of **23,682 square feet (27.18% of the playground)** on specific dates and times, and
    - Concentration of net new shadow in **winter late afternoons (after 4:30 PM)**, with **year-round occurrence**.
- Typical playground use during late afternoons includes **after-school and after-work** activities by children, teens, and families, which may coincide in time with the **period identified as most affected by net new shadow**.

This concludes the **descriptive, non-evaluative summary** of the Family Zoning Plan context and the associated shadow analysis results for Joe DiMaggio Playground.

Conclusion

Fastcast has determined, based on the 3D digital zoning-based massing model and related design information provided by DataSF and the proposed Family Zoning Plan that the height increase would introduce net new shadow on Joe DiMaggio Playground relative to existing zoning conditions. The results presented herein reflect a programmatic, zoning-based analysis; as individual development proposals are advanced and more detailed building designs become available, additional project-specific shadow studies can be prepared using the same methodologies to further refine these findings.

Please direct any question to Adam Noble. adam@fastcastcity.com

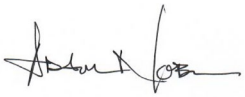


EXHIBIT A

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

FASTCAST

JUNE 21

Summer solstice
Analysis hours: 6:46 AM-7:36 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
6:46 AM	54,298 sf	62.33%	2,884 sf	3.31%	
7:00 AM	37,059 sf	42.54%	4,008 sf	4.60%	
7:15 AM	27,564 sf	31.64%	3,779 sf	4.34%	
7:30 AM	21,585 sf	24.78%	3,408 sf	3.91%	
7:45 AM	16,695 sf	19.16%	3,117 sf	3.58%	
8:00 AM	12,478 sf	14.32%	2,829 sf	3.25%	
8:15 AM	8,935 sf	10.26%	2,548 sf	2.92%	
8:30 AM	5,965 sf	6.85%	2,316 sf	2.66%	
8:45 AM	4,408 sf	5.06%	1,881 sf	2.16%	
9:00 AM	4,173 sf	4.79%	730 sf	0.84%	
9:15 AM	3,995 sf	4.59%	6 sf	0.01%	
9:30 AM	3,816 sf	4.38%	0 sf	0.00%	
9:45 AM	3,655 sf	4.20%	0 sf	0.00%	
10:00 AM	3,476 sf	3.99%	0 sf	0.00%	
10:15 AM	3,299 sf	3.79%	0 sf	0.00%	
10:30 AM	3,114 sf	3.57%	0 sf	0.00%	
10:45 AM	2,951 sf	3.39%	0 sf	0.00%	
11:00 AM	2,772 sf	3.18%	0 sf	0.00%	
11:15 AM	2,615 sf	3.00%	0 sf	0.00%	
11:30 AM	2,434 sf	2.79%	0 sf	0.00%	
11:45 AM	2,277 sf	2.61%	0 sf	0.00%	
12:00 PM	2,094 sf	2.40%	0 sf	0.00%	
12:15 PM	1,940 sf	2.23%	0 sf	0.00%	
12:30 PM	1,737 sf	1.99%	0 sf	0.00%	
12:45 PM	1,578 sf	1.81%	0 sf	0.00%	
1:00 PM	1,344 sf	1.54%	0 sf	0.00%	
1:15 PM	1,442 sf	1.66%	0 sf	0.00%	
1:30 PM	1,521 sf	1.75%	0 sf	0.00%	
1:45 PM	1,658 sf	1.90%	0 sf	0.00%	
2:00 PM	1,721 sf	1.98%	0 sf	0.00%	
2:15 PM	1,841 sf	2.11%	0 sf	0.00%	
2:30 PM	1,898 sf	2.18%	0 sf	0.00%	
2:45 PM	1,995 sf	2.29%	0 sf	0.00%	
3:00 PM	2,049 sf	2.35%	0 sf	0.00%	
3:15 PM	2,132 sf	2.45%	0 sf	0.00%	
3:30 PM	2,186 sf	2.51%	0 sf	0.00%	
3:45 PM	2,248 sf	2.58%	0 sf	0.00%	
4:00 PM	2,241 sf	2.57%	0 sf	0.00%	
4:15 PM	2,472 sf	2.84%	0 sf	0.00%	
4:30 PM	3,013 sf	3.46%	0 sf	0.00%	
4:45 PM	3,530 sf	4.05%	0 sf	0.00%	
5:00 PM	4,110 sf	4.72%	0 sf	0.00%	
5:15 PM	4,753 sf	5.46%	0 sf	0.00%	
5:30 PM	5,486 sf	6.30%	0 sf	0.00%	
5:45 PM	6,314 sf	7.25%	0 sf	0.00%	
6:00 PM	7,287 sf	8.36%	0 sf	0.00%	
6:15 PM	8,437 sf	9.68%	0 sf	0.00%	
6:30 PM	9,878 sf	11.34%	0 sf	0.00%	
6:45 PM	11,730 sf	13.46%	295 sf	0.34%	
7:00 PM	14,222 sf	16.33%	1,770 sf	2.03%	
7:15 PM	17,809 sf	20.44%	5,586 sf	6.41%	
7:36 PM	29,084 sf	33.38%	10,652 sf	12.23%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JUNE 28

Mirror date: June 14
Analysis hours: 6:48 AM-7:36 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
6:48 AM	54,172 sf	62.18%	2,814 sf	3.23%	
7:00 AM	38,856 sf	44.60%	4,046 sf	4.64%	
7:15 AM	28,513 sf	32.73%	3,845 sf	4.41%	
7:30 AM	22,279 sf	25.57%	3,463 sf	3.97%	
7:45 AM	17,311 sf	19.87%	3,154 sf	3.62%	
8:00 AM	12,968 sf	14.88%	2,875 sf	3.30%	
8:15 AM	9,336 sf	10.72%	2,593 sf	2.98%	
8:30 AM	6,273 sf	7.20%	2,353 sf	2.70%	
8:45 AM	4,507 sf	5.17%	2,014 sf	2.31%	
9:00 AM	4,222 sf	4.85%	875 sf	1.00%	
9:15 AM	4,036 sf	4.63%	30 sf	0.03%	
9:30 AM	3,857 sf	4.43%	0 sf	0.00%	
9:45 AM	3,694 sf	4.24%	0 sf	0.00%	
10:00 AM	3,516 sf	4.04%	0 sf	0.00%	
10:15 AM	3,340 sf	3.83%	0 sf	0.00%	
10:30 AM	3,152 sf	3.62%	0 sf	0.00%	
10:45 AM	2,989 sf	3.43%	0 sf	0.00%	
11:00 AM	2,807 sf	3.22%	0 sf	0.00%	
11:15 AM	2,650 sf	3.04%	0 sf	0.00%	
11:30 AM	2,469 sf	2.83%	0 sf	0.00%	
11:45 AM	2,308 sf	2.65%	0 sf	0.00%	
12:00 PM	2,127 sf	2.44%	0 sf	0.00%	
12:15 PM	1,973 sf	2.26%	0 sf	0.00%	
12:30 PM	1,769 sf	2.03%	0 sf	0.00%	
12:45 PM	1,612 sf	1.85%	0 sf	0.00%	
1:00 PM	1,364 sf	1.57%	0 sf	0.00%	
1:15 PM	1,451 sf	1.67%	0 sf	0.00%	
1:30 PM	1,523 sf	1.75%	0 sf	0.00%	
1:45 PM	1,661 sf	1.91%	0 sf	0.00%	
2:00 PM	1,728 sf	1.98%	0 sf	0.00%	
2:15 PM	1,848 sf	2.12%	0 sf	0.00%	
2:30 PM	1,902 sf	2.18%	0 sf	0.00%	
2:45 PM	2,006 sf	2.30%	0 sf	0.00%	
3:00 PM	2,063 sf	2.37%	0 sf	0.00%	
3:15 PM	2,146 sf	2.46%	0 sf	0.00%	
3:30 PM	2,197 sf	2.52%	0 sf	0.00%	
3:45 PM	2,264 sf	2.60%	0 sf	0.00%	
4:00 PM	2,230 sf	2.56%	0 sf	0.00%	
4:15 PM	2,455 sf	2.82%	0 sf	0.00%	
4:30 PM	2,953 sf	3.39%	0 sf	0.00%	
4:45 PM	3,470 sf	3.98%	0 sf	0.00%	
5:00 PM	4,046 sf	4.64%	0 sf	0.00%	
5:15 PM	4,679 sf	5.37%	0 sf	0.00%	
5:30 PM	5,407 sf	6.21%	0 sf	0.00%	
5:45 PM	6,230 sf	7.15%	0 sf	0.00%	
6:00 PM	7,192 sf	8.26%	0 sf	0.00%	
6:15 PM	8,321 sf	9.55%	0 sf	0.00%	
6:30 PM	9,741 sf	11.18%	0 sf	0.00%	
6:45 PM	11,553 sf	13.26%	223 sf	0.26%	
7:00 PM	13,976 sf	16.04%	1,556 sf	1.79%	
7:15 PM	17,471 sf	20.05%	5,228 sf	6.00%	
7:36 PM	28,841 sf	33.10%	10,732 sf	12.32%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JULY 5

Mirror date: June 7
Analysis hours: 6:52 AM-7:36 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
6:52 AM	53,801 sf	61.75%	2,547 sf	2.92%	
7:00 AM	41,891 sf	48.08%	4,088 sf	4.69%	
7:15 AM	29,973 sf	34.40%	3,979 sf	4.57%	
7:30 AM	23,337 sf	26.79%	3,577 sf	4.11%	
7:45 AM	18,182 sf	20.87%	3,252 sf	3.73%	
8:00 AM	13,674 sf	15.70%	2,949 sf	3.39%	
8:15 AM	9,879 sf	11.34%	2,662 sf	3.06%	
8:30 AM	6,755 sf	7.75%	2,412 sf	2.77%	
8:45 AM	4,826 sf	5.54%	2,115 sf	2.43%	
9:00 AM	4,330 sf	4.97%	1,079 sf	1.24%	
9:15 AM	4,139 sf	4.75%	107 sf	0.12%	
9:30 AM	3,954 sf	4.54%	0 sf	0.00%	
9:45 AM	3,782 sf	4.34%	0 sf	0.00%	
10:00 AM	3,600 sf	4.13%	0 sf	0.00%	
10:15 AM	3,421 sf	3.93%	0 sf	0.00%	
10:30 AM	3,230 sf	3.71%	0 sf	0.00%	
10:45 AM	3,063 sf	3.52%	0 sf	0.00%	
11:00 AM	2,880 sf	3.31%	0 sf	0.00%	
11:15 AM	2,722 sf	3.12%	0 sf	0.00%	
11:30 AM	2,539 sf	2.91%	0 sf	0.00%	
11:45 AM	2,377 sf	2.73%	0 sf	0.00%	
12:00 PM	2,192 sf	2.52%	0 sf	0.00%	
12:15 PM	2,041 sf	2.34%	0 sf	0.00%	
12:30 PM	1,835 sf	2.11%	0 sf	0.00%	
12:45 PM	1,675 sf	1.92%	0 sf	0.00%	
1:00 PM	1,424 sf	1.63%	0 sf	0.00%	
1:15 PM	1,483 sf	1.70%	0 sf	0.00%	
1:30 PM	1,568 sf	1.80%	0 sf	0.00%	
1:45 PM	1,705 sf	1.96%	0 sf	0.00%	
2:00 PM	1,776 sf	2.04%	0 sf	0.00%	
2:15 PM	1,894 sf	2.17%	0 sf	0.00%	
2:30 PM	1,956 sf	2.24%	0 sf	0.00%	
2:45 PM	2,062 sf	2.37%	0 sf	0.00%	
3:00 PM	2,117 sf	2.43%	0 sf	0.00%	
3:15 PM	2,204 sf	2.53%	0 sf	0.00%	
3:30 PM	2,256 sf	2.59%	0 sf	0.00%	
3:45 PM	2,337 sf	2.68%	0 sf	0.00%	
4:00 PM	2,358 sf	2.71%	0 sf	0.00%	
4:15 PM	2,466 sf	2.83%	0 sf	0.00%	
4:30 PM	2,885 sf	3.31%	0 sf	0.00%	
4:45 PM	3,408 sf	3.91%	0 sf	0.00%	
5:00 PM	3,984 sf	4.57%	0 sf	0.00%	
5:15 PM	4,615 sf	5.30%	0 sf	0.00%	
5:30 PM	5,340 sf	6.13%	0 sf	0.00%	
5:45 PM	6,165 sf	7.08%	0 sf	0.00%	
6:00 PM	7,127 sf	8.18%	0 sf	0.00%	
6:15 PM	8,255 sf	9.48%	0 sf	0.00%	
6:30 PM	9,671 sf	11.10%	0 sf	0.00%	
6:45 PM	11,478 sf	13.17%	170 sf	0.20%	
7:00 PM	13,898 sf	15.95%	1,396 sf	1.60%	
7:15 PM	17,367 sf	19.94%	4,992 sf	5.73%	
7:36 PM	28,122 sf	32.28%	10,951 sf	12.57%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JULY 12

Mirror date: May 31
Analysis hours: 6:56 AM-7:33 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
6:56 AM	53,097 sf	60.95%	2,408 sf	2.76%	
7:00 AM	47,045 sf	54.00%	3,395 sf	3.90%	
7:15 AM	32,076 sf	36.82%	4,194 sf	4.81%	
7:30 AM	24,775 sf	28.44%	3,764 sf	4.32%	
7:45 AM	19,251 sf	22.10%	3,412 sf	3.92%	
8:00 AM	14,578 sf	16.73%	3,072 sf	3.53%	
8:15 AM	10,583 sf	12.15%	2,769 sf	3.18%	
8:30 AM	7,405 sf	8.50%	2,490 sf	2.86%	
8:45 AM	5,297 sf	6.08%	2,234 sf	2.56%	
9:00 AM	4,503 sf	5.17%	1,333 sf	1.53%	
9:15 AM	4,299 sf	4.93%	244 sf	0.28%	
9:30 AM	4,099 sf	4.71%	0 sf	0.00%	
9:45 AM	3,921 sf	4.50%	0 sf	0.00%	
10:00 AM	3,732 sf	4.28%	0 sf	0.00%	
10:15 AM	3,545 sf	4.07%	0 sf	0.00%	
10:30 AM	3,347 sf	3.84%	0 sf	0.00%	
10:45 AM	3,178 sf	3.65%	0 sf	0.00%	
11:00 AM	2,989 sf	3.43%	0 sf	0.00%	
11:15 AM	2,825 sf	3.24%	0 sf	0.00%	
11:30 AM	2,640 sf	3.03%	0 sf	0.00%	
11:45 AM	2,482 sf	2.85%	0 sf	0.00%	
12:00 PM	2,290 sf	2.63%	0 sf	0.00%	
12:15 PM	2,134 sf	2.45%	0 sf	0.00%	
12:30 PM	1,930 sf	2.22%	0 sf	0.00%	
12:45 PM	1,769 sf	2.03%	0 sf	0.00%	
1:00 PM	1,511 sf	1.73%	0 sf	0.00%	
1:15 PM	1,552 sf	1.78%	0 sf	0.00%	
1:30 PM	1,648 sf	1.89%	0 sf	0.00%	
1:45 PM	1,788 sf	2.05%	0 sf	0.00%	
2:00 PM	1,857 sf	2.13%	0 sf	0.00%	
2:15 PM	1,980 sf	2.27%	0 sf	0.00%	
2:30 PM	2,043 sf	2.34%	0 sf	0.00%	
2:45 PM	2,144 sf	2.46%	0 sf	0.00%	
3:00 PM	2,204 sf	2.53%	0 sf	0.00%	
3:15 PM	2,300 sf	2.64%	0 sf	0.00%	
3:30 PM	2,352 sf	2.70%	0 sf	0.00%	
3:45 PM	2,434 sf	2.79%	0 sf	0.00%	
4:00 PM	2,473 sf	2.84%	0 sf	0.00%	
4:15 PM	2,494 sf	2.86%	0 sf	0.00%	
4:30 PM	2,739 sf	3.14%	0 sf	0.00%	
4:45 PM	3,340 sf	3.83%	0 sf	0.00%	
5:00 PM	3,920 sf	4.50%	0 sf	0.00%	
5:15 PM	4,559 sf	5.23%	0 sf	0.00%	
5:30 PM	5,289 sf	6.07%	0 sf	0.00%	
5:45 PM	6,121 sf	7.03%	0 sf	0.00%	
6:00 PM	7,093 sf	8.14%	0 sf	0.00%	
6:15 PM	8,235 sf	9.45%	0 sf	0.00%	
6:30 PM	9,661 sf	11.09%	0 sf	0.00%	
6:45 PM	11,496 sf	13.20%	125 sf	0.14%	
7:00 PM	13,972 sf	16.04%	1,296 sf	1.49%	
7:15 PM	17,555 sf	20.15%	5,128 sf	5.89%	
7:33 PM	26,959 sf	30.95%	11,312 sf	12.98%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JULY 19

Mirror date: May 24
Analysis hours: 7:01 AM-7:30 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:01 AM	52,271 sf	60.00%	2,281 sf	2.62%	
7:16 AM	33,985 sf	39.01%	4,487 sf	5.15%	
7:30 AM	26,609 sf	30.54%	4,026 sf	4.62%	
7:45 AM	20,576 sf	23.62%	3,616 sf	4.15%	
8:00 AM	15,675 sf	17.99%	3,246 sf	3.73%	
8:15 AM	11,348 sf	13.03%	2,894 sf	3.32%	
8:30 AM	8,334 sf	9.57%	2,614 sf	3.00%	
8:45 AM	5,925 sf	6.80%	2,348 sf	2.69%	
9:00 AM	4,748 sf	5.45%	1,645 sf	1.89%	
9:15 AM	4,521 sf	5.19%	435 sf	0.50%	
9:30 AM	4,297 sf	4.93%	0 sf	0.00%	
9:45 AM	4,101 sf	4.71%	0 sf	0.00%	
10:00 AM	3,908 sf	4.49%	0 sf	0.00%	
10:15 AM	3,712 sf	4.26%	0 sf	0.00%	
10:30 AM	3,506 sf	4.02%	0 sf	0.00%	
10:45 AM	3,328 sf	3.82%	0 sf	0.00%	
11:00 AM	3,134 sf	3.60%	0 sf	0.00%	
11:15 AM	2,966 sf	3.40%	0 sf	0.00%	
11:30 AM	2,777 sf	3.19%	0 sf	0.00%	
11:45 AM	2,612 sf	3.00%	0 sf	0.00%	
12:00 PM	2,418 sf	2.78%	0 sf	0.00%	
12:15 PM	2,259 sf	2.59%	0 sf	0.00%	
12:30 PM	2,055 sf	2.36%	0 sf	0.00%	
12:45 PM	1,889 sf	2.17%	0 sf	0.00%	
1:00 PM	1,634 sf	1.88%	0 sf	0.00%	
1:15 PM	1,667 sf	1.91%	0 sf	0.00%	
1:30 PM	1,764 sf	2.03%	0 sf	0.00%	
1:45 PM	1,906 sf	2.19%	0 sf	0.00%	
2:00 PM	1,976 sf	2.27%	0 sf	0.00%	
2:15 PM	2,103 sf	2.41%	0 sf	0.00%	
2:30 PM	2,169 sf	2.49%	0 sf	0.00%	
2:45 PM	2,279 sf	2.62%	0 sf	0.00%	
3:00 PM	2,341 sf	2.69%	0 sf	0.00%	
3:15 PM	2,433 sf	2.79%	0 sf	0.00%	
3:30 PM	2,495 sf	2.86%	0 sf	0.00%	
3:45 PM	2,579 sf	2.96%	0 sf	0.00%	
4:00 PM	2,632 sf	3.02%	0 sf	0.00%	
4:15 PM	2,708 sf	3.11%	0 sf	0.00%	
4:30 PM	2,796 sf	3.21%	0 sf	0.00%	
4:45 PM	3,271 sf	3.75%	0 sf	0.00%	
5:00 PM	3,867 sf	4.44%	0 sf	0.00%	
5:15 PM	4,521 sf	5.19%	0 sf	0.00%	
5:30 PM	5,258 sf	6.04%	0 sf	0.00%	
5:45 PM	6,110 sf	7.01%	0 sf	0.00%	
6:00 PM	7,108 sf	8.16%	0 sf	0.00%	
6:15 PM	8,283 sf	9.51%	0 sf	0.00%	
6:30 PM	9,748 sf	11.19%	0 sf	0.00%	
6:45 PM	11,658 sf	13.38%	95 sf	0.11%	
7:00 PM	14,252 sf	16.36%	1,311 sf	1.50%	
7:15 PM	18,041 sf	20.71%	5,948 sf	6.83%	
7:30 PM	25,516 sf	29.29%	11,670 sf	13.39%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

JULY 26

Mirror date: May 17
Analysis hours: 7:07 AM-7:25 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:07 AM	51,090 sf	58.64%	2,572 sf	2.95%	
7:15 AM	38,869 sf	44.62%	4,946 sf	5.68%	
7:30 AM	29,015 sf	33.30%	4,396 sf	5.05%	
7:45 AM	22,226 sf	25.51%	3,892 sf	4.47%	
8:00 AM	17,041 sf	19.56%	3,464 sf	3.98%	
8:15 AM	12,600 sf	14.46%	3,080 sf	3.54%	
8:30 AM	9,453 sf	10.85%	2,749 sf	3.16%	
8:45 AM	6,765 sf	7.77%	2,461 sf	2.82%	
9:00 AM	5,085 sf	5.84%	1,979 sf	2.27%	
9:15 AM	4,794 sf	5.50%	709 sf	0.81%	
9:30 AM	4,553 sf	5.23%	0 sf	0.00%	
9:45 AM	4,336 sf	4.98%	0 sf	0.00%	
10:00 AM	4,121 sf	4.73%	0 sf	0.00%	
10:15 AM	3,918 sf	4.50%	0 sf	0.00%	
10:30 AM	3,704 sf	4.25%	0 sf	0.00%	
10:45 AM	3,517 sf	4.04%	0 sf	0.00%	
11:00 AM	3,313 sf	3.80%	0 sf	0.00%	
11:15 AM	3,139 sf	3.60%	0 sf	0.00%	
11:30 AM	2,940 sf	3.37%	0 sf	0.00%	
11:45 AM	2,774 sf	3.18%	0 sf	0.00%	
12:00 PM	2,575 sf	2.96%	0 sf	0.00%	
12:15 PM	2,411 sf	2.77%	0 sf	0.00%	
12:30 PM	2,204 sf	2.53%	0 sf	0.00%	
12:45 PM	2,039 sf	2.34%	0 sf	0.00%	
1:00 PM	1,783 sf	2.05%	0 sf	0.00%	
1:15 PM	1,826 sf	2.10%	0 sf	0.00%	
1:30 PM	1,921 sf	2.21%	0 sf	0.00%	
1:45 PM	2,063 sf	2.37%	0 sf	0.00%	
2:00 PM	2,139 sf	2.45%	0 sf	0.00%	
2:15 PM	2,261 sf	2.60%	0 sf	0.00%	
2:30 PM	2,336 sf	2.68%	0 sf	0.00%	
2:45 PM	2,452 sf	2.81%	0 sf	0.00%	
3:00 PM	2,518 sf	2.89%	0 sf	0.00%	
3:15 PM	2,619 sf	3.01%	0 sf	0.00%	
3:30 PM	2,681 sf	3.08%	0 sf	0.00%	
3:45 PM	2,775 sf	3.19%	0 sf	0.00%	
4:00 PM	2,839 sf	3.26%	0 sf	0.00%	
4:15 PM	2,913 sf	3.34%	0 sf	0.00%	
4:30 PM	2,900 sf	3.33%	0 sf	0.00%	
4:45 PM	3,172 sf	3.64%	0 sf	0.00%	
5:00 PM	3,822 sf	4.39%	0 sf	0.00%	
5:15 PM	4,489 sf	5.15%	0 sf	0.00%	
5:30 PM	5,251 sf	6.03%	0 sf	0.00%	
5:45 PM	6,127 sf	7.03%	0 sf	0.00%	
6:00 PM	7,164 sf	8.22%	0 sf	0.00%	
6:15 PM	8,391 sf	9.63%	0 sf	0.00%	
6:30 PM	9,922 sf	11.39%	0 sf	0.00%	
6:45 PM	11,942 sf	13.71%	76 sf	0.09%	
7:00 PM	14,750 sf	16.93%	2,024 sf	2.32%	
7:15 PM	18,880 sf	21.67%	7,511 sf	8.62%	
7:25 PM	23,869 sf	27.40%	11,981 sf	13.75%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 2

Mirror date: May 10
Analysis hours: 7:12 AM-7:18 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:12 AM	48,899 sf	56.13%	3,210 sf	3.68%	
7:15 AM	44,825 sf	51.45%	4,215 sf	4.84%	
7:30 AM	31,918 sf	36.64%	4,868 sf	5.59%	
7:45 AM	24,175 sf	27.75%	4,263 sf	4.89%	
8:00 AM	18,553 sf	21.30%	3,728 sf	4.28%	
8:15 AM	14,279 sf	16.39%	3,295 sf	3.78%	
8:30 AM	10,743 sf	12.33%	2,923 sf	3.36%	
8:45 AM	7,817 sf	8.97%	2,600 sf	2.98%	
9:00 AM	5,672 sf	6.51%	2,244 sf	2.58%	
9:15 AM	5,131 sf	5.89%	1,027 sf	1.18%	
9:30 AM	4,852 sf	5.57%	31 sf	0.04%	
9:45 AM	4,613 sf	5.30%	0 sf	0.00%	
10:00 AM	4,376 sf	5.02%	0 sf	0.00%	
10:15 AM	4,168 sf	4.78%	0 sf	0.00%	
10:30 AM	3,937 sf	4.52%	0 sf	0.00%	
10:45 AM	3,739 sf	4.29%	0 sf	0.00%	
11:00 AM	3,523 sf	4.04%	0 sf	0.00%	
11:15 AM	3,342 sf	3.84%	0 sf	0.00%	
11:30 AM	3,133 sf	3.60%	0 sf	0.00%	
11:45 AM	2,962 sf	3.40%	0 sf	0.00%	
12:00 PM	2,757 sf	3.16%	0 sf	0.00%	
12:15 PM	2,591 sf	2.97%	0 sf	0.00%	
12:30 PM	2,382 sf	2.73%	0 sf	0.00%	
12:45 PM	2,210 sf	2.54%	0 sf	0.00%	
1:00 PM	1,959 sf	2.25%	0 sf	0.00%	
1:15 PM	2,024 sf	2.32%	0 sf	0.00%	
1:30 PM	2,120 sf	2.43%	0 sf	0.00%	
1:45 PM	2,258 sf	2.59%	0 sf	0.00%	
2:00 PM	2,339 sf	2.69%	0 sf	0.00%	
2:15 PM	2,465 sf	2.83%	0 sf	0.00%	
2:30 PM	2,542 sf	2.92%	0 sf	0.00%	
2:45 PM	2,661 sf	3.05%	0 sf	0.00%	
3:00 PM	2,738 sf	3.14%	0 sf	0.00%	
3:15 PM	2,844 sf	3.26%	0 sf	0.00%	
3:30 PM	2,912 sf	3.34%	0 sf	0.00%	
3:45 PM	3,018 sf	3.46%	0 sf	0.00%	
4:00 PM	3,086 sf	3.54%	0 sf	0.00%	
4:15 PM	3,193 sf	3.67%	0 sf	0.00%	
4:30 PM	3,263 sf	3.74%	0 sf	0.00%	
4:45 PM	3,320 sf	3.81%	0 sf	0.00%	
5:00 PM	3,739 sf	4.29%	0 sf	0.00%	
5:15 PM	4,484 sf	5.15%	0 sf	0.00%	
5:30 PM	5,284 sf	6.06%	0 sf	0.00%	
5:45 PM	6,195 sf	7.11%	0 sf	0.00%	
6:00 PM	7,291 sf	8.37%	0 sf	0.00%	
6:15 PM	8,600 sf	9.87%	0 sf	0.00%	
6:30 PM	10,238 sf	11.75%	20 sf	0.02%	
6:45 PM	12,439 sf	14.28%	571 sf	0.66%	
7:00 PM	15,579 sf	17.88%	3,668 sf	4.21%	
7:15 PM	20,473 sf	23.50%	9,975 sf	11.45%	
7:18 PM	22,329 sf	25.63%	11,739 sf	13.47%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 9

Mirror date: May 3
Analysis hours: 7:19 AM-7:10 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:19 AM	47,564 sf	54.60%	3,935 sf	4.52%	
7:30 AM	35,705 sf	40.98%	5,440 sf	6.24%	
7:45 AM	26,531 sf	30.45%	4,730 sf	5.43%	
8:00 AM	20,849 sf	23.93%	4,088 sf	4.69%	
8:15 AM	16,239 sf	18.64%	3,560 sf	4.09%	
8:30 AM	12,269 sf	14.08%	3,131 sf	3.59%	
8:45 AM	9,041 sf	10.38%	2,768 sf	3.18%	
9:00 AM	6,489 sf	7.45%	2,425 sf	2.78%	
9:15 AM	5,524 sf	6.34%	1,383 sf	1.59%	
9:30 AM	5,210 sf	5.98%	162 sf	0.19%	
9:45 AM	4,940 sf	5.67%	0 sf	0.00%	
10:00 AM	4,678 sf	5.37%	0 sf	0.00%	
10:15 AM	4,449 sf	5.11%	0 sf	0.00%	
10:30 AM	4,206 sf	4.83%	0 sf	0.00%	
10:45 AM	3,993 sf	4.58%	0 sf	0.00%	
11:00 AM	3,769 sf	4.33%	0 sf	0.00%	
11:15 AM	3,570 sf	4.10%	0 sf	0.00%	
11:30 AM	3,356 sf	3.85%	0 sf	0.00%	
11:45 AM	3,181 sf	3.65%	0 sf	0.00%	
12:00 PM	2,969 sf	3.41%	0 sf	0.00%	
12:15 PM	2,796 sf	3.21%	0 sf	0.00%	
12:30 PM	2,582 sf	2.96%	0 sf	0.00%	
12:45 PM	2,405 sf	2.76%	0 sf	0.00%	
1:00 PM	2,161 sf	2.48%	0 sf	0.00%	
1:15 PM	2,255 sf	2.59%	0 sf	0.00%	
1:30 PM	2,348 sf	2.69%	0 sf	0.00%	
1:45 PM	2,489 sf	2.86%	0 sf	0.00%	
2:00 PM	2,572 sf	2.95%	0 sf	0.00%	
2:15 PM	2,707 sf	3.11%	0 sf	0.00%	
2:30 PM	2,790 sf	3.20%	0 sf	0.00%	
2:45 PM	2,916 sf	3.35%	0 sf	0.00%	
3:00 PM	2,993 sf	3.44%	0 sf	0.00%	
3:15 PM	3,113 sf	3.57%	0 sf	0.00%	
3:30 PM	3,195 sf	3.67%	0 sf	0.00%	
3:45 PM	3,308 sf	3.80%	0 sf	0.00%	
4:00 PM	3,388 sf	3.89%	0 sf	0.00%	
4:15 PM	3,499 sf	4.02%	0 sf	0.00%	
4:30 PM	3,591 sf	4.12%	0 sf	0.00%	
4:45 PM	3,715 sf	4.26%	0 sf	0.00%	
5:00 PM	3,848 sf	4.42%	0 sf	0.00%	
5:15 PM	4,499 sf	5.16%	0 sf	0.00%	
5:30 PM	5,347 sf	6.14%	0 sf	0.00%	
5:45 PM	6,322 sf	7.26%	0 sf	0.00%	
6:00 PM	7,490 sf	8.60%	0 sf	0.00%	
6:15 PM	8,906 sf	10.22%	38 sf	0.04%	
6:30 PM	10,707 sf	12.29%	646 sf	0.74%	
6:45 PM	13,191 sf	15.14%	1,973 sf	2.26%	
7:10 PM	20,827 sf	23.91%	11,528 sf	13.23%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 16

Mirror date: April 26
Analysis hours: 7:25 AM-7:02 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:25 AM	47,761 sf	54.82%	4,668 sf	5.36%	
7:30 AM	41,320 sf	47.43%	5,845 sf	6.71%	
7:45 AM	30,535 sf	35.05%	5,324 sf	6.11%	
8:00 AM	23,646 sf	27.14%	4,536 sf	5.21%	
8:15 AM	18,585 sf	21.33%	3,889 sf	4.46%	
8:30 AM	14,077 sf	16.16%	3,376 sf	3.88%	
8:45 AM	10,458 sf	12.00%	2,964 sf	3.40%	
9:00 AM	7,514 sf	8.62%	2,604 sf	2.99%	
9:15 AM	5,982 sf	6.87%	1,796 sf	2.06%	
9:30 AM	5,623 sf	6.45%	383 sf	0.44%	
9:45 AM	5,318 sf	6.10%	0 sf	0.00%	
10:00 AM	5,027 sf	5.77%	0 sf	0.00%	
10:15 AM	4,774 sf	5.48%	0 sf	0.00%	
10:30 AM	4,509 sf	5.18%	0 sf	0.00%	
10:45 AM	4,281 sf	4.91%	0 sf	0.00%	
11:00 AM	4,052 sf	4.65%	0 sf	0.00%	
11:15 AM	3,842 sf	4.41%	0 sf	0.00%	
11:30 AM	3,612 sf	4.15%	0 sf	0.00%	
11:45 AM	3,421 sf	3.93%	0 sf	0.00%	
12:00 PM	3,203 sf	3.68%	0 sf	0.00%	
12:15 PM	3,026 sf	3.47%	0 sf	0.00%	
12:30 PM	2,811 sf	3.23%	0 sf	0.00%	
12:45 PM	2,630 sf	3.02%	0 sf	0.00%	
1:00 PM	2,394 sf	2.75%	0 sf	0.00%	
1:15 PM	2,524 sf	2.90%	0 sf	0.00%	
1:30 PM	2,617 sf	3.00%	0 sf	0.00%	
1:45 PM	2,760 sf	3.17%	0 sf	0.00%	
2:00 PM	2,850 sf	3.27%	0 sf	0.00%	
2:15 PM	2,986 sf	3.43%	0 sf	0.00%	
2:30 PM	3,074 sf	3.53%	0 sf	0.00%	
2:45 PM	3,210 sf	3.68%	0 sf	0.00%	
3:00 PM	3,298 sf	3.79%	0 sf	0.00%	
3:15 PM	3,431 sf	3.94%	0 sf	0.00%	
3:30 PM	3,519 sf	4.04%	0 sf	0.00%	
3:45 PM	3,645 sf	4.18%	0 sf	0.00%	
4:00 PM	3,749 sf	4.30%	0 sf	0.00%	
4:15 PM	3,879 sf	4.45%	0 sf	0.00%	
4:30 PM	3,999 sf	4.59%	0 sf	0.00%	
4:45 PM	4,134 sf	4.75%	0 sf	0.00%	
5:00 PM	4,283 sf	4.92%	0 sf	0.00%	
5:15 PM	4,533 sf	5.20%	0 sf	0.00%	
5:30 PM	5,442 sf	6.25%	0 sf	0.00%	
5:45 PM	6,492 sf	7.45%	0 sf	0.00%	
6:00 PM	7,765 sf	8.91%	81 sf	0.09%	
6:15 PM	9,339 sf	10.72%	840 sf	0.96%	
6:30 PM	11,363 sf	13.04%	2,115 sf	2.43%	
6:45 PM	14,244 sf	16.35%	3,921 sf	4.50%	
7:02 PM	19,740 sf	22.66%	11,497 sf	13.20%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 23

Mirror date: April 19
Analysis hours: 7:31 AM-6:52 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:31 AM	49,794 sf	57.16%	5,555 sf	6.38%	
7:45 AM	35,845 sf	41.14%	5,990 sf	6.88%	
8:00 AM	26,999 sf	30.99%	5,084 sf	5.84%	
8:15 AM	21,114 sf	24.24%	4,292 sf	4.93%	
8:30 AM	16,082 sf	18.46%	3,674 sf	4.22%	
8:45 AM	12,020 sf	13.80%	3,182 sf	3.65%	
9:00 AM	8,672 sf	9.95%	2,776 sf	3.19%	
9:15 AM	6,533 sf	7.50%	2,192 sf	2.52%	
9:30 AM	6,083 sf	6.98%	646 sf	0.74%	
9:45 AM	5,739 sf	6.59%	0 sf	0.00%	
10:00 AM	5,409 sf	6.21%	0 sf	0.00%	
10:15 AM	5,131 sf	5.89%	0 sf	0.00%	
10:30 AM	4,843 sf	5.56%	0 sf	0.00%	
10:45 AM	4,602 sf	5.28%	0 sf	0.00%	
11:00 AM	4,341 sf	4.98%	0 sf	0.00%	
11:15 AM	4,132 sf	4.74%	0 sf	0.00%	
11:30 AM	3,892 sf	4.47%	0 sf	0.00%	
11:45 AM	3,696 sf	4.24%	0 sf	0.00%	
12:00 PM	3,471 sf	3.98%	0 sf	0.00%	
12:15 PM	3,284 sf	3.77%	0 sf	0.00%	
12:30 PM	3,059 sf	3.51%	0 sf	0.00%	
12:45 PM	2,867 sf	3.29%	0 sf	0.00%	
1:00 PM	2,667 sf	3.06%	0 sf	0.00%	
1:15 PM	2,825 sf	3.24%	0 sf	0.00%	
1:30 PM	2,926 sf	3.36%	0 sf	0.00%	
1:45 PM	3,069 sf	3.52%	0 sf	0.00%	
2:00 PM	3,164 sf	3.63%	0 sf	0.00%	
2:15 PM	3,304 sf	3.79%	0 sf	0.00%	
2:30 PM	3,407 sf	3.91%	0 sf	0.00%	
2:45 PM	3,551 sf	4.08%	0 sf	0.00%	
3:00 PM	3,655 sf	4.20%	0 sf	0.00%	
3:15 PM	3,794 sf	4.35%	0 sf	0.00%	
3:30 PM	3,904 sf	4.48%	0 sf	0.00%	
3:45 PM	4,052 sf	4.65%	0 sf	0.00%	
4:00 PM	4,165 sf	4.78%	0 sf	0.00%	
4:15 PM	4,327 sf	4.97%	0 sf	0.00%	
4:30 PM	4,458 sf	5.12%	0 sf	0.00%	
4:45 PM	4,647 sf	5.33%	0 sf	0.00%	
5:00 PM	4,824 sf	5.54%	0 sf	0.00%	
5:15 PM	5,061 sf	5.81%	0 sf	0.00%	
5:30 PM	5,505 sf	6.32%	0 sf	0.00%	
5:45 PM	6,760 sf	7.76%	168 sf	0.19%	
6:00 PM	8,184 sf	9.39%	1,072 sf	1.23%	
6:15 PM	9,975 sf	11.45%	2,417 sf	2.77%	
6:30 PM	12,345 sf	14.17%	4,204 sf	4.83%	
6:45 PM	16,012 sf	18.38%	7,130 sf	8.18%	
6:52 PM	19,022 sf	21.83%	11,173 sf	12.82%	

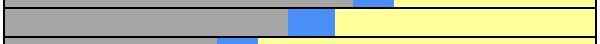
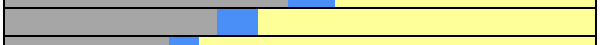
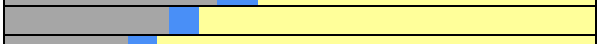
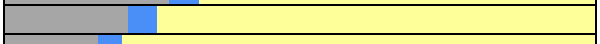
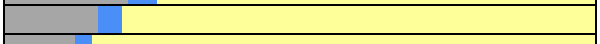
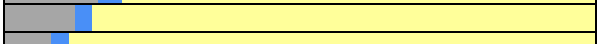
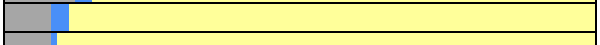
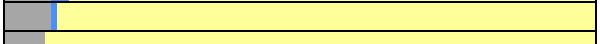
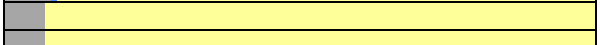
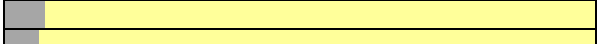
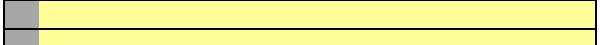
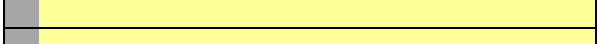
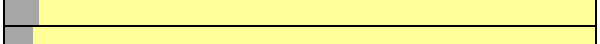
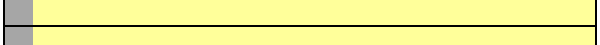
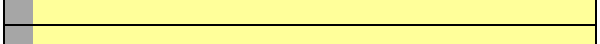
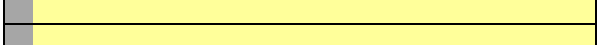
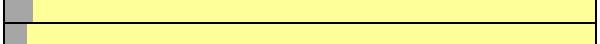
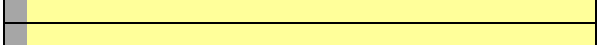
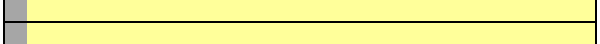
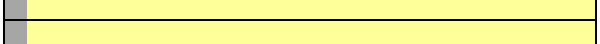
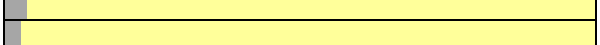
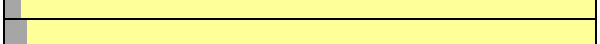
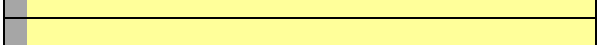
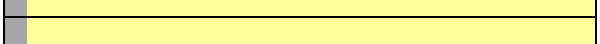
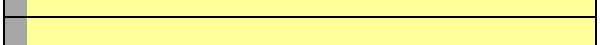
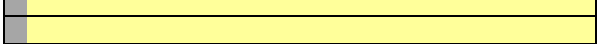
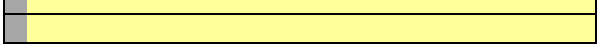
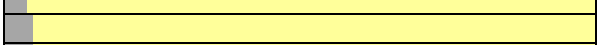
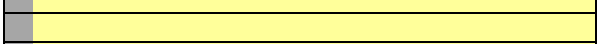
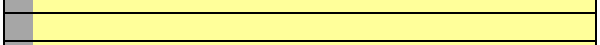
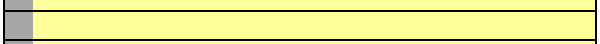
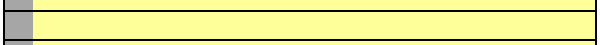
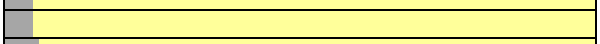
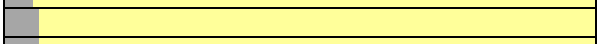
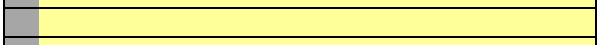
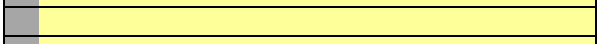
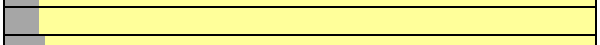
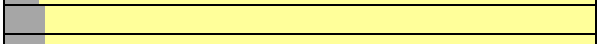
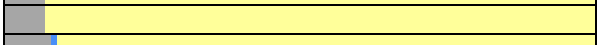
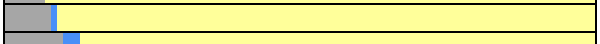
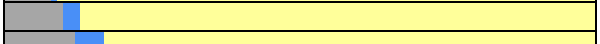
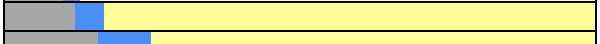
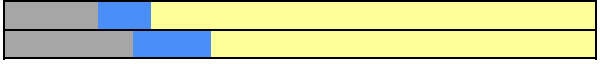
PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

AUGUST 30

Mirror date: April 12
Analysis hours: 7:37 AM-6:42 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:37 AM	51,378 sf	58.97%	6,128 sf	7.03%	
7:45 AM	42,077 sf	48.30%	6,569 sf	7.54%	
8:00 AM	31,050 sf	35.64%	5,750 sf	6.60%	
8:15 AM	23,975 sf	27.52%	4,748 sf	5.45%	
8:30 AM	18,431 sf	21.16%	3,986 sf	4.58%	
8:45 AM	13,812 sf	15.85%	3,398 sf	3.90%	
9:00 AM	10,078 sf	11.57%	2,926 sf	3.36%	
9:15 AM	7,344 sf	8.43%	2,468 sf	2.83%	
9:30 AM	6,600 sf	7.58%	976 sf	1.12%	
9:45 AM	6,204 sf	7.12%	0 sf	0.00%	
10:00 AM	5,837 sf	6.70%	0 sf	0.00%	
10:15 AM	5,526 sf	6.34%	0 sf	0.00%	
10:30 AM	5,216 sf	5.99%	0 sf	0.00%	
10:45 AM	4,950 sf	5.68%	0 sf	0.00%	
11:00 AM	4,674 sf	5.37%	0 sf	0.00%	
11:15 AM	4,450 sf	5.11%	0 sf	0.00%	
11:30 AM	4,196 sf	4.82%	0 sf	0.00%	
11:45 AM	3,989 sf	4.58%	0 sf	0.00%	
12:00 PM	3,759 sf	4.32%	0 sf	0.00%	
12:15 PM	3,567 sf	4.09%	0 sf	0.00%	
12:30 PM	3,338 sf	3.83%	0 sf	0.00%	
12:45 PM	3,147 sf	3.61%	0 sf	0.00%	
1:00 PM	2,985 sf	3.43%	0 sf	0.00%	
1:15 PM	3,168 sf	3.64%	0 sf	0.00%	
1:30 PM	3,268 sf	3.75%	0 sf	0.00%	
1:45 PM	3,418 sf	3.92%	0 sf	0.00%	
2:00 PM	3,516 sf	4.04%	0 sf	0.00%	
2:15 PM	3,673 sf	4.22%	0 sf	0.00%	
2:30 PM	3,782 sf	4.34%	0 sf	0.00%	
2:45 PM	3,934 sf	4.52%	0 sf	0.00%	
3:00 PM	4,052 sf	4.65%	0 sf	0.00%	
3:15 PM	4,215 sf	4.84%	0 sf	0.00%	
3:30 PM	4,340 sf	4.98%	0 sf	0.00%	
3:45 PM	4,507 sf	5.17%	0 sf	0.00%	
4:00 PM	4,653 sf	5.34%	0 sf	0.00%	
4:15 PM	4,844 sf	5.56%	0 sf	0.00%	
4:30 PM	5,019 sf	5.76%	0 sf	0.00%	
4:45 PM	5,239 sf	6.01%	0 sf	0.00%	
5:00 PM	5,496 sf	6.31%	0 sf	0.00%	
5:15 PM	5,783 sf	6.64%	0 sf	0.00%	
5:30 PM	6,102 sf	7.00%	265 sf	0.30%	
5:45 PM	7,111 sf	8.16%	1,248 sf	1.43%	
6:00 PM	8,743 sf	10.04%	2,673 sf	3.07%	
6:15 PM	10,847 sf	12.45%	4,619 sf	5.30%	
6:30 PM	13,976 sf	16.04%	7,537 sf	8.65%	
6:42 PM	18,780 sf	21.56%	10,984 sf	12.61%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

SEPTEMBER 6

Mirror date: April 5
Analysis hours: 7:44 AM-6:31 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:44 AM	51,583 sf	59.21%	6,349 sf	7.29%	
8:00 AM	35,558 sf	40.82%	6,199 sf	7.12%	
8:15 AM	27,140 sf	31.15%	5,098 sf	5.85%	
8:30 AM	21,004 sf	24.11%	4,222 sf	4.85%	
8:45 AM	15,770 sf	18.10%	3,569 sf	4.10%	
9:00 AM	11,600 sf	13.32%	3,055 sf	3.51%	
9:15 AM	8,406 sf	9.65%	2,619 sf	3.01%	
9:30 AM	7,169 sf	8.23%	1,322 sf	1.52%	
9:45 AM	6,717 sf	7.71%	35 sf	0.04%	
10:00 AM	6,300 sf	7.23%	0 sf	0.00%	
10:15 AM	5,963 sf	6.84%	0 sf	0.00%	
10:30 AM	5,617 sf	6.45%	0 sf	0.00%	
10:45 AM	5,334 sf	6.12%	0 sf	0.00%	
11:00 AM	5,043 sf	5.79%	0 sf	0.00%	
11:15 AM	4,802 sf	5.51%	0 sf	0.00%	
11:30 AM	4,538 sf	5.21%	0 sf	0.00%	
11:45 AM	4,315 sf	4.95%	0 sf	0.00%	
12:00 PM	4,074 sf	4.68%	0 sf	0.00%	
12:15 PM	3,874 sf	4.45%	0 sf	0.00%	
12:30 PM	3,640 sf	4.18%	0 sf	0.00%	
12:45 PM	3,403 sf	3.91%	0 sf	0.00%	
1:00 PM	3,367 sf	3.86%	0 sf	0.00%	
1:15 PM	3,544 sf	4.07%	0 sf	0.00%	
1:30 PM	3,646 sf	4.18%	0 sf	0.00%	
1:45 PM	3,800 sf	4.36%	0 sf	0.00%	
2:00 PM	3,913 sf	4.49%	0 sf	0.00%	
2:15 PM	4,072 sf	4.67%	0 sf	0.00%	
2:30 PM	4,193 sf	4.81%	0 sf	0.00%	
2:45 PM	4,370 sf	5.02%	0 sf	0.00%	
3:00 PM	4,501 sf	5.17%	0 sf	0.00%	
3:15 PM	4,683 sf	5.37%	0 sf	0.00%	
3:30 PM	4,830 sf	5.54%	0 sf	0.00%	
3:45 PM	5,036 sf	5.78%	0 sf	0.00%	
4:00 PM	5,217 sf	5.99%	0 sf	0.00%	
4:15 PM	5,444 sf	6.25%	0 sf	0.00%	
4:30 PM	5,666 sf	6.50%	0 sf	0.00%	
4:45 PM	5,950 sf	6.83%	0 sf	0.00%	
5:00 PM	6,254 sf	7.18%	0 sf	0.00%	
5:15 PM	6,630 sf	7.61%	396 sf	0.45%	
5:30 PM	7,134 sf	8.19%	1,335 sf	1.53%	
5:45 PM	7,737 sf	8.88%	2,848 sf	3.27%	
6:00 PM	9,498 sf	10.90%	4,921 sf	5.65%	
6:15 PM	12,376 sf	14.21%	8,246 sf	9.46%	
6:31 PM	18,770 sf	21.54%	13,560 sf	15.56%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

SEPTEMBER 13

Mirror date: March 29
Analysis hours: 7:50 AM-6:21 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:50 AM	50,273 sf	57.71%	6,355 sf	7.29%	
8:00 AM	39,499 sf	45.34%	6,482 sf	7.44%	
8:15 AM	29,502 sf	33.86%	5,471 sf	6.28%	
8:30 AM	22,804 sf	26.18%	4,477 sf	5.14%	
8:45 AM	17,204 sf	19.75%	3,746 sf	4.30%	
9:00 AM	12,773 sf	14.66%	3,183 sf	3.65%	
9:15 AM	9,286 sf	10.66%	2,730 sf	3.13%	
9:30 AM	7,542 sf	8.66%	1,693 sf	1.94%	
9:45 AM	7,088 sf	8.14%	170 sf	0.19%	
10:00 AM	6,704 sf	7.69%	0 sf	0.00%	
10:15 AM	6,361 sf	7.30%	0 sf	0.00%	
10:30 AM	6,063 sf	6.96%	0 sf	0.00%	
10:45 AM	5,761 sf	6.61%	0 sf	0.00%	
11:00 AM	5,448 sf	6.25%	0 sf	0.00%	
11:15 AM	5,181 sf	5.95%	0 sf	0.00%	
11:30 AM	4,898 sf	5.62%	0 sf	0.00%	
11:45 AM	4,672 sf	5.36%	0 sf	0.00%	
12:00 PM	4,420 sf	5.07%	0 sf	0.00%	
12:15 PM	4,214 sf	4.84%	0 sf	0.00%	
12:30 PM	3,970 sf	4.56%	0 sf	0.00%	
12:45 PM	3,751 sf	4.31%	0 sf	0.00%	
1:00 PM	3,791 sf	4.35%	0 sf	0.00%	
1:15 PM	3,956 sf	4.54%	0 sf	0.00%	
1:30 PM	4,063 sf	4.66%	0 sf	0.00%	
1:45 PM	4,226 sf	4.85%	0 sf	0.00%	
2:00 PM	4,346 sf	4.99%	0 sf	0.00%	
2:15 PM	4,524 sf	5.19%	0 sf	0.00%	
2:30 PM	4,658 sf	5.35%	0 sf	0.00%	
2:45 PM	4,847 sf	5.56%	0 sf	0.00%	
3:00 PM	5,003 sf	5.74%	0 sf	0.00%	
3:15 PM	5,213 sf	5.98%	0 sf	0.00%	
3:30 PM	5,394 sf	6.19%	0 sf	0.00%	
3:45 PM	5,629 sf	6.46%	0 sf	0.00%	
4:00 PM	5,852 sf	6.72%	0 sf	0.00%	
4:15 PM	6,139 sf	7.05%	0 sf	0.00%	
4:30 PM	6,418 sf	7.37%	0 sf	0.00%	
4:45 PM	6,788 sf	7.79%	36 sf	0.04%	
5:00 PM	7,188 sf	8.25%	518 sf	0.59%	
5:15 PM	7,717 sf	8.86%	1,419 sf	1.63%	
5:30 PM	8,362 sf	9.60%	2,769 sf	3.18%	
5:45 PM	9,273 sf	10.64%	5,045 sf	5.79%	
6:00 PM	10,898 sf	12.51%	8,608 sf	9.88%	
6:15 PM	16,029 sf	18.40%	13,134 sf	15.08%	
6:21 PM	18,876 sf	21.67%	16,664 sf	19.13%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

SEPTEMBER 20

Fall equinox (Spring equinox on March 22 similar)
Analysis hours: 7:57 AM-6:09 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:57 AM	48,971 sf	56.21%	6,393 sf	7.34%	
8:00 AM	44,700 sf	51.31%	6,801 sf	7.81%	
8:15 AM	32,008 sf	36.74%	5,865 sf	6.73%	
8:30 AM	24,397 sf	28.00%	4,773 sf	5.48%	
8:45 AM	18,510 sf	21.25%	3,953 sf	4.54%	
9:00 AM	13,724 sf	15.75%	3,317 sf	3.81%	
9:15 AM	9,958 sf	11.43%	2,829 sf	3.25%	
9:30 AM	7,589 sf	8.71%	2,092 sf	2.40%	
9:45 AM	7,131 sf	8.19%	396 sf	0.45%	
10:00 AM	6,763 sf	7.76%	0 sf	0.00%	
10:15 AM	6,427 sf	7.38%	0 sf	0.00%	
10:30 AM	6,131 sf	7.04%	0 sf	0.00%	
10:45 AM	5,854 sf	6.72%	0 sf	0.00%	
11:00 AM	5,600 sf	6.43%	0 sf	0.00%	
11:15 AM	5,362 sf	6.15%	0 sf	0.00%	
11:30 AM	5,141 sf	5.90%	0 sf	0.00%	
11:45 AM	4,939 sf	5.67%	0 sf	0.00%	
12:00 PM	4,746 sf	5.45%	0 sf	0.00%	
12:15 PM	4,570 sf	5.25%	0 sf	0.00%	
12:30 PM	4,334 sf	4.97%	0 sf	0.00%	
12:45 PM	4,138 sf	4.75%	0 sf	0.00%	
1:00 PM	4,241 sf	4.87%	0 sf	0.00%	
1:15 PM	4,404 sf	5.06%	0 sf	0.00%	
1:30 PM	4,516 sf	5.18%	0 sf	0.00%	
1:45 PM	4,690 sf	5.38%	0 sf	0.00%	
2:00 PM	4,822 sf	5.54%	0 sf	0.00%	
2:15 PM	5,015 sf	5.76%	0 sf	0.00%	
2:30 PM	5,166 sf	5.93%	0 sf	0.00%	
2:45 PM	5,381 sf	6.18%	0 sf	0.00%	
3:00 PM	5,564 sf	6.39%	0 sf	0.00%	
3:15 PM	5,805 sf	6.66%	0 sf	0.00%	
3:30 PM	6,023 sf	6.91%	0 sf	0.00%	
3:45 PM	6,309 sf	7.24%	0 sf	0.00%	
4:00 PM	6,577 sf	7.55%	0 sf	0.00%	
4:15 PM	6,934 sf	7.96%	0 sf	0.00%	
4:30 PM	7,307 sf	8.39%	99 sf	0.11%	
4:45 PM	7,784 sf	8.93%	546 sf	0.63%	
5:00 PM	8,321 sf	9.55%	1,360 sf	1.56%	
5:15 PM	9,028 sf	10.36%	2,637 sf	3.03%	
5:30 PM	9,912 sf	11.38%	4,651 sf	5.34%	
5:45 PM	11,638 sf	13.36%	8,117 sf	9.32%	
6:00 PM	15,343 sf	17.61%	13,814 sf	15.86%	
6:09 PM	19,013 sf	21.82%	20,103 sf	23.08%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

SEPTEMBER 27

Mirror date: March 15
Analysis hours: 8:03 AM-5:58 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:03 AM	47,524 sf	54.55%	6,398 sf	7.34%	
8:15 AM	35,019 sf	40.20%	6,254 sf	7.18%	
8:30 AM	26,112 sf	29.97%	5,127 sf	5.89%	
8:45 AM	19,923 sf	22.87%	4,186 sf	4.80%	
9:00 AM	14,724 sf	16.90%	3,480 sf	3.99%	
9:15 AM	10,705 sf	12.29%	2,948 sf	3.38%	
9:30 AM	7,691 sf	8.83%	2,458 sf	2.82%	
9:45 AM	7,111 sf	8.16%	685 sf	0.79%	
10:00 AM	6,725 sf	7.72%	0 sf	0.00%	
10:15 AM	6,401 sf	7.35%	0 sf	0.00%	
10:30 AM	6,116 sf	7.02%	0 sf	0.00%	
10:45 AM	5,852 sf	6.72%	0 sf	0.00%	
11:00 AM	5,614 sf	6.44%	0 sf	0.00%	
11:15 AM	5,384 sf	6.18%	0 sf	0.00%	
11:30 AM	5,178 sf	5.94%	0 sf	0.00%	
11:45 AM	4,985 sf	5.72%	0 sf	0.00%	
12:00 PM	4,796 sf	5.51%	0 sf	0.00%	
12:15 PM	4,613 sf	5.30%	0 sf	0.00%	
12:30 PM	4,431 sf	5.09%	0 sf	0.00%	
12:45 PM	4,341 sf	4.98%	0 sf	0.00%	
1:00 PM	4,541 sf	5.21%	0 sf	0.00%	
1:15 PM	4,738 sf	5.44%	0 sf	0.00%	
1:30 PM	4,926 sf	5.65%	0 sf	0.00%	
1:45 PM	5,135 sf	5.89%	0 sf	0.00%	
2:00 PM	5,340 sf	6.13%	0 sf	0.00%	
2:15 PM	5,552 sf	6.37%	0 sf	0.00%	
2:30 PM	5,727 sf	6.57%	0 sf	0.00%	
2:45 PM	5,966 sf	6.85%	0 sf	0.00%	
3:00 PM	6,182 sf	7.10%	0 sf	0.00%	
3:15 PM	6,460 sf	7.42%	0 sf	0.00%	
3:30 PM	6,727 sf	7.72%	0 sf	0.00%	
3:45 PM	7,066 sf	8.11%	0 sf	0.00%	
4:00 PM	7,407 sf	8.50%	0 sf	0.00%	
4:15 PM	7,852 sf	9.01%	143 sf	0.16%	
4:30 PM	8,332 sf	9.56%	511 sf	0.59%	
4:45 PM	8,956 sf	10.28%	1,221 sf	1.40%	
5:00 PM	9,677 sf	11.11%	2,395 sf	2.75%	
5:15 PM	10,670 sf	12.25%	4,275 sf	4.91%	
5:30 PM	12,408 sf	14.24%	7,222 sf	8.29%	
5:45 PM	15,944 sf	18.30%	12,848 sf	14.75%	
5:58 PM	21,172 sf	24.30%	22,202 sf	25.48%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

OCTOBER 4

Mirror date: March 8
Analysis hours: 8:09 AM-5:47 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:09 AM	46,677 sf	53.58%	6,434 sf	7.39%	
8:15 AM	40,180 sf	46.12%	6,501 sf	7.46%	
8:30 AM	28,410 sf	32.61%	5,559 sf	6.38%	
8:45 AM	21,439 sf	24.61%	4,472 sf	5.13%	
9:00 AM	15,853 sf	18.20%	3,693 sf	4.24%	
9:15 AM	11,527 sf	13.23%	3,094 sf	3.55%	
9:30 AM	8,163 sf	9.37%	2,599 sf	2.98%	
9:45 AM	7,075 sf	8.12%	1,070 sf	1.23%	
10:00 AM	6,698 sf	7.69%	0 sf	0.00%	
10:15 AM	6,372 sf	7.31%	0 sf	0.00%	
10:30 AM	6,088 sf	6.99%	0 sf	0.00%	
10:45 AM	5,824 sf	6.69%	0 sf	0.00%	
11:00 AM	5,583 sf	6.41%	0 sf	0.00%	
11:15 AM	5,360 sf	6.15%	0 sf	0.00%	
11:30 AM	5,154 sf	5.92%	0 sf	0.00%	
11:45 AM	4,957 sf	5.69%	0 sf	0.00%	
12:00 PM	4,789 sf	5.50%	0 sf	0.00%	
12:15 PM	4,620 sf	5.30%	0 sf	0.00%	
12:30 PM	4,443 sf	5.10%	0 sf	0.00%	
12:45 PM	4,424 sf	5.08%	0 sf	0.00%	
1:00 PM	4,643 sf	5.33%	0 sf	0.00%	
1:15 PM	4,875 sf	5.60%	0 sf	0.00%	
1:30 PM	5,088 sf	5.84%	0 sf	0.00%	
1:45 PM	5,312 sf	6.10%	0 sf	0.00%	
2:00 PM	5,537 sf	6.36%	0 sf	0.00%	
2:15 PM	5,795 sf	6.65%	0 sf	0.00%	
2:30 PM	6,050 sf	6.94%	0 sf	0.00%	
2:45 PM	6,350 sf	7.29%	0 sf	0.00%	
3:00 PM	6,654 sf	7.64%	0 sf	0.00%	
3:15 PM	7,007 sf	8.04%	0 sf	0.00%	
3:30 PM	7,384 sf	8.48%	0 sf	0.00%	
3:45 PM	7,820 sf	8.98%	0 sf	0.00%	
4:00 PM	8,307 sf	9.53%	119 sf	0.14%	
4:15 PM	8,892 sf	10.21%	440 sf	0.51%	
4:30 PM	9,517 sf	10.92%	1,000 sf	1.15%	
4:45 PM	10,337 sf	11.87%	2,078 sf	2.38%	
5:00 PM	11,321 sf	12.99%	3,797 sf	4.36%	
5:15 PM	13,160 sf	15.11%	6,402 sf	7.35%	
5:30 PM	16,396 sf	18.82%	11,567 sf	13.28%	
5:47 PM	23,202 sf	26.63%	23,546 sf	27.03%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

OCTOBER 11

Mirror date: March 1
Analysis hours: 8:16 AM-5:37 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:16 AM	47,593 sf	54.63%	6,445 sf	7.40%	
8:30 AM	31,988 sf	36.72%	5,996 sf	6.88%	
8:45 AM	23,183 sf	26.61%	4,817 sf	5.53%	
9:00 AM	17,155 sf	19.69%	3,926 sf	4.51%	
9:15 AM	12,468 sf	14.31%	3,266 sf	3.75%	
9:30 AM	8,774 sf	10.07%	2,746 sf	3.15%	
9:45 AM	7,044 sf	8.09%	1,531 sf	1.76%	
10:00 AM	6,662 sf	7.65%	24 sf	0.03%	
10:15 AM	6,337 sf	7.27%	0 sf	0.00%	
10:30 AM	6,058 sf	6.95%	0 sf	0.00%	
10:45 AM	5,801 sf	6.66%	0 sf	0.00%	
11:00 AM	5,559 sf	6.38%	0 sf	0.00%	
11:15 AM	5,335 sf	6.12%	0 sf	0.00%	
11:30 AM	5,131 sf	5.89%	0 sf	0.00%	
11:45 AM	4,938 sf	5.67%	0 sf	0.00%	
12:00 PM	4,769 sf	5.47%	0 sf	0.00%	
12:15 PM	4,596 sf	5.28%	0 sf	0.00%	
12:30 PM	4,406 sf	5.06%	0 sf	0.00%	
12:45 PM	4,524 sf	5.19%	0 sf	0.00%	
1:00 PM	4,743 sf	5.44%	0 sf	0.00%	
1:15 PM	4,969 sf	5.70%	0 sf	0.00%	
1:30 PM	5,188 sf	5.96%	0 sf	0.00%	
1:45 PM	5,424 sf	6.23%	0 sf	0.00%	
2:00 PM	5,675 sf	6.51%	0 sf	0.00%	
2:15 PM	5,950 sf	6.83%	0 sf	0.00%	
2:30 PM	6,247 sf	7.17%	0 sf	0.00%	
2:45 PM	6,560 sf	7.53%	0 sf	0.00%	
3:00 PM	6,900 sf	7.92%	0 sf	0.00%	
3:15 PM	7,286 sf	8.36%	0 sf	0.00%	
3:30 PM	7,703 sf	8.84%	1 sf	0.00%	
3:45 PM	8,189 sf	9.40%	73 sf	0.08%	
4:00 PM	8,745 sf	10.04%	319 sf	0.37%	
4:15 PM	9,415 sf	10.81%	762 sf	0.87%	
4:30 PM	10,214 sf	11.72%	1,657 sf	1.90%	
4:45 PM	11,226 sf	12.89%	3,291 sf	3.78%	
5:00 PM	12,880 sf	14.78%	5,580 sf	6.41%	
5:15 PM	15,792 sf	18.13%	10,343 sf	11.87%	
5:30 PM	20,669 sf	23.72%	18,729 sf	21.50%	
5:37 PM	24,126 sf	27.69%	23,682 sf	27.18%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

OCTOBER 18

Mirror date: February 22
Analysis hours: 8:22 AM-5:27 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:22 AM	49,356 sf	56.65%	6,407 sf	7.35%	
8:30 AM	39,444 sf	45.28%	6,313 sf	7.25%	
8:45 AM	26,211 sf	30.09%	5,247 sf	6.02%	
9:00 AM	18,682 sf	21.44%	4,215 sf	4.84%	
9:15 AM	13,562 sf	15.57%	3,469 sf	3.98%	
9:30 AM	9,551 sf	10.96%	2,890 sf	3.32%	
9:45 AM	7,027 sf	8.07%	2,062 sf	2.37%	
10:00 AM	6,625 sf	7.60%	188 sf	0.22%	
10:15 AM	6,299 sf	7.23%	0 sf	0.00%	
10:30 AM	6,024 sf	6.91%	0 sf	0.00%	
10:45 AM	5,767 sf	6.62%	0 sf	0.00%	
11:00 AM	5,537 sf	6.36%	0 sf	0.00%	
11:15 AM	5,315 sf	6.10%	0 sf	0.00%	
11:30 AM	5,111 sf	5.87%	0 sf	0.00%	
11:45 AM	4,923 sf	5.65%	0 sf	0.00%	
12:00 PM	4,755 sf	5.46%	0 sf	0.00%	
12:15 PM	4,595 sf	5.27%	0 sf	0.00%	
12:30 PM	4,416 sf	5.07%	0 sf	0.00%	
12:45 PM	4,591 sf	5.27%	0 sf	0.00%	
1:00 PM	4,820 sf	5.53%	0 sf	0.00%	
1:15 PM	5,051 sf	5.80%	0 sf	0.00%	
1:30 PM	5,281 sf	6.06%	0 sf	0.00%	
1:45 PM	5,528 sf	6.35%	0 sf	0.00%	
2:00 PM	5,787 sf	6.64%	0 sf	0.00%	
2:15 PM	6,079 sf	6.98%	0 sf	0.00%	
2:30 PM	6,391 sf	7.34%	0 sf	0.00%	
2:45 PM	6,728 sf	7.72%	0 sf	0.00%	
3:00 PM	7,097 sf	8.15%	0 sf	0.00%	
3:15 PM	7,511 sf	8.62%	0 sf	0.00%	
3:30 PM	7,978 sf	9.16%	15 sf	0.02%	
3:45 PM	8,511 sf	9.77%	190 sf	0.22%	
4:00 PM	9,128 sf	10.48%	492 sf	0.57%	
4:15 PM	9,887 sf	11.35%	1,215 sf	1.39%	
4:30 PM	10,804 sf	12.40%	2,651 sf	3.04%	
4:45 PM	12,255 sf	14.07%	4,803 sf	5.51%	
5:00 PM	14,625 sf	16.79%	8,955 sf	10.28%	
5:15 PM	18,254 sf	20.95%	15,624 sf	17.93%	
5:27 PM	24,202 sf	27.78%	22,907 sf	26.29%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

OCTOBER 25

Mirror date: February 15
Analysis hours: 7:30 AM-4:18 PM (PST)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:30 AM	51,336 sf	58.93%	5,893 sf	6.76%	
7:45 AM	32,576 sf	37.39%	5,790 sf	6.65%	
8:00 AM	21,547 sf	24.73%	4,568 sf	5.24%	
8:15 AM	14,922 sf	17.13%	3,712 sf	4.26%	
8:30 AM	10,530 sf	12.09%	3,061 sf	3.51%	
8:45 AM	7,289 sf	8.37%	2,511 sf	2.88%	
9:00 AM	6,606 sf	7.58%	571 sf	0.66%	
9:15 AM	6,272 sf	7.20%	0 sf	0.00%	
9:30 AM	6,002 sf	6.89%	0 sf	0.00%	
9:45 AM	5,744 sf	6.59%	0 sf	0.00%	
10:00 AM	5,513 sf	6.33%	0 sf	0.00%	
10:15 AM	5,299 sf	6.08%	0 sf	0.00%	
10:30 AM	5,090 sf	5.84%	0 sf	0.00%	
10:45 AM	4,910 sf	5.64%	0 sf	0.00%	
11:00 AM	4,749 sf	5.45%	0 sf	0.00%	
11:15 AM	4,593 sf	5.27%	0 sf	0.00%	
11:30 AM	4,439 sf	5.10%	0 sf	0.00%	
11:45 AM	4,654 sf	5.34%	0 sf	0.00%	
12:00 PM	4,885 sf	5.61%	0 sf	0.00%	
12:15 PM	5,128 sf	5.89%	0 sf	0.00%	
12:30 PM	5,367 sf	6.16%	0 sf	0.00%	
12:45 PM	5,624 sf	6.46%	0 sf	0.00%	
1:00 PM	5,896 sf	6.77%	0 sf	0.00%	
1:15 PM	6,202 sf	7.12%	0 sf	0.00%	
1:30 PM	6,528 sf	7.49%	0 sf	0.00%	
1:45 PM	6,893 sf	7.91%	0 sf	0.00%	
2:00 PM	7,282 sf	8.36%	0 sf	0.00%	
2:15 PM	7,731 sf	8.87%	0 sf	0.00%	
2:30 PM	8,229 sf	9.45%	97 sf	0.11%	
2:45 PM	8,819 sf	10.12%	291 sf	0.33%	
3:00 PM	9,500 sf	10.90%	715 sf	0.82%	
3:15 PM	10,350 sf	11.88%	1,914 sf	2.20%	
3:30 PM	11,536 sf	13.24%	3,813 sf	4.38%	
3:45 PM	13,493 sf	15.49%	7,533 sf	8.65%	
4:00 PM	16,681 sf	19.15%	13,991 sf	16.06%	
4:15 PM	22,420 sf	25.73%	20,793 sf	23.87%	
4:18 PM	24,096 sf	27.66%	21,706 sf	24.92%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 1

Mirror date: February 8
Analysis hours: 7:36 AM-4:10 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:36 AM	53,393 sf	61.29%	5,303 sf	6.09%	
7:45 AM	41,612 sf	47.76%	5,811 sf	6.67%	
8:00 AM	27,149 sf	31.16%	5,000 sf	5.74%	
8:15 AM	17,945 sf	20.60%	4,002 sf	4.59%	
8:30 AM	11,806 sf	13.55%	3,269 sf	3.75%	
8:45 AM	8,030 sf	9.22%	2,706 sf	3.11%	
9:00 AM	6,601 sf	7.58%	1,129 sf	1.30%	
9:15 AM	6,254 sf	7.18%	0 sf	0.00%	
9:30 AM	5,977 sf	6.86%	0 sf	0.00%	
9:45 AM	5,727 sf	6.57%	0 sf	0.00%	
10:00 AM	5,495 sf	6.31%	0 sf	0.00%	
10:15 AM	5,284 sf	6.06%	0 sf	0.00%	
10:30 AM	5,080 sf	5.83%	0 sf	0.00%	
10:45 AM	4,898 sf	5.62%	0 sf	0.00%	
11:00 AM	4,748 sf	5.45%	0 sf	0.00%	
11:15 AM	4,591 sf	5.27%	0 sf	0.00%	
11:30 AM	4,485 sf	5.15%	0 sf	0.00%	
11:45 AM	4,705 sf	5.40%	0 sf	0.00%	
12:00 PM	4,947 sf	5.68%	0 sf	0.00%	
12:15 PM	5,195 sf	5.96%	0 sf	0.00%	
12:30 PM	5,445 sf	6.25%	0 sf	0.00%	
12:45 PM	5,714 sf	6.56%	0 sf	0.00%	
1:00 PM	5,988 sf	6.87%	0 sf	0.00%	
1:15 PM	6,314 sf	7.25%	0 sf	0.00%	
1:30 PM	6,654 sf	7.64%	0 sf	0.00%	
1:45 PM	7,036 sf	8.08%	0 sf	0.00%	
2:00 PM	7,451 sf	8.55%	0 sf	0.00%	
2:15 PM	7,934 sf	9.11%	28 sf	0.03%	
2:30 PM	8,468 sf	9.72%	119 sf	0.14%	
2:45 PM	9,107 sf	10.45%	266 sf	0.31%	
3:00 PM	9,853 sf	11.31%	1,111 sf	1.27%	
3:15 PM	10,863 sf	12.47%	2,800 sf	3.21%	
3:30 PM	12,362 sf	14.19%	5,846 sf	6.71%	
3:45 PM	14,775 sf	16.96%	11,579 sf	13.29%	
4:00 PM	19,191 sf	22.03%	17,790 sf	20.42%	
4:10 PM	24,483 sf	28.10%	19,556 sf	22.45%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 8

Mirror date: February 1
Analysis hours: 7:43 AM-4:03 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:43 AM	55,430 sf	63.63%	4,886 sf	5.61%	
7:45 AM	53,511 sf	61.42%	5,070 sf	5.82%	
8:00 AM	34,979 sf	40.15%	5,259 sf	6.04%	
8:15 AM	23,271 sf	26.71%	4,374 sf	5.02%	
8:30 AM	14,809 sf	17.00%	3,524 sf	4.05%	
8:45 AM	9,424 sf	10.82%	2,883 sf	3.31%	
9:00 AM	6,613 sf	7.59%	1,811 sf	2.08%	
9:15 AM	6,252 sf	7.18%	25 sf	0.03%	
9:30 AM	5,968 sf	6.85%	0 sf	0.00%	
9:45 AM	5,720 sf	6.57%	0 sf	0.00%	
10:00 AM	5,492 sf	6.30%	0 sf	0.00%	
10:15 AM	5,276 sf	6.06%	0 sf	0.00%	
10:30 AM	5,077 sf	5.83%	0 sf	0.00%	
10:45 AM	4,901 sf	5.63%	0 sf	0.00%	
11:00 AM	4,755 sf	5.46%	0 sf	0.00%	
11:15 AM	4,604 sf	5.28%	0 sf	0.00%	
11:30 AM	4,514 sf	5.18%	0 sf	0.00%	
11:45 AM	4,744 sf	5.45%	0 sf	0.00%	
12:00 PM	4,994 sf	5.73%	0 sf	0.00%	
12:15 PM	5,251 sf	6.03%	0 sf	0.00%	
12:30 PM	5,503 sf	6.32%	0 sf	0.00%	
12:45 PM	5,784 sf	6.64%	0 sf	0.00%	
1:00 PM	6,066 sf	6.96%	0 sf	0.00%	
1:15 PM	6,401 sf	7.35%	0 sf	0.00%	
1:30 PM	6,760 sf	7.76%	0 sf	0.00%	
1:45 PM	7,173 sf	8.23%	0 sf	0.00%	
2:00 PM	7,601 sf	8.72%	0 sf	0.00%	
2:15 PM	8,104 sf	9.30%	16 sf	0.02%	
2:30 PM	8,672 sf	9.95%	83 sf	0.10%	
2:45 PM	9,355 sf	10.74%	377 sf	0.43%	
3:00 PM	10,167 sf	11.67%	1,621 sf	1.86%	
3:15 PM	11,341 sf	13.02%	4,143 sf	4.76%	
3:30 PM	13,065 sf	15.00%	8,806 sf	10.11%	
3:45 PM	16,324 sf	18.74%	14,673 sf	16.84%	
4:00 PM	24,209 sf	27.79%	17,105 sf	19.63%	
4:03 PM	27,281 sf	31.31%	16,856 sf	19.35%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 15

Mirror date: January 25
Analysis hours: 7:51 AM-3:57 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:51 AM	57,456 sf	65.95%	4,431 sf	5.09%	
8:00 AM	44,494 sf	51.07%	5,133 sf	5.89%	
8:15 AM	29,993 sf	34.43%	4,572 sf	5.25%	
8:30 AM	19,421 sf	22.29%	3,823 sf	4.39%	
8:45 AM	12,326 sf	14.15%	3,104 sf	3.56%	
9:00 AM	7,383 sf	8.47%	2,508 sf	2.88%	
9:15 AM	6,271 sf	7.20%	368 sf	0.42%	
9:30 AM	5,967 sf	6.85%	0 sf	0.00%	
9:45 AM	5,723 sf	6.57%	0 sf	0.00%	
10:00 AM	5,494 sf	6.31%	0 sf	0.00%	
10:15 AM	5,282 sf	6.06%	0 sf	0.00%	
10:30 AM	5,082 sf	5.83%	0 sf	0.00%	
10:45 AM	4,904 sf	5.63%	0 sf	0.00%	
11:00 AM	4,764 sf	5.47%	0 sf	0.00%	
11:15 AM	4,619 sf	5.30%	0 sf	0.00%	
11:30 AM	4,538 sf	5.21%	0 sf	0.00%	
11:45 AM	4,772 sf	5.48%	0 sf	0.00%	
12:00 PM	5,029 sf	5.77%	0 sf	0.00%	
12:15 PM	5,292 sf	6.07%	0 sf	0.00%	
12:30 PM	5,552 sf	6.37%	0 sf	0.00%	
12:45 PM	5,835 sf	6.70%	0 sf	0.00%	
1:00 PM	6,127 sf	7.03%	0 sf	0.00%	
1:15 PM	6,471 sf	7.43%	0 sf	0.00%	
1:30 PM	6,838 sf	7.85%	0 sf	0.00%	
1:45 PM	7,253 sf	8.33%	0 sf	0.00%	
2:00 PM	7,709 sf	8.85%	0 sf	0.00%	
2:15 PM	8,235 sf	9.45%	4 sf	0.00%	
2:30 PM	8,834 sf	10.14%	54 sf	0.06%	
2:45 PM	9,552 sf	10.96%	602 sf	0.69%	
3:00 PM	10,422 sf	11.96%	2,338 sf	2.68%	
3:15 PM	11,766 sf	13.51%	5,933 sf	6.81%	
3:30 PM	13,946 sf	16.01%	11,220 sf	12.88%	
3:45 PM	19,955 sf	22.91%	14,991 sf	17.21%	
3:57 PM	31,138 sf	35.74%	14,108 sf	16.19%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 22

Mirror date: January 18
Analysis hours: 7:57 AM-3:54 PM (PST)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
7:57 AM	59,462 sf	68.25%	4,024 sf	4.62%	
8:00 AM	56,106 sf	64.40%	4,258 sf	4.89%	
8:15 AM	37,839 sf	43.43%	4,598 sf	5.28%	
8:30 AM	25,145 sf	28.86%	4,022 sf	4.62%	
8:45 AM	16,356 sf	18.77%	3,360 sf	3.86%	
9:00 AM	9,898 sf	11.36%	2,721 sf	3.12%	
9:15 AM	7,077 sf	8.12%	1,031 sf	1.18%	
9:30 AM	6,019 sf	6.91%	0 sf	0.00%	
9:45 AM	5,735 sf	6.58%	0 sf	0.00%	
10:00 AM	5,508 sf	6.32%	0 sf	0.00%	
10:15 AM	5,293 sf	6.08%	0 sf	0.00%	
10:30 AM	5,094 sf	5.85%	0 sf	0.00%	
10:45 AM	4,921 sf	5.65%	0 sf	0.00%	
11:00 AM	4,782 sf	5.49%	0 sf	0.00%	
11:15 AM	4,642 sf	5.33%	0 sf	0.00%	
11:30 AM	4,551 sf	5.22%	0 sf	0.00%	
11:45 AM	4,786 sf	5.49%	0 sf	0.00%	
12:00 PM	5,042 sf	5.79%	0 sf	0.00%	
12:15 PM	5,311 sf	6.10%	0 sf	0.00%	
12:30 PM	5,580 sf	6.40%	0 sf	0.00%	
12:45 PM	5,869 sf	6.74%	0 sf	0.00%	
1:00 PM	6,165 sf	7.08%	0 sf	0.00%	
1:15 PM	6,509 sf	7.47%	0 sf	0.00%	
1:30 PM	6,887 sf	7.90%	0 sf	0.00%	
1:45 PM	7,318 sf	8.40%	0 sf	0.00%	
2:00 PM	7,785 sf	8.94%	0 sf	0.00%	
2:15 PM	8,321 sf	9.55%	0 sf	0.00%	
2:30 PM	8,937 sf	10.26%	31 sf	0.04%	
2:45 PM	9,680 sf	11.11%	824 sf	0.95%	
3:00 PM	10,624 sf	12.20%	3,146 sf	3.61%	
3:15 PM	12,246 sf	14.06%	7,550 sf	8.67%	
3:30 PM	15,814 sf	18.15%	12,449 sf	14.29%	
3:45 PM	24,777 sf	28.44%	13,761 sf	15.80%	
3:54 PM	34,860 sf	40.01%	11,627 sf	13.35%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

NOVEMBER 29

Mirror date: January 11
Analysis hours: 8:04 AM-3:51 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:04 AM	60,975 sf	69.99%	3,790 sf	4.35%	
8:15 AM	46,327 sf	53.18%	4,521 sf	5.19%	
8:30 AM	31,415 sf	36.06%	4,084 sf	4.69%	
8:45 AM	20,984 sf	24.09%	3,555 sf	4.08%	
9:00 AM	13,129 sf	15.07%	2,935 sf	3.37%	
9:15 AM	8,485 sf	9.74%	1,824 sf	2.09%	
9:30 AM	6,811 sf	7.82%	0 sf	0.00%	
9:45 AM	5,872 sf	6.74%	0 sf	0.00%	
10:00 AM	5,532 sf	6.35%	0 sf	0.00%	
10:15 AM	5,316 sf	6.10%	0 sf	0.00%	
10:30 AM	5,117 sf	5.87%	0 sf	0.00%	
10:45 AM	4,940 sf	5.67%	0 sf	0.00%	
11:00 AM	4,804 sf	5.51%	0 sf	0.00%	
11:15 AM	4,670 sf	5.36%	0 sf	0.00%	
11:30 AM	4,546 sf	5.22%	0 sf	0.00%	
11:45 AM	4,759 sf	5.46%	0 sf	0.00%	
12:00 PM	5,000 sf	5.74%	0 sf	0.00%	
12:15 PM	5,294 sf	6.08%	0 sf	0.00%	
12:30 PM	5,585 sf	6.41%	0 sf	0.00%	
12:45 PM	5,879 sf	6.75%	0 sf	0.00%	
1:00 PM	6,178 sf	7.09%	0 sf	0.00%	
1:15 PM	6,517 sf	7.48%	0 sf	0.00%	
1:30 PM	6,904 sf	7.92%	0 sf	0.00%	
1:45 PM	7,335 sf	8.42%	0 sf	0.00%	
2:00 PM	7,810 sf	8.96%	0 sf	0.00%	
2:15 PM	8,358 sf	9.59%	0 sf	0.00%	
2:30 PM	8,980 sf	10.31%	24 sf	0.03%	
2:45 PM	9,745 sf	11.19%	1,069 sf	1.23%	
3:00 PM	10,930 sf	12.55%	3,847 sf	4.42%	
3:15 PM	13,003 sf	14.93%	8,515 sf	9.77%	
3:30 PM	17,870 sf	20.51%	12,500 sf	14.35%	
3:45 PM	29,585 sf	33.96%	12,017 sf	13.79%	
3:51 PM	38,226 sf	43.88%	9,782 sf	11.23%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

DECEMBER 6

Mirror date: January 4
Analysis hours: 8:10 AM-3:51 PM (PST)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:10 AM	62,077 sf	71.25%	3,623 sf	4.16%	
8:15 AM	55,171 sf	63.33%	3,964 sf	4.55%	
8:30 AM	37,834 sf	43.43%	4,133 sf	4.74%	
8:45 AM	25,717 sf	29.52%	3,623 sf	4.16%	
9:00 AM	16,650 sf	19.11%	3,157 sf	3.62%	
9:15 AM	10,386 sf	11.92%	2,530 sf	2.90%	
9:30 AM	7,843 sf	9.00%	260 sf	0.30%	
9:45 AM	6,564 sf	7.53%	0 sf	0.00%	
10:00 AM	5,653 sf	6.49%	0 sf	0.00%	
10:15 AM	5,348 sf	6.14%	0 sf	0.00%	
10:30 AM	5,150 sf	5.91%	0 sf	0.00%	
10:45 AM	4,967 sf	5.70%	0 sf	0.00%	
11:00 AM	4,834 sf	5.55%	0 sf	0.00%	
11:15 AM	4,701 sf	5.40%	0 sf	0.00%	
11:30 AM	4,542 sf	5.21%	0 sf	0.00%	
11:45 AM	4,757 sf	5.46%	0 sf	0.00%	
12:00 PM	5,024 sf	5.77%	0 sf	0.00%	
12:15 PM	5,298 sf	6.08%	0 sf	0.00%	
12:30 PM	5,573 sf	6.40%	0 sf	0.00%	
12:45 PM	5,859 sf	6.72%	0 sf	0.00%	
1:00 PM	6,163 sf	7.07%	0 sf	0.00%	
1:15 PM	6,497 sf	7.46%	0 sf	0.00%	
1:30 PM	6,881 sf	7.90%	0 sf	0.00%	
1:45 PM	7,318 sf	8.40%	0 sf	0.00%	
2:00 PM	7,793 sf	8.95%	0 sf	0.00%	
2:15 PM	8,341 sf	9.57%	0 sf	0.00%	
2:30 PM	8,961 sf	10.29%	23 sf	0.03%	
2:45 PM	9,870 sf	11.33%	1,182 sf	1.36%	
3:00 PM	11,182 sf	12.83%	4,220 sf	4.84%	
3:15 PM	13,645 sf	15.66%	8,831 sf	10.14%	
3:30 PM	19,347 sf	22.21%	12,156 sf	13.95%	
3:45 PM	32,446 sf	37.24%	10,874 sf	12.48%	
3:51 PM	41,983 sf	48.19%	7,815 sf	8.97%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

DECEMBER 13

Mirror date: December 28
Analysis hours: 8:15 AM-3:52 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:15 AM	62,797 sf	72.08%	3,498 sf	4.02%	
8:30 AM	44,071 sf	50.59%	4,120 sf	4.73%	
8:45 AM	30,241 sf	34.71%	3,724 sf	4.27%	
9:00 AM	19,954 sf	22.90%	3,236 sf	3.71%	
9:15 AM	12,851 sf	14.75%	2,723 sf	3.13%	
9:30 AM	8,805 sf	10.11%	869 sf	1.00%	
9:45 AM	7,255 sf	8.33%	0 sf	0.00%	
10:00 AM	6,109 sf	7.01%	0 sf	0.00%	
10:15 AM	5,439 sf	6.24%	0 sf	0.00%	
10:30 AM	5,186 sf	5.95%	0 sf	0.00%	
10:45 AM	4,998 sf	5.74%	0 sf	0.00%	
11:00 AM	4,857 sf	5.58%	0 sf	0.00%	
11:15 AM	4,731 sf	5.43%	0 sf	0.00%	
11:30 AM	4,548 sf	5.22%	0 sf	0.00%	
11:45 AM	4,709 sf	5.40%	0 sf	0.00%	
12:00 PM	4,976 sf	5.71%	0 sf	0.00%	
12:15 PM	5,253 sf	6.03%	0 sf	0.00%	
12:30 PM	5,528 sf	6.35%	0 sf	0.00%	
12:45 PM	5,821 sf	6.68%	0 sf	0.00%	
1:00 PM	6,123 sf	7.03%	0 sf	0.00%	
1:15 PM	6,454 sf	7.41%	0 sf	0.00%	
1:30 PM	6,831 sf	7.84%	0 sf	0.00%	
1:45 PM	7,258 sf	8.33%	0 sf	0.00%	
2:00 PM	7,731 sf	8.87%	0 sf	0.00%	
2:15 PM	8,270 sf	9.49%	0 sf	0.00%	
2:30 PM	8,933 sf	10.25%	0 sf	0.00%	
2:45 PM	9,859 sf	11.32%	1,062 sf	1.22%	
3:00 PM	11,281 sf	12.95%	4,068 sf	4.67%	
3:15 PM	13,808 sf	15.85%	8,530 sf	9.79%	
3:30 PM	19,540 sf	22.43%	11,753 sf	13.49%	
3:45 PM	32,452 sf	37.25%	10,549 sf	12.11%	
3:52 PM	44,996 sf	51.65%	6,232 sf	7.15%	

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

DECEMBER 20

Winter solstice (December 21 similar)
Analysis hours: 8:19 AM-3:54 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

Analysis Time	EXISTING SHADOW		PROJECT NET NEW SHADOW		SHADOW/SUNLIGHT BALANCE
	Shadow Area	Coverage	Shadow Area	Coverage	Relative levels of Shadow vs. Sun
8:19 AM	63,052 sf	72.37%	3,457 sf	3.97%	
8:30 AM	49,142 sf	56.41%	4,080 sf	4.68%	
8:45 AM	34,003 sf	39.03%	3,810 sf	4.37%	
9:00 AM	22,611 sf	25.95%	3,341 sf	3.83%	
9:15 AM	14,836 sf	17.03%	2,875 sf	3.30%	
9:30 AM	9,679 sf	11.11%	1,488 sf	1.71%	
9:45 AM	7,787 sf	8.94%	0 sf	0.00%	
10:00 AM	6,454 sf	7.41%	0 sf	0.00%	
10:15 AM	5,621 sf	6.45%	0 sf	0.00%	
10:30 AM	5,229 sf	6.00%	0 sf	0.00%	
10:45 AM	5,039 sf	5.78%	0 sf	0.00%	
11:00 AM	4,883 sf	5.61%	0 sf	0.00%	
11:15 AM	4,765 sf	5.47%	0 sf	0.00%	
11:30 AM	4,623 sf	5.31%	0 sf	0.00%	
11:45 AM	4,656 sf	5.34%	0 sf	0.00%	
12:00 PM	4,923 sf	5.65%	0 sf	0.00%	
12:15 PM	5,200 sf	5.97%	0 sf	0.00%	
12:30 PM	5,472 sf	6.28%	0 sf	0.00%	
12:45 PM	5,762 sf	6.61%	0 sf	0.00%	
1:00 PM	6,064 sf	6.96%	0 sf	0.00%	
1:15 PM	6,389 sf	7.33%	0 sf	0.00%	
1:30 PM	6,753 sf	7.75%	0 sf	0.00%	
1:45 PM	7,175 sf	8.24%	0 sf	0.00%	
2:00 PM	7,635 sf	8.76%	0 sf	0.00%	
2:15 PM	8,165 sf	9.37%	0 sf	0.00%	
2:30 PM	8,816 sf	10.12%	0 sf	0.00%	
2:45 PM	9,715 sf	11.15%	772 sf	0.89%	
3:00 PM	11,060 sf	12.70%	3,478 sf	3.99%	
3:15 PM	13,417 sf	15.40%	7,731 sf	8.87%	
3:30 PM	18,450 sf	21.18%	11,434 sf	13.12%	
3:45 PM	30,188 sf	34.65%	10,821 sf	12.42%	
3:54 PM	46,296 sf	53.14%	5,558 sf	6.38%	

EXHIBIT E

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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November 14, 2025

Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

Subject: **Comments on the Family Zoning Plan – Housing Element Rezoning Program (SCH No. 2021060358)**

Dear Mr. Drury,

We have reviewed the September 2025 Addendum No. 1 to Environmental Impact Report ("Addendum") and the November 2022 Final Environmental Impact Report ("FEIR") for the Family Zoning Plan – Housing Element Rezoning Program ("Project") located in the City of San Francisco ("City"). The Addendum proposes to develop an additional 4,000 housing units to bring the total units under the Family Zoning Plan to 54,000 housing units.

Our review concludes that the Addendum fails to adequately evaluate the Project's hazards, hazardous materials, and air quality impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A subsequent Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential hazards, hazardous materials, and air quality impacts that the project may have on the environment.

Hazards and Hazardous Materials

Inadequate Disclosure and Analysis of Impacts

The Addendum and FEIR do not mention the newly passed AB 130 which mandates that hazardous waste sites be addressed through the completion of a Phase I Environmental Site Assessments ("ESAs"). AB 130 states: [1]

> "The development can proceed as a "use by right" if, [among other provisions],

[1] "Assembly Bill No. 130." California State Legislature, 2025, *available at:* https://legiscan.com/CA/text/AB130/id/3258333

(13) (A) The development proponent completes a Phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code, and a Phase II environmental assessment, as defined in subdivision (o) of Section 25403 of the Health and Safety Code, if warranted.

(B) If a recognized environmental condition is found, the development proponent shall undertake a preliminary endangerment assessment, as defined in Section 78095 of the Health and Safety Code, prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity.

(i) If a release of hazardous substance is found to exist on the site, the release shall be removed, or any significant effect of the release shall be mitigated to a level of insignificance in compliance with state and federal requirements.

(ii) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with current state and federal requirements."

These requirements are not mentioned in the Addendum or FEIR. There are thousands of hazardous waste sites in San Francisco. According to the FEIR, there are 2,000 Maher sites and 2,300 Cortese List sites within San Francisco (p. 4.1-219) [2]. All Maher- and Cortese-listed sites that will be subject to development under this Project will need to undergo a Phase I ESA according to the AB 130 text cited above.

Phase I ESAs are conducted to identify if any recognized environmental conditions are found that would potentially pose a health risk to construction workers or for future residents. If a recognized environmental condition is found, a more detailed preliminary endangerment assessment is required to identify any hazardous substance release.

A subsequent EIR should be prepared to include specific mitigation measures for dealing with Maher- and Cortese-listed sites in a manner consistent with AB 130. These mitigation measures must include provisions for conducting Phase I ESAs and, if recognized conditions are found, Phase II ESAs so that the health of construction workers, future occupants and workers is protected.

[2] The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with the California Environmental Quality Act requirements in providing information about the location of hazardous materials release sites. Government Code section 65962.5 requires the California Environmental Protection Agencyopens in a new window to develop at least annually an updated Cortese List. DTSC is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List. https://dtsc.ca.gov/dtscs-cortese-list/

Air Quality

Failure to Quantify and Adequately Evaluate Criteria Air Pollutant Emissions

The Addendum fails to quantify the criteria air pollutant emissions associated with Project construction and operation. Rather, in regard to the proposed Project's construction-related air quality impacts, the Addendum states:

> "The proposed rezoning program and subsequent development is expected to result in the same significant criteria air pollutant impacts from construction but not substantially more severe impacts than those disclosed in the EIR" (p. 93).

Similarly, in regard to the Project's operational air quality impacts, the Addendum states:

> "The conclusion in the FEIR is that total operational emissions for future development would be below the air district's thresholds of significance for all pollutants. That conclusion also applies to the proposed rezoning program. Operational emissions would not exceed any thresholds for any representative building type that would be constructed under the proposed rezoning program, and the impact would be less than significant" (p. 95).

However, relevant Bay Area Air Quality Management District ("BAAQMD") guidance supports the calculation of the Project's air pollutant emissions. The Addendum proposes to construct an additional 4,000 residential units. According to BAAQMD's screening criteria, apartments and condo-townhouse land uses must undergo further environmental review if they exceed 416 units for construction or 637/638 units for operational emissions (see table below).[3]

[3] "Screening For Criteria Air Pollutants and Precursors." BAAQMD, 2022, *available at*: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?la=en, p. 4.

Land Use Category	Land Use Subcategory	Land Use Unit	Screening Level	
			Construction	Operation
Education	Worship Place	KSF	452	642
Industrial	General Heavy Industry	KSF	452	1,009
Industrial	General Light Industry	KSF	452	998
Industrial	Industrial Park	KSF	452	1,247
Industrial	Manufacturing	KSF	452	1,009
Industrial	Warehouse[1]	KSF	452	1,423
Recreational	Arena	KSF	732	600
Recreational	City Park	Acres	10	175
Recreational	Fast Food Restaurant	KSF	452	21
Recreational	Health Club	KSF	452	261
Recreational	Hotel	Rooms	312	633
Recreational	Motel	Rooms	230	767
Recreational	Movie Theater	KSF	458	80
Recreational	Restaurant – High Turnover (Sit-Down)	KSF	452	75
Recreational	Restaurant – Quality (Fine Dining)	KSF	452	105
Recreational	Racquet Club	KSF	452	457
Recreational	Recreational Swimming Pool	KSF	452	376
Residential	Apartments	DU	416	638
Residential	Condo-Townhouse	DU	416	637
Residential	Mobile Home Park	DU	377	721
Residential	Congregate Care/Retirement Community	DU	416	1,008
Residential	Single Family Housing	DU	254	421
Retail	Auto Care Center	KSF	452	356
Retail	Convenience Market	KSF	452	11
Retail	Discount Store	KSF	452	150
Retail	Home Improvement Superstore/Hardware-Paint Store	KSF	452	221
Retail	Regional Shopping Center	KSF	452	221
Retail	Strip Mall	KSF	452	204
Retail	Supermarket	KSF	452	72

Notes: DU = dwelling unit; KSF = thousand square feet.

Furthermore, the BAAQMD indicates that if a Project includes any of the listed screening criteria, "then the lead agency would need to perform a detailed assessment of the project's criteria air pollutant and precursor emissions."[4] Thus, pursuant to relevant BAAQMD guidance, a quantitative air quality analysis should be prepared in a subsequent EIR.

Without making an effort to estimate the Project's potential construction-related and operational criteria air pollutant emissions, the Addendum lacks evidence to support the conclusion that the Project's emissions would not exceed the applicable BAAQMD significance thresholds. Until further analysis is provided, we cannot verify the Project would not result in new, significant air quality impacts already addressed in the FEIR. The Project should not be approved until a subsequent EIR is prepared to adequately assess and mitigate the potential air quality impacts that Project construction and operation may have on the surrounding environment.

SWAPE's Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to estimate construction-related and operational emissions that may result from development of the additional 4,000 housing units under the Addendum, we prepared a preliminary CalEEMod model. Our analysis provides a generalized evaluation of a range of potential residential building types. Specifically, we modeled accounting for 2,000 "Apartments Mid Rise" and 2,000

[4] "Screening For Criteria Air Pollutants and Precursors." BAAQMD, 2022, *available at*: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?la=en, p. 4.

"Condo/Townhouse High Rise" land use subtypes. Because Project-specific details such as construction schedule, equipment types, and operating parameters are not known at this time, all other values were left as default.

Our analysis estimates that the Project's construction and operational related reactive organic gases/volatile organic compounds ("ROG/VOC") emissions exceed the BAAQMD daily threshold of 54 pounds per day ("lbs/day") (see table below).

SWAPE Criteria Air Pollutant Emissions Estimates		
	Construction ROG/VOC (lbs/day)	**Operational ROG/VOC** (lbs/day)
SWAPE	148	145
BAAQMD Threshold	**54**	**54**
Exceeds?	***Yes***	***Yes***

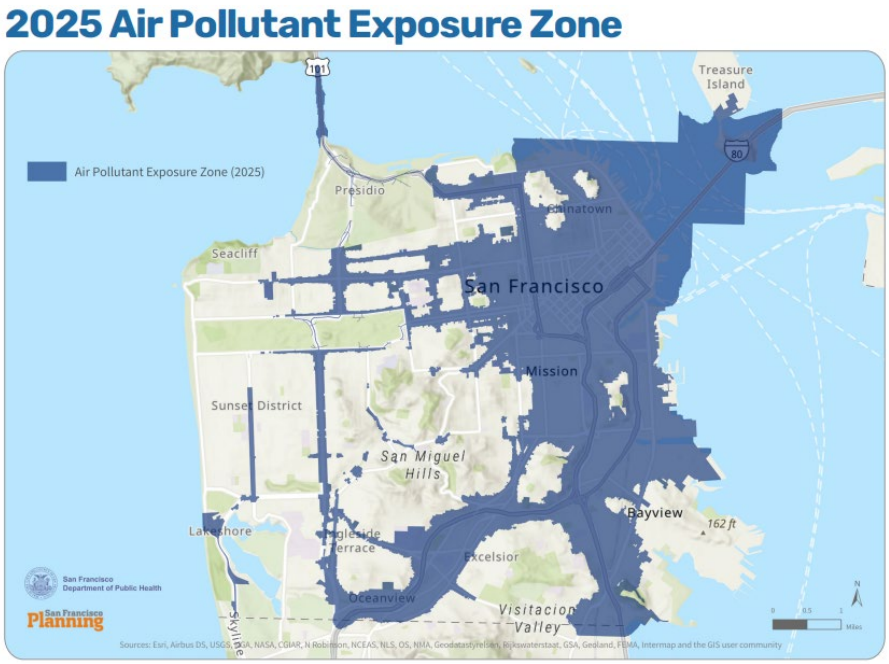
According to our analysis, the construction and operational related ROG/VOC emissions are estimated to be approximately 148 and 145 lbs/day, respectively, exceeding the BAAQMD daily threshold. This finding indicates a potentially significant air quality impact that the Addendum did not identify or address. In our opinion, a subsequent EIR should be conducted to provide a more substantial calculation of the Project's emissions and a more detailed evaluation of the Project's potential air quality impacts.

Failure to Adequately Account for Air Pollution Exposure Zones

The Addendum proposes development in the Downtown, Marina, Mission, Northeast, and Western Addition planning districts, which have areas within the City's air pollutant exposure zones ("APEZ"). The Addendum states that "the proposed rezoning program may result in a small proportion of additional rezoned parcels being in the APEZ, which could increase the number of people exposed to the generally high pollutant concentrations in the APEZ" (p. 97).

In 2025, the City identified new APEZ areas, defined as locations "where particulate matter ($PM_{2.5}$) is greater than or equal to 9 µg/m^3 or where the risk of cancer from air pollutants is greater than or equal to 100 in a million," and are displayed in the APEZ map presented below:[5]

[5] "2025 Air Pollutant Exposure Zone." San Francisco Department of Public Health, February 2025, available at: https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=216571d03e991ee3e00bc434a2415eb36eabc17a8f25a39dc8105f404b976d2f&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0.



According to the City:

> "Since 2008, San Francisco Health Code article 38 requires new residential construction projects in the APEZ to install enhanced ventilation in buildings to protect residents from the health effects of poor air quality. In addition, through the environmental review process, many construction projects in the APEZ are required to use the cleanest available construction equipment to reduce air quality impacts."[6][7]

As demonstrated above, residential projects are recommended to install enhanced ventilation in buildings. The Addendum and FEIR have failed to do so. Additionally, the Addendum concludes that the $PM_{2.5}$ and cancer risk impacts associated with the Project would be significant-and-unavoidable with mitigation, stating:

> "The maximum increases in $PM_{2.5}$ concentrations and cancer risks would not be meaningfully different than those found in the FEIR analysis, and the results would most likely still be above the air district's thresholds and thus significant and unavoidable with mitigation" (p. 97).

While we agree that the Project would result in significant air quality impacts, the Addendum's assertion that this impact is significant-and-unavoidable is unsupported. The Project proposed by the Addendum would allow further residential development within newly designated APEZ areas, which are already characterized by elevated $PM_{2.5}$ levels and an increased cancer risk. By facilitating new housing in these

[6] "Air Quality Review." San Francisco Planning, 2025, *available at:* https://sfplanning.org/air-quality#permit-anchor-3.
[7] "ARTICLE 38: Enhanced Ventilation for Urban Infill." City and County of San Francisco, December 2008, *available at: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_health/0-0-0-6054*.

areas without committing to additional mitigation, the Addendum could expose future residents to potentially significant health impacts. According to CEQA Guidelines §15096(g)(2):

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."[8]

As such, the Addendum is required under CEQA to implement all feasible mitigation to reduce impacts to a less-than-significant level. To reduce the Project's air quality impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions." The Project should not be approved until a subsequent EIR is prepared, incorporating all feasible mitigation to reduce emissions to the maximum extent possible.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

The Addendum is required under CEQA to implement all feasible mitigation to reduce the Project's potential impacts. As demonstrated above, the Project would result in potentially significant air quality impacts that should be mitigated further.

To reduce the VOC emissions associated with Project construction and operation, we recommend the Addendum consider incorporating the following mitigation measures:[9]

- Use super-compliant VOC-content architectural coatings (0 grams per liter to less than 10 grams per liter VOC) during Project construction application of paints and other architectural coatings.
- If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, or they do not reduce emissions to below thresholds, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September.

While the Project is not located in Los Angeles County, the above mitigation measures would decrease emissions regardless. Further mitigation used by other land use development projects to address VOC emissions include:[10]

[8] "Cal. Code Regs. tit. 14 § 15096." California Legislature, available at: https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-7-eir-process/section-15096-process-for-a-responsible-agency.

[9] "Mitigation Monitoring and Reporting Program." Los Angeles County Housing Element Update Program EIR. August 2021, *available at*: https://planning.lacounty.gov/wp-content/uploads/2023/07/Housing_final-peir-mitigation-monitoring.pdf.

[10] "Banning Commerce Center Project." Kimley-Horn and Associates, Inc., June 2024, *available at*: https://ceqanet.opr.ca.gov/2022090102/2; Draft Environmental Impact Report, p. 1-7.

- Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain
- Use compliant low-VOC cleaning solvents to clean paint application equipment.
- Keep all paint- and solvent-laden rags in sealed containers to prevent VOC emissions.
- Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable.
- Use high-pressure/low-volume paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.
- Manual application using a paintbrush, hand-roller, trowel, spatula, dauber, rag, or sponge, to achieve a 100 percent application efficiency.

In order to reduce the $PM_{2.5}$ and cancer risk emissions associated with the Project and recommend the Addendum consider incorporating several mitigation measures as listed below. Incorporating these measures would also reduce cumulative exposure for future residential developments proposed within APEZ zones, where pollutant concentrations are already elevated. The Southern California Association of Governments' Certified Final Program Environmental Impact Report for Connect SoCal 2024 recommends the following Project-level air quality mitigation measures: [11]

- Installing high-efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.
- Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.
- Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
- Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
- Set criteria for assessing progress in installing and replacing the enhanced filtration units,
- Develop a process for evaluating the effectiveness of the enhanced filtration units.
- Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.

[11] "Certified Final Program Environmental Impact Report for Connect SoCal 2024." SCAG, May 2020, *available at:* https://scag.ca.gov/program-environmental-impact-report-0.

- Establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
- Obtain CARB Portable Equipment Registration with the state or a local district permit for portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles. Arrange appropriate consultations with CARB or the local air district to determine registration and permitting requirements prior to equipment operation at the site.
- Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, parks and public spaces, minimize pedestrian barriers.
- Create urban non-motorized zones.
- Provide bike parking in non-residential and multi-unit residential projects
- Require residential area parking permit.
- Provide ride-sharing programs:
    - Designate a certain percentage of parking spacing for ride sharing vehicles,
    - Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles,
    - Providing a web site or messaging board for coordinating rides, and
    - Permanent transportation management association membership and finding requirement.

Provided above are several mitigation measures that would reduce Project-related VOC and $PM_{2.5}$/cancer risk emissions. These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduces emissions released during Project construction and operation.

A subsequent EIR should be prepared that includes all feasible mitigation measures, as well as an updated air quality analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The subsequent EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited documentation regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was

reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: CalEEMod Output Files
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Attachment A

San Francisco Housing Element Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	San Francisco Housing Element
Construction Start Date	1/1/2026
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	3.9
Precipitation (days)	42
Location	San Francisco, CA, USA
County	San Francisco
City	San Francisco
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1047
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.32

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	2,000	Dwelling Unit	53	1,920,000	—	—	4,660	—

Condo/Townhouse High Rise	2,000	Dwelling Unit	31	1,920,000	—	—	4,660	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	493	493	33	121	0.10	1.2	27	27	1.1	10	11	—	39,740	39,740	2.1	2.0	105	40,504
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	493	493	35	113	0.10	1.1	27	27	1.0	6.5	6.9	—	38,384	38,384	2.3	2.8	2.7	39,270
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	148	148	23	76	0.07	0.74	19	19	0.68	4.5	4.8	—	26,971	26,971	1.5	1.6	29	27,454
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	27	27	4.2	14	0.01	0.14	3.4	3.5	0.12	0.83	0.87	—	4,465	4,465	0.25	0.26	4.8	4,545

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.8	3.2	29	29	0.06	1.2	20	21	1.1	10	11	—	6,776	6,776	0.27	0.05	0.62	6,799
2027	11	8.6	33	121	0.10	0.42	27	27	0.39	6.5	6.9	—	39,740	39,740	2.1	2.0	105	40,504
2028	11	8.4	31	116	0.10	0.38	27	27	0.36	6.5	6.8	—	38,945	38,945	2.1	1.9	94	39,672
2029	11	8.1	29	111	0.10	0.35	27	27	0.33	6.5	6.8	—	38,138	38,138	1.9	1.9	84	38,850
2030	9.5	7.8	28	107	0.10	0.34	27	27	0.32	6.5	6.8	—	37,342	37,342	1.8	1.9	74	38,018
2031	9.2	7.6	26	104	0.10	0.32	27	27	0.30	6.5	6.8	—	36,693	36,693	1.7	1.8	65	37,333
2032	8.9	7.4	24	101	0.10	0.30	27	27	0.29	6.5	6.8	—	35,954	35,954	1.6	1.8	57	36,583
2033	493	493	5.9	16	0.01	0.18	4.8	4.8	0.17	1.1	1.1	—	4,730	4,730	0.06	0.04	7.6	4,750
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.7	3.1	27	28	0.06	1.1	9.4	10	1.0	3.7	4.7	—	6,766	6,766	0.27	0.06	0.02	6,791
2027	11	8.5	35	113	0.10	1.0	27	27	0.96	6.5	6.9	—	38,384	38,384	2.3	2.8	2.7	39,270
2028	11	8.2	33	108	0.10	0.38	27	27	0.36	6.5	6.8	—	37,614	37,614	2.1	2.7	2.4	38,471
2029	11	7.8	31	104	0.10	0.35	27	27	0.33	6.5	6.8	—	36,830	36,830	2.0	2.7	2.2	37,685
2030	9.5	7.7	29	100	0.10	0.34	27	27	0.32	6.5	6.8	—	36,055	36,055	2.0	1.9	1.9	36,663
2031	9.1	7.4	27	97	0.10	0.32	27	27	0.30	6.5	6.8	—	35,418	35,418	1.7	1.8	1.7	35,996
2032	8.8	7.3	26	93	0.10	0.30	27	27	0.29	6.5	6.8	—	34,697	34,697	1.6	1.8	1.5	35,273
2033	493	493	25	90	0.10	0.28	27	27	0.27	6.5	6.8	—	34,007	34,007	1.5	1.7	1.3	34,556
2034	493	493	1.5	14	< 0.005	0.01	4.8	4.8	0.01	1.1	1.1	—	4,430	4,430	0.07	0.04	0.17	4,443
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.4	2.0	18	18	0.03	0.74	5.8	6.6	0.68	2.7	3.4	—	3,709	3,709	0.15	0.03	0.17	3,723
2027	6.8	5.1	23	66	0.07	0.39	16	17	0.37	4.1	4.5	—	22,553	22,553	1.3	1.6	25	23,076
2028	7.8	5.8	23	76	0.07	0.27	19	19	0.25	4.5	4.8	—	26,971	26,971	1.5	1.4	29	27,454
2029	7.5	5.6	22	73	0.07	0.25	19	19	0.24	4.5	4.7	—	26,337	26,337	1.4	1.4	26	26,813
2030	6.7	5.5	20	69	0.07	0.24	19	19	0.23	4.5	4.7	—	25,782	25,782	1.4	1.3	23	26,237

2031	6.4	5.2	19	67	0.07	0.23	19	19	0.22	4.5	4.7	—	25,327	25,327	1.2	1.3	20	25,759
2032	6.2	5.2	19	65	0.07	0.22	19	19	0.20	4.5	4.7	—	24,879	24,879	1.1	1.3	17	25,307
2033	148	148	5.0	17	0.02	0.09	4.4	4.5	0.08	1.0	1.1	—	5,689	5,689	0.21	0.21	3.4	5,760
2034	2.9	2.9	0.01	0.08	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	26	26	< 0.005	< 0.005	0.02	26
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.43	0.37	3.3	3.3	0.01	0.14	1.1	1.2	0.12	0.49	0.61	—	614	614	0.02	0.01	0.03	616
2027	1.2	0.93	4.2	12	0.01	0.07	2.9	3.0	0.07	0.75	0.82	—	3,734	3,734	0.21	0.26	4.2	3,820
2028	1.4	1.1	4.2	14	0.01	0.05	3.4	3.5	0.05	0.83	0.87	—	4,465	4,465	0.25	0.23	4.8	4,545
2029	1.4	1.0	4.0	13	0.01	0.05	3.4	3.5	0.04	0.82	0.87	—	4,360	4,360	0.23	0.23	4.3	4,439
2030	1.2	1.00	3.7	13	0.01	0.04	3.4	3.5	0.04	0.82	0.86	—	4,269	4,269	0.22	0.22	3.8	4,344
2031	1.2	0.95	3.5	12	0.01	0.04	3.4	3.5	0.04	0.82	0.86	—	4,193	4,193	0.20	0.21	3.3	4,265
2032	1.1	0.94	3.4	12	0.01	0.04	3.4	3.5	0.04	0.83	0.86	—	4,119	4,119	0.19	0.21	2.9	4,190
2033	27	27	0.91	3.1	< 0.005	0.02	0.80	0.82	0.02	0.19	0.21	—	942	942	0.03	0.03	0.56	954
2034	0.53	0.53	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.3	4.3	< 0.005	< 0.005	< 0.005	4.3

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	167	161	70	547	1.1	4.3	82	86	4.2	21	25	1,819	147,054	148,873	189	3.7	35	154,742
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	146	141	71	313	1.0	4.2	82	86	4.2	21	25	1,819	143,053	144,872	189	4.0	28	150,827
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	149	145	31	386	0.75	1.1	76	77	1.1	19	20	1,819	90,932	92,751	188	3.7	31	98,577

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	27	27	5.7	70	0.14	0.20	14	14	0.20	3.5	3.7	301	15,055	15,356	31	0.61	5.1	16,321

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	44	41	19	298	0.75	0.27	82	82	0.25	21	21	—	76,997	76,997	3.1	2.9	7.6	77,951
Area	122	119	42	245	0.26	3.3	—	3.3	3.3	—	3.3	0.00	50,720	50,720	0.97	0.10	—	50,774
Energy	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	18,912	18,912	2.2	0.17	—	19,019
Water	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Total	167	161	70	547	1.1	4.3	82	86	4.2	21	25	1,819	147,054	148,873	189	3.7	35	154,742
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	44	41	23	293	0.72	0.27	82	82	0.25	21	21	—	73,602	73,602	3.4	3.2	0.20	74,645
Area	102	99	39	17	0.25	3.2	—	3.2	3.2	—	3.2	0.00	50,113	50,113	0.94	0.09	—	50,165
Energy	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	18,912	18,912	2.2	0.17	—	19,019
Water	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Total	146	141	71	313	1.0	4.2	82	86	4.2	21	25	1,819	143,053	144,872	189	4.0	28	150,827
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	41	38	21	269	0.69	0.26	76	76	0.24	19	20	—	70,060	70,060	3.1	3.0	3.1	71,022

Area	107	107	2.0	113	0.01	0.13	—	0.13	0.12	—	0.12	0.00	1,535	1,535	0.04	< 0.005	—	1,537
Energy	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	18,912	18,912	2.2	0.17	—	19,019
Water	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Total	149	145	31	386	0.75	1.1	76	77	1.1	19	20	1,819	90,932	92,751	188	3.7	31	98,577
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.5	7.0	3.7	49	0.13	0.05	14	14	0.04	3.5	3.6	—	11,599	11,599	0.51	0.49	0.52	11,759
Area	20	19	0.37	21	< 0.005	0.02	—	0.02	0.02	—	0.02	0.00	254	254	0.01	< 0.005	—	255
Energy	0.19	0.09	1.6	0.69	0.01	0.13	—	0.13	0.13	—	0.13	—	3,131	3,131	0.37	0.03	—	3,149
Water	—	—	—	—	—	—	—	—	—	—	—	37	70	108	3.8	0.09	—	231
Waste	—	—	—	—	—	—	—	—	—	—	—	264	0.00	264	26	0.00	—	923
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4.6	4.6
Total	27	27	5.7	70	0.14	0.20	14	14	0.20	3.5	3.7	301	15,055	15,356	31	0.61	5.1	16,321

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.7	2.3	21	19	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.7	2.3	21	19	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.75	0.63	5.7	5.2	0.01	0.23	—	0.23	0.21	—	0.21	—	939	939	0.04	0.01	—	942
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	1.0	0.95	< 0.005	0.04	—	0.04	0.04	—	0.04	—	155	155	0.01	< 0.005	—	156
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.04	0.04	0.03	0.52	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	133	133	< 0.005	< 0.005	0.46	134
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.47	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	126	126	< 0.005	< 0.005	0.01	127
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	34	34	< 0.005	< 0.005	0.05	35
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.7	5.7	< 0.005	< 0.005	0.01	5.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.7	3.1	29	29	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316

Dust From Material Movement	—	—	—	—	—	—	20	20	—	10	10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	4.8	4.7	0.01	0.20	—	0.20	0.19	—	0.19	—	871	871	0.04	0.01	—	874
Dust From Material Movement	—	—	—	—	—	—	3.2	3.2	—	1.7	1.7	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.87	0.86	< 0.005	0.04	—	0.04	0.03	—	0.03	—	144	144	0.01	< 0.005	—	145
Dust From Material Movement	—	—	—	—	—	—	0.59	0.59	—	0.30	0.30	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.03	0.61	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	155	155	< 0.005	< 0.005	0.54	156

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	24	24	< 0.005	< 0.005	0.04	24
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.0	4.0	< 0.005	< 0.005	0.01	4.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.6	3.0	27	28	0.06	1.1	—	1.1	1.0	—	1.0	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.2	9.2	—	3.7	3.7	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.6	3.0	27	28	0.06	1.1	—	1.1	1.0	—	1.0	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.2	9.2	—	3.7	3.7	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.99	0.83	7.4	7.5	0.02	0.31	—	0.31	0.28	—	0.28	—	1,795	1,795	0.07	0.01	—	1,801
Dust From Material Movement	—	—	—	—	—	—	2.5	2.5	—	0.99	0.99	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.4	1.4	< 0.005	0.06	—	0.06	0.05	—	0.05	—	297	297	0.01	< 0.005	—	298
Dust From Material Movement	—	—	—	—	—	—	0.46	0.46	—	0.18	0.18	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.04	0.69	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	177	177	< 0.005	< 0.005	0.62	178
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.04	0.63	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	168	168	< 0.005	0.01	0.02	170
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.17	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	46	46	< 0.005	< 0.005	0.07	46
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.6	7.6	< 0.005	< 0.005	0.01	7.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Grading (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.5	2.9	26	27	0.06	1.0	—	1.0	0.96	—	0.96	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.2	9.2	—	3.7	3.7	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.54	0.46	4.0	4.2	0.01	0.16	—	0.16	0.15	—	0.15	—	1,020	1,020	0.04	0.01	—	1,024
Dust From Material Movement	—	—	—	—	—	—	1.4	1.4	—	0.56	0.56	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.72	0.77	< 0.005	0.03	—	0.03	0.03	—	0.03	—	169	169	0.01	< 0.005	—	169
Dust From Material Movement	—	—	—	—	—	—	0.26	0.26	—	0.10	0.10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.04	0.60	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	165	165	< 0.005	0.01	0.01	167
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	25	25	< 0.005	< 0.005	0.04	26
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.2	4.2	< 0.005	< 0.005	0.01	4.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.69	0.58	5.3	7.2	0.01	0.19	—	0.19	0.17	—	0.17	—	1,342	1,342	0.05	0.01	—	1,346
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.96	1.3	< 0.005	0.03	—	0.03	0.03	—	0.03	—	222	222	0.01	< 0.005	—	223
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	8.0	7.2	5.2	94	0.00	0.00	24	24	0.00	5.6	5.6	—	25,057	25,057	0.38	0.19	80	25,204
Vendor	2.2	0.40	19	14	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	12,286	12,286	1.7	1.8	25	12,895
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	8.0	7.1	6.3	86	0.00	0.00	24	24	0.00	5.6	5.6	—	23,705	23,705	0.51	0.93	2.1	23,998

Vendor	2.2	0.39	20	14	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	12,282	12,282	1.7	1.8	0.65	12,866
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.4	3.8	3.0	47	0.00	0.00	13	13	0.00	3.0	3.0	—	13,291	13,291	0.25	0.52	19	13,472
Vendor	1.2	0.22	11	7.8	0.04	0.04	1.7	1.8	0.04	0.50	0.54	—	6,875	6,875	0.93	1.0	6.1	7,208
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.80	0.70	0.55	8.5	0.00	0.00	2.4	2.4	0.00	0.55	0.55	—	2,200	2,200	0.04	0.09	3.2	2,230
Vendor	0.22	0.04	2.0	1.4	0.01	0.01	0.32	0.33	0.01	0.09	0.10	—	1,138	1,138	0.15	0.17	1.0	1,193
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.99	8.9	13	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.99	8.9	13	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.4	9.3	0.02	0.22	—	0.22	0.20	—	0.20	—	1,717	1,717	0.07	0.01	—	1,723
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.2	1.7	< 0.005	0.04	—	0.04	0.04	—	0.04	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	7.9	7.0	4.4	90	0.00	0.00	24	24	0.00	5.6	5.6	—	24,628	24,628	0.38	0.19	72	24,767
Vendor	2.0	0.40	17	14	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,919	11,919	1.6	1.7	23	12,499
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	7.8	6.8	5.5	81	0.00	0.00	24	24	0.00	5.6	5.6	—	23,300	23,300	0.44	0.93	1.9	23,591
Vendor	2.0	0.38	18	14	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,916	11,916	1.6	1.7	0.58	12,475
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	5.5	4.8	3.8	57	0.00	0.00	17	17	0.00	3.9	3.9	—	16,718	16,718	0.32	0.14	22	16,789
Vendor	1.4	0.28	13	9.7	0.06	0.06	2.2	2.3	0.06	0.64	0.70	—	8,536	8,536	1.1	1.2	7.0	8,943

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.00	0.88	0.70	10	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,768	2,768	0.05	0.02	3.7	2,780
Vendor	0.26	0.05	2.3	1.8	0.01	0.01	0.41	0.42	0.01	0.12	0.13	—	1,413	1,413	0.19	0.21	1.2	1,481
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Building Construction (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.97	8.6	13	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.97	8.6	13	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.82	0.69	6.1	9.2	0.02	0.20	—	0.20	0.18	—	0.18	—	1,712	1,712	0.07	0.01	—	1,718

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.1	1.7	< 0.005	0.04	—	0.04	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	7.6	6.8	4.4	85	0.00	0.00	24	24	0.00	5.6	5.6	—	24,223	24,223	0.32	0.19	64	24,352
Vendor	1.9	0.32	16	13	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,518	11,518	1.5	1.7	20	12,093
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	7.6	6.6	5.4	78	0.00	0.00	24	24	0.00	5.6	5.6	—	22,917	22,917	0.44	0.93	1.7	23,208
Vendor	1.9	0.30	17	13	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,517	11,517	1.5	1.7	0.51	12,073
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	5.3	4.7	3.8	54	0.00	0.00	17	17	0.00	3.9	3.9	—	16,398	16,398	0.27	0.14	20	16,465
Vendor	1.4	0.21	12	9.4	0.06	0.06	2.2	2.3	0.06	0.64	0.70	—	8,227	8,227	1.1	1.2	6.1	8,630
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.97	0.86	0.69	9.9	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,715	2,715	0.05	0.02	3.3	2,726
Vendor	0.25	0.04	2.1	1.7	0.01	0.01	0.40	0.41	0.01	0.12	0.13	—	1,362	1,362	0.18	0.21	1.0	1,429
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Building Construction (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.94	8.4	13	0.02	0.26	—	0.26	0.24	—	0.24	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.94	8.4	13	0.02	0.26	—	0.26	0.24	—	0.24	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.80	0.67	6.0	9.2	0.02	0.19	—	0.19	0.17	—	0.17	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	1.1	1.7	< 0.005	0.03	—	0.03	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.6	6.5	4.3	82	0.00	0.00	24	24	0.00	5.6	5.6	—	23,839	23,839	0.32	0.19	57	23,961
Vendor	1.7	0.31	15	13	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,106	11,106	1.4	1.7	17	11,653
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.6	6.5	5.4	74	0.00	0.00	24	24	0.00	5.6	5.6	—	22,553	22,553	0.44	0.19	1.5	22,622
Vendor	1.7	0.30	16	13	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	11,105	11,105	1.4	1.7	0.45	11,636
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.7	4.6	3.2	51	0.00	0.00	17	17	0.00	3.9	3.9	—	16,138	16,138	0.27	0.14	18	16,203
Vendor	1.2	0.21	11	9.1	0.06	0.06	2.2	2.3	0.06	0.64	0.70	—	7,932	7,932	1.0	1.2	5.4	8,316
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.85	0.83	0.59	9.3	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,672	2,672	0.05	0.02	2.9	2,683
Vendor	0.23	0.04	2.0	1.7	0.01	0.01	0.40	0.41	0.01	0.12	0.13	—	1,313	1,313	0.17	0.20	0.89	1,377
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Building Construction (2031) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.92	8.1	13	0.02	0.24	—	0.24	0.22	—	0.22	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.92	8.1	13	0.02	0.24	—	0.24	0.22	—	0.22	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.78	0.66	5.8	9.2	0.02	0.17	—	0.17	0.16	—	0.16	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.1	1.7	< 0.005	0.03	—	0.03	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	6.5	6.3	3.5	79	0.00	0.00	24	24	0.00	5.6	5.6	—	23,605	23,605	0.32	0.19	50	23,720
Vendor	1.6	0.31	14	12	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	10,691	10,691	1.2	1.6	15	11,208
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.3	6.2	4.6	72	0.00	0.00	24	24	0.00	5.6	5.6	—	22,330	22,330	0.38	0.19	1.3	22,397
Vendor	1.6	0.30	15	12	0.08	0.08	3.2	3.3	0.08	0.91	0.99	—	10,692	10,692	1.2	1.6	0.39	11,194
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.5	4.3	3.2	49	0.00	0.00	17	17	0.00	3.9	3.9	—	15,978	15,978	0.27	0.14	15	16,041
Vendor	1.2	0.21	10	8.8	0.06	0.06	2.2	2.3	0.06	0.64	0.70	—	7,637	7,637	0.89	1.1	4.6	8,000
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.82	0.79	0.58	9.0	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,645	2,645	0.05	0.02	2.6	2,656
Vendor	0.21	0.04	1.9	1.6	0.01	0.01	0.40	0.41	0.01	0.12	0.13	—	1,264	1,264	0.15	0.19	0.76	1,324
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.19. Building Construction (2032) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.90	7.9	13	0.02	0.22	—	0.22	0.21	—	0.21	—	2,397	2,397	0.10	0.02	—	2,405

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	0.90	7.9	13	0.02	0.22	—	0.22	0.21	—	0.21	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.77	0.64	5.6	9.2	0.02	0.16	—	0.16	0.15	—	0.15	—	1,717	1,717	0.07	0.01	—	1,723
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.0	1.7	< 0.005	0.03	—	0.03	0.03	—	0.03	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.3	6.2	3.5	76	0.00	0.00	24	24	0.00	5.6	5.6	—	23,278	23,278	0.32	0.19	44	23,387
Vendor	1.5	0.31	13	12	0.08	0.08	3.1	3.2	0.08	0.91	0.99	—	10,279	10,279	1.2	1.6	13	10,791
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	6.3	6.1	4.5	68	0.00	0.00	24	24	0.00	5.6	5.6	—	22,020	22,020	0.38	0.19	1.1	22,087
Vendor	1.5	0.30	14	12	0.08	0.08	3.1	3.2	0.08	0.91	0.99	—	10,280	10,280	1.2	1.6	0.33	10,780
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.4	4.3	3.2	47	0.00	0.00	17	17	0.00	3.9	3.9	—	15,800	15,800	0.23	0.14	14	15,860
Vendor	1.1	0.21	9.7	8.5	0.06	0.06	2.2	2.2	0.06	0.64	0.70	—	7,363	7,363	0.83	1.1	3.9	7,725
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.80	0.79	0.58	8.7	0.00	0.00	3.0	3.0	0.00	0.71	0.71	—	2,616	2,616	0.04	0.02	2.2	2,626
Vendor	0.19	0.04	1.8	1.6	0.01	0.01	0.40	0.41	0.01	0.12	0.13	—	1,219	1,219	0.14	0.19	0.65	1,279
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.21. Building Construction (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.0	0.88	7.7	13	0.02	0.20	—	0.20	0.19	—	0.19	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.12	0.10	0.87	1.5	< 0.005	0.02	—	0.02	0.02	—	0.02	—	272	272	0.01	< 0.005	—	273
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.16	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	45	45	< 0.005	< 0.005	—	45
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	6.1	5.9	4.4	66	0.00	0.00	24	24	0.00	5.6	5.6	—	21,738	21,738	0.38	0.19	0.99	21,805
Vendor	1.4	0.30	13	12	0.08	0.08	3.1	3.2	0.08	0.91	0.99	—	9,872	9,872	1.1	1.5	0.28	10,347
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.68	0.67	0.41	7.3	0.00	0.00	2.6	2.6	0.00	0.62	0.62	—	2,472	2,472	0.04	0.02	1.9	2,481
Vendor	0.16	0.03	1.4	1.3	0.01	0.01	0.34	0.35	0.01	0.10	0.11	—	1,120	1,120	0.12	0.17	0.52	1,175
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.12	0.08	1.3	0.00	0.00	0.48	0.48	0.00	0.11	0.11	—	409	409	0.01	< 0.005	0.31	411
Vendor	0.03	0.01	0.26	0.24	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	185	185	0.02	0.03	0.09	194
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.23. Paving (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.70	0.59	5.9	9.8	0.01	0.18	—	0.18	0.17	—	0.17	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.70	0.59	5.9	9.8	0.01	0.18	—	0.18	0.17	—	0.17	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.18	1.8	3.0	< 0.005	0.06	—	0.06	0.05	—	0.05	—	455	455	0.02	< 0.005	—	457
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.04	0.03	0.33	0.54	< 0.005	0.01	—	0.01	0.01	—	0.01	—	75	75	< 0.005	< 0.005	—	76
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.38	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	120	120	< 0.005	< 0.005	0.20	120
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.34	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	113	113	< 0.005	< 0.005	0.01	114
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	34	34	< 0.005	< 0.005	0.03	34
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.7	5.7	< 0.005	< 0.005	< 0.005	5.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.25. Architectural Coating (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.76	1.1	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	492	492	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.76	1.1	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	492	492	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.23	0.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	40	40	< 0.005	< 0.005	—	40

Architectural Coating	146	146	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.6	6.6	< 0.005	< 0.005	—	6.6
Architectural Coatings	27	27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.2	1.2	0.69	15	0.00	0.00	4.8	4.8	0.00	1.1	1.1	—	4,596	4,596	0.05	0.04	7.6	4,616
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.2	1.2	0.89	13	0.00	0.00	4.8	4.8	0.00	1.1	1.1	—	4,348	4,348	0.08	0.04	0.20	4,361
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.36	0.35	0.22	3.8	0.00	0.00	1.4	1.4	0.00	0.32	0.32	—	1,296	1,296	0.02	0.01	0.98	1,300
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.69	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	214	214	< 0.005	< 0.005	0.16	215
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.27. Architectural Coating (2034) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.76	1.1	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	492	492	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.78	0.78	< 0.005	< 0.005	—	0.79
Architectural Coatings	2.9	2.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.13	0.13	< 0.005	< 0.005	—	0.13
Architectural Coatings	0.53	0.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.2	1.1	0.74	13	0.00	0.00	4.8	4.8	0.00	1.1	1.1	—	4,296	4,296	0.06	0.04	0.17	4,309
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.07	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	25	25	< 0.005	< 0.005	0.02	25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.2	4.2	< 0.005	< 0.005	< 0.005	4.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	22	20	9.7	149	0.38	0.13	41	41	0.13	10	11	—	38,498	38,498	1.5	1.5	3.8	38,975
Condo/Townhouse High Rise	22	20	9.7	149	0.38	0.13	41	41	0.13	10	11	—	38,498	38,498	1.5	1.5	3.8	38,975
Total	44	41	19	298	0.75	0.27	82	82	0.25	21	21	—	76,997	76,997	3.1	2.9	7.6	77,951
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	22	20	11	146	0.36	0.13	41	41	0.13	10	11	—	36,801	36,801	1.7	1.6	0.10	37,323
Condo/Townhouse High Rise	22	20	11	146	0.36	0.13	41	41	0.13	10	11	—	36,801	36,801	1.7	1.6	0.10	37,323
Total	44	41	23	293	0.72	0.27	82	82	0.25	21	21	—	73,602	73,602	3.4	3.2	0.20	74,645
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	3.7	3.5	1.9	25	0.06	0.02	6.9	7.0	0.02	1.8	1.8	—	5,800	5,800	0.26	0.25	0.26	5,879
Condo/Townhouse High Rise	3.7	3.5	1.9	25	0.06	0.02	6.9	7.0	0.02	1.8	1.8	—	5,800	5,800	0.26	0.25	0.26	5,879
Total	7.5	7.0	3.7	49	0.13	0.05	14	14	0.04	3.5	3.6	—	11,599	11,599	0.51	0.49	0.52	11,759

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	3,813	3,813	0.62	0.07	—	3,851
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	3,813	3,813	0.62	0.07	—	3,851
Total	—	—	—	—	—	—	—	—	—	—	—	—	7,626	7,626	1.2	0.15	—	7,701
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	3,813	3,813	0.62	0.07	—	3,851

Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	3,813	3,813	0.62	0.07	—	3,851
Total	—	—	—	—	—	—	—	—	—	—	—	—	7,626	7,626	1.2	0.15	—	7,701
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	631	631	0.10	0.01	—	638
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	631	631	0.10	0.01	—	638
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,263	1,263	0.20	0.02	—	1,275

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.52	0.26	4.4	1.9	0.03	0.36	—	0.36	0.36	—	0.36	—	5,643	5,643	0.50	0.01	—	5,659
Condo/Townhouse High Rise	0.52	0.26	4.4	1.9	0.03	0.36	—	0.36	0.36	—	0.36	—	5,643	5,643	0.50	0.01	—	5,659
Total	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	11,286	11,286	1.00	0.02	—	11,318
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	0.52	0.26	4.4	1.9	0.03	0.36	—	0.36	0.36	—	0.36	—	5,643	5,643	0.50	0.01	—	5,659
Condo/Townhouse High Rise	0.52	0.26	4.4	1.9	0.03	0.36	—	0.36	0.36	—	0.36	—	5,643	5,643	0.50	0.01	—	5,659
Total	1.0	0.52	8.9	3.8	0.06	0.72	—	0.72	0.72	—	0.72	—	11,286	11,286	1.00	0.02	—	11,318
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.09	0.05	0.81	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	934	934	0.08	< 0.005	—	937
Condo/Townhouse High Rise	0.09	0.05	0.81	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	934	934	0.08	< 0.005	—	937
Total	0.19	0.09	1.6	0.69	0.01	0.13	—	0.13	0.13	—	0.13	—	1,869	1,869	0.17	< 0.005	—	1,874

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.6	2.3	39	17	0.25	3.2	—	3.2	3.2	—	3.2	0.00	50,113	50,113	0.94	0.09	—	50,165
Consumer Products	82	82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coating	15	15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	21	20	2.1	228	0.01	0.10	—	0.10	0.08	—	0.08	—	607	607	0.03	0.01	—	609
Total	122	119	42	245	0.26	3.3	—	3.3	3.3	—	3.3	0.00	50,720	50,720	0.97	0.10	—	50,774
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.6	2.3	39	17	0.25	3.2	—	3.2	3.2	—	3.2	0.00	50,113	50,113	0.94	0.09	—	50,165
Consumer Products	82	82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	15	15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	102	99	39	17	0.25	3.2	—	3.2	3.2	—	3.2	0.00	50,113	50,113	0.94	0.09	—	50,165
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.02	0.01	0.18	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	205	205	< 0.005	< 0.005	—	205
Consumer Products	15	15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	2.7	2.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.9	1.8	0.19	21	< 0.005	0.01	—	0.01	0.01	—	0.01	—	50	50	< 0.005	< 0.005	—	50
Total	20	19	0.37	21	< 0.005	0.02	—	0.02	0.02	—	0.02	0.00	254	254	0.01	< 0.005	—	255

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	112	212	325	12	0.28	—	697
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	112	212	325	12	0.28	—	697
Total	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	112	212	325	12	0.28	—	697
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	112	212	325	12	0.28	—	697
Total	—	—	—	—	—	—	—	—	—	—	—	225	425	650	23	0.56	—	1,394
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	19	35	54	1.9	0.05	—	115

Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	19	35	54	1.9	0.05	—	115
Total	—	—	—	—	—	—	—	—	—	—	—	37	70	108	3.8	0.09	—	231

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	797	0.00	797	80	0.00	—	2,789
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	797	0.00	797	80	0.00	—	2,789
Total	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	797	0.00	797	80	0.00	—	2,789
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	797	0.00	797	80	0.00	—	2,789
Total	—	—	—	—	—	—	—	—	—	—	—	1,594	0.00	1,594	159	0.00	—	5,577

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	132	0.00	132	13	0.00	—	462
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	132	0.00	132	13	0.00	—	462
Total	—	—	—	—	—	—	—	—	—	—	—	264	0.00	264	26	0.00	—	923

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	14	14
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	14	14
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	14	14

Condo/T High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	14	14
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	28	28
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.3	2.3
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.3	2.3
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4.6	4.6

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	5/21/2026	5.0	100	—
Site Preparation	Site Preparation	5/22/2026	8/14/2026	5.0	60	—
Grading	Grading	8/15/2026	3/20/2027	5.0	155	—
Building Construction	Building Construction	3/21/2027	2/27/2033	5.0	1,550	—
Paving	Paving	2/28/2033	8/1/2033	5.0	110	—
Architectural Coating	Architectural Coating	8/2/2033	1/3/2034	5.0	110	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Average	2.0	8.0	367	0.40
Demolition	Excavators	Diesel	Average	3.0	8.0	36	0.38
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.0	33	0.73

Site Preparation	Rubber Tired Dozers	Diesel	Average	3.0	8.0	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.0	8.0	84	0.37
Grading	Graders	Diesel	Average	1.00	8.0	148	0.41
Grading	Excavators	Diesel	Average	2.0	8.0	36	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.0	8.0	84	0.37
Grading	Scrapers	Diesel	Average	2.0	8.0	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.0	367	0.40
Building Construction	Forklifts	Diesel	Average	3.0	8.0	82	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.0	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.0	46	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.0	7.0	84	0.37
Paving	Pavers	Diesel	Average	2.0	8.0	81	0.42
Paving	Paving Equipment	Diesel	Average	2.0	8.0	89	0.36
Paving	Rollers	Diesel	Average	2.0	8.0	36	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.0	37	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	15	12	LDA,LDT1,LDT2
Demolition	Vendor	—	8.4	HHDT,MHDT
Demolition	Hauling	0.00	20	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	18	12	LDA,LDT1,LDT2

Site Preparation	Vendor	—	8.4	HHDT,MHDT
Site Preparation	Hauling	0.00	20	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	20	12	LDA,LDT1,LDT2
Grading	Vendor	—	8.4	HHDT,MHDT
Grading	Hauling	0.00	20	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	2,880	12	LDA,LDT1,LDT2
Building Construction	Vendor	428	8.4	HHDT,MHDT
Building Construction	Hauling	0.00	20	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15	12	LDA,LDT1,LDT2
Paving	Vendor	—	8.4	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	576	12	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.4	HHDT,MHDT
Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	7,776,000	2,592,000	0.00	0.00	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	0.00
Site Preparation	—	—	90	0.00	0.00
Grading	—	—	465	0.00	0.00
Paving	0.00	0.00	0.00	0.00	0.00

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Apartments Mid Rise	—	0%
Paving	Condo/Townhouse High Rise	—	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005
2029	0.00	204	0.03	< 0.005
2030	0.00	204	0.03	< 0.005
2031	0.00	204	0.03	< 0.005
2032	0.00	204	0.03	< 0.005
2033	0.00	204	0.03	< 0.005

2034	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	10,880	9,820	8,180	3,775,143	57,891	52,251	43,525	20,087,074
Condo/Townhouse High Rise	10,880	9,820	8,180	3,775,143	57,891	52,251	43,525	20,087,074

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Apartments Mid Rise	Wood Fireplaces	0	0
Apartments Mid Rise	Gas Fireplaces	1,020	1,020
Apartments Mid Rise	Propane Fireplaces	0	0
Apartments Mid Rise	Electric Fireplaces	0	0
Apartments Mid Rise	No Fireplaces	980	980
Apartments Mid Rise	Conventional Wood Stoves	0	0
Apartments Mid Rise	Catalytic Wood Stoves	0	0
Apartments Mid Rise	Non-Catalytic Wood Stoves	0	0
Apartments Mid Rise	Pellet Wood Stoves	0	0
Condo/Townhouse High Rise	Wood Fireplaces	0	0
Condo/Townhouse High Rise	Gas Fireplaces	1,020	1,020
Condo/Townhouse High Rise	Propane Fireplaces	0	0
Condo/Townhouse High Rise	Electric Fireplaces	0	0
Condo/Townhouse High Rise	No Fireplaces	980	980

Condo/Townhouse High Rise	Conventional Wood Stoves	0	0
Condo/Townhouse High Rise	Catalytic Wood Stoves	0	0
Condo/Townhouse High Rise	Non-Catalytic Wood Stoves	0	0
Condo/Townhouse High Rise	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

—	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	7,776,000	2,592,000	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	6,822,902	204	0.0330	0.0040	17,608,142
Condo/Townhouse High Rise	6,822,902	204	0.0330	0.0040	17,608,142

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	58,681,050	0.00

Condo/Townhouse High Rise	58,681,050	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	1,479	0.00
Condo/Townhouse High Rise	1,479	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.5	2.5	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Condo/Townhouse High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.5	2.5	10.0
Condo/Townhouse High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.9	annual days of extreme heat

Extreme Precipitation	7.5	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	4.4	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score

Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	3.1
AQ-PM	25
AQ-DPM	99
Drinking Water	15
Lead Risk Housing	59
Pesticides	9.0
Toxic Releases	45
Traffic	53

Effect Indicators	—
CleanUp Sites	74
Groundwater	71
Haz Waste Facilities/Generators	98
Impaired Water Bodies	0.00
Solid Waste	80
Sensitive Population	—
Asthma	81
Cardio-vascular	18
Low Birth Weights	84
Socioeconomic Factor Indicators	—
Education	48
Housing	67
Linguistic	82
Poverty	65
Unemployment	54

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	21.28833569
Employed	26.07468241
Median HI	16.37366868
Education	—
Bachelor's or higher	64.48094444
High school enrollment	100
Preschool enrollment	38.90671115

Transportation	—
Auto Access	0.372128834
Active commuting	99.53804697
Social	—
2-parent households	2.643397921
Voting	31.75927114
Neighborhood	—
Alcohol availability	4.516874118
Park access	38.62440652
Retail density	99.05042987
Supermarket access	94.25125112
Tree canopy	6.03105351
Housing	—
Homeownership	10.15013474
Housing habitability	0.526113178
Low-inc homeowner severe housing cost burden	32.54202489
Low-inc renter severe housing cost burden	44.3731554
Uncrowded housing	36.46862569
Health Outcomes	—
Insured adults	41.04965995
Arthritis	59.3
Asthma ER Admissions	18.9
High Blood Pressure	44.4
Cancer (excluding skin)	68.9
Asthma	37.3
Coronary Heart Disease	43.7
Chronic Obstructive Pulmonary Disease	33.2
Diagnosed Diabetes	36.9

Life Expectancy at Birth	23.5
Cognitively Disabled	4.4
Physically Disabled	1.7
Heart Attack ER Admissions	60.2
Mental Health Not Good	34.8
Chronic Kidney Disease	35.4
Obesity	39.8
Pedestrian Injuries	98.0
Physical Health Not Good	33.1
Stroke	34.3
Health Risk Behaviors	—
Binge Drinking	24.0
Current Smoker	20.2
No Leisure Time for Physical Activity	36.8
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	86.0
Elderly	54.5
English Speaking	11.2
Foreign-born	81.4
Outdoor Workers	88.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	0.2
Traffic Density	58.5
Traffic Access	87.4
Other Indices	—
Hardship	58.6

Other Decision Support	—
2016 Voting	44.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	71
Healthy Places Index Score for Project Location (b)	20
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Operations: Water and Waste Water	Outdoor water use set to zero.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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- **Geologic and Hydrogeologic Characterization, Investigation and Remediation Strategies**
- **Industrial Stormwater Compliance**
- **CEQA Review**
- **Expert Testimony**

Professional Certifications:
California Professional Geologist, P.G.
California Certified Hydrogeologist, C.Hg.

Education:
M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Experience:
30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. Spent nine years with the U.S. EPA in the Resource Conservation Recovery Act (RCRA) and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where I identified emerging threats to groundwater. While with EPA, I served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. Led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, I developed extensive client relationships and has managed complex projects that include consultations as an expert witness and a regulatory specialist, and managing projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions held include:

Government:
Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);

Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
Geologist, U.S. Forest Service (1986 – 1998).

Educational:
Geology Instructor, Golden West College, 2010 – 2104, 2017;
Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
Instructor, College of Marin, Department of Science (1990 – 1995).

Private Sector:
Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);
Executive Director, Orange Coast Watch (2001 – 2004);
Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, responsibilities have included:

- Lead analyst and testifying expert, for both plaintiffs and defendants, in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards.
- Recommending additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce exposure to hazards from toxins.
- Stormwater analysis, sampling and best management practice evaluation, for both government agencies and corporate clients, at more than 150 industrial facilities.
- Serving as expert witness for both plaintiffs and defendants in cases including contamination of groundwater, CERCLAcompliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns, for both government agencies and corporate clients.
- Lead analyst and testifying expert in the review of environmental issues in license applicationsfor large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking

water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.
- Lead author for a multi-volume remedial investigation report for an operating school in LosAngeles that met strict Sate of California regulatory requirements.
- Development of strategic approaches for cleanup of contaminated sites in consultation withclients and regulators.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities included:

- Leading efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiating a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identifying emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. Used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. Prepared geologic reports, conducted hearings, and responded to public comments from residents who were very concerned about the impact of designation.
- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Served as a hydrogeologist with the RCRA Hazardous Waste program. Duties included:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliancewith Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S.EPA legal counsel.

- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexicoand advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation- wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served as senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advising the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinkingwater supplies.
- Shaping EPA's national response to these threats by serving on workgroups and by contributingto guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improving the technical training of EPA's scientific and engineering staff.
- Earning an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Establishing national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities included:

- Mapping geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinating research with community stakeholders who were concerned with natural resource protection.
- Characterizing the geology of an aquifer that serves as the sole source of drinking water for thecity of Medford, Oregon.

As a consultant with Dames and Moore, led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large RCRA hazardous waste site in eastern Oregon.

Duties included the following:

- Supervising year-long effort for soil and groundwater sampling.
- Conducting aquifer tests.
- Investigating active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.
- Part time geology instructor at Golden West College in Huntington Beach, California from 2010 to 2014 and in 2017.

Summary of Testimony Experience Over Past Four Years

In Re New Jersey Department of Environmental Protection et al. vs. E.I. DuPont de Nemours and Company, in the United States District Court, District of New Jersey, Civil Action No. 1:19-cv-14766-RMB-JBC. Deposition in 2025. Representing Plaintiffs in matters regarding contamination of groundwater, wastewater, soil, and air with per- and poly-fluoroalkyl substances.

In Re Edmond Asher, et al., vs. RTX Corporation (f/k/a Raytheon Technologies Corporation, et al.) in the County of Huntington Superior Court, Indiana, Cause number 35D01-2006-CT-000338. Deposition in 2024. Representing Plaintiffs in matters regarding contamination of groundwater and soil vapor with trichlorethylene.

In Re Wright vs Consolidated Rail Corporation In the Circuit Court of Cook County, Illinois, Case No: 21L3966. Deposition in 2023, Representing Plaintiff in matters involving groundwater and drinking water contamination of perchloroethylene, trichlorethylene, 1,2-dichloroethane, and carbon tetrachloride.

In Re Behr Dayton Thermal Products LLC In the United States District Court for the Southern District of Ohio Western Division at Dayton, Case No: 08-cv-326. Deposition in 2022. Representing Plaintiff in matters regarding contamination of groundwater and indoor air with perchloroethylene and trichloethelene.

Orange County Water District vs. Sabic Innovative Plastics US, LLC, et al. In the Court of Appeal, Fourth District,

Division 1, California, Case No: D070553. Deposition in 2020. Representing Plaintiff in matters involving compliance with The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
Los Angeles Waterkeeper vs. AAA Plating and Inspection, Inc. In the United States District Court for the Central District of California, Case No: No. CV 18-5916 PA (GJSx). Deposition in 2019. Expert witness representing Plaintiff in matters involving contaminated stormwater runoff at an industrial facility in Compton, California.

Californians for Alternatives to Toxics vs. Schneider Dock and Intermodal Facility. In the United States District Court for the Northern District of California, Case No: 3:17-cv-05287-JST. Deposition in 2019. Expert witness representing Plaintiff in matters involving contaminated stormwater runoff at an industrial facility in Eureka, California.

Bells et al. vs. The 3M Company et al. In the United States District Court for the District of Colorado, Case No: 1:16-CV-02531-RBJ. Deposition in 2018. Expert witness representing Plaintiff on matters regarding the general hydrogeological conditions present in an area impacted by per- and poly-fluoroalkyl substances.

Ungar vs. Foundation for Affordable Housing. In the Superior Court, State of California, Los Angeles County, Case No. BC628890 Deposition in 2017. Expert witness representing defendant on matters involving alleged drinking water contamination.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S.EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making andPublic Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins atschools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBEReleases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells.

Presentation to the Ground Water and Environmental Law Conference, National GroundwaterAssociation.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Waterin Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Waterin the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to atribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to ameeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking WaterSupplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant.Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting ofthe National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to ameeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to AddressImpacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater(and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA andState Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublishedreport.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground StorageTanks.

Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal WatercraftUsage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George WrightSociety Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval AirStation, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui,October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Airand Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Basesin California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:
Selected as subject matter expert for the California Professional Geologist licensing examinations,2009-2011.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld, P.E., Spaeth, K.R., McCarthy, S.J. *et al.* Camp Lejeune Marine Cancer Risk Assessment for Exposure to Contaminated Drinking Water From 1955 to 1987. *Water Air Soil Pollut* **235**, 124 (2024). https://doi.org/10.1007/s11270-023-06863-y.

Rosenfeld P.E., Spaeth K.R., Remy L.L., Byers V., Muerth S.A., Hallman R,C., Summers-Evans J., Barker S. (2023) Perfluoroalkyl substances exposure in firefighters: Sources and implications, *Environmental Research*, Volume 220, https://doi.org/10.1016/j.envres.2022.115164.

Rosenfeld P.E. and Spaeth K.R., (2023) Authors' Response to Letter to the Editor from Bullock and Ramacciotti, *Water Air Soil Pollution* Volume 234, https://doi.org/10.1007/s11270-023-06165-3

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.,** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Cheremisinoff, N.P., **Rosenfeld, P.E.** Davletshin, A.R. (2008). ***Responsible Care***. Gulf Publishing. Texas.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy of Odour Wheels for Odours of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme for The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated with Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affects on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook for Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation on St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Master's thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelor's Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted at University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus on Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model for PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium on Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium on Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting for Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington.

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation with High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation with High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. The course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate the effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate the effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate the effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the District Court of Harris County Texas
Mt Davis Interest, Inc v Sesco Cement Corp
Cause No 2023-26512
Trial 6-6-2-25

In the United States Southern District of New York
Gallo vs Avon Products Inc., et al
Civil Action No.: 1:23-cv-2023
Deposition 4-24-2025

In Vanderburgh Superior Court 5, County of Vanderburgh, Indiana
Markello v CSX
Civil Action No 82D05-2011-CT-004962
Deposition 3-26-25

Iin the Circuit Court of Cook County Illinois
Jarosiewicz v Northeast Regional Railroad
Case No 2023 L 002290
Deposition 2-27-25

In the District Court 191st Judicial District Dallas County
Acklin v Poly America International
Cause No DC-22-08610
Deposition 1-8-2025

United States District Court, Norther District of California
Asustin Vs Monsanto
Case No 2:23-cv-272
Deposition 12-20-25

In Jefferson Circuit Court Division One, Louisville, Kentucky
Stafford vs, CSX
Case No. 18-CI-001790

Deposition: 8-27-24

In the Twenty-Second Judicial Circuit of St. Louis. State of Missouri
Patricia Godfrey vs, Amtrak
Case No. 2122-CC-00525
Deposition: 7-17-24

In the Circuit Court of Jefferson County Alabama
Linda Early Vs. CSX
Case number CV-2021-00241
Deposition 6-24-24

In the Court of Common Please Lucas County, Ohio
Brenda Conkright vs. CSX
Case No. G-4801-CI-0202102664-000
Deposition: 6-4-24

In the Commonwealth of Kentucky, Greenup Circuit Court
Patsy Sue Napier vs. CSX
Case No. 19-CI-0012
Deposition: 5-8-2-24

In United States District Court of Hawaii
Patrick Feindt, Jr. et al. vs. The United States of America
Case No. 1:22-cv-LEK-KJM
Trial 3-29-24 and 4-5-24

In the District Court of Hood County State of Texas
Artie Gray vs. Exxon Mobil
Case No. C-2018047
Rosenfeld Deposition:4-22-2024

In the Elkhart Superior Court State of Indiana
Estate of Clark Stacy vs. Penn Central Corporation
Cause No 2D01-2001-CT-00007
Rosenfeld Deposition 1-25-2024 and 3-7-2024

In the Circuit Court of Trempealeau County, State of Wisconsin
Michael J. Sylla et al. vs. High-Crush Whitehall LLC
Case No. 2019-CV-63, 2019-CV-64, 2019-CV-65, 2019-CV-66
Rosenfeld Deposition: 3-5-2024

In the Circuit Court of Trempealeau County, State of Wisconsin
Leland Drangstveit vs. High-Crush Blair LLC
Case No. 19-CV-66
Rosenfeld Deposition 3-5-2024

In the Circuit Court of Jefferson County Alabama
Donald Lee Ashworth vs. CSX Transportation Inc.
Case No CV-2021-901261
Rosenfeld Deposition 1-23-2024

In the United States District Court for the Eastern District of Wisconsin
Gary L Siepe vs. Soo Line Railroad
Case No. 2:21-cv-00919
Rosenfeld Deposition 1-19-2024

In the United States District Court for the Western District of Louisiana
Ricky Bush v. Clean Harbors Colfax LLC
Case No. 1:22-cv-02026-DDD-JPM
Rosenfeld Deposition 12-18-2023 and 1-15-2024

In United States District Court of Hawaii
Patrick Feindt, Jr. et al. vs. The United States of America
Case No. 1:22-cv-LEK-KJM
Rosenfeld Deposition 11-29-2023

In the Circuit Court for the Twentieth Judicial Circuit St. Clair County, Illinois
Timothy Gray vs. Rural King et al.
Case No 2022-LA-355
Rosenfeld Deposition 9-26-2023

In United States District Court Eastern District of Wisconsin
Gary L. Siepe vs. Soo Line Railroad Company
Case No. 2:21-cv-00919
Rosenfeld Deposition 9-15-2023

In the Circuit Court of Cook County Illinois
Donald Fox vs. BNSF
Case No. 2021 L12
Rosenfeld Deposition 9-12-2023

In the Court of Common Please Cuyahoga County, Ohio
Thomas Schleich vs. Penn Central Corporation
Lead Case No. CV-20-939184
Rosenfeld Deposition 8-27-2023

In the Circuit Court of Jackson County Missouri at Kansas City
Timothy Dalsing vs. BNSF
Case No. No. 2216-cv06539
Rosenfeld Deposition 7-28-2023

In the United States District Court for the Southern District of Texas Houston Division
International Terminals Company LLC Deer Park Fire Litigation
Lead Case No. 4:19-cv-01460
Rosenfeld Deposition 7-25-2023

In the Circuit Court of Livingston County Missouri
Shirley Ralls vs. Canadian Pacific Railway and Soo Lind Railroad
Case No. 28LV-CV0020
Rosenfeld Daubert Hearing 7-18-2023 Trial Testimony 7-19-2023

In the Circuit Court of Cook County Illinois
Brenda Wright vs. Penn Central and Conrail
Case No. No. 2032L003966
Rosenfeld Deposition 6-13-2023

In the Circuit Court Common Please Philadelphia of Jefferson County Alabama
Frank Belle vs. Birmingham Southern Railroad Company et al.
Case No. 01-cv-2021-900901.00
Rosenfeld Deposition 4-6-2023

In the Circuit Court of Jefferson County Alabama
Linda De Gregorio vs. Penn Central
Case No. 002278
Rosenfeld Deposition 3-27-20203

In the United States District Court Eastern District of New York
Rosalie Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-16-2023

In the Superior Court of Washington, Spokane County
Judy Cundy vs. BNSF
Case No. 21-2-03718-32
Rosenfeld Deposition 3-9-2023

In The Court of Common Pleas of Philadelphia County, PA Civil Trial Division
Feaster v Conrail
Case No. 001075
Rosenfeld Deposition 2-1-2023

In United States District Court for the Central District of Illinois
Sherman vs. BNSF
Case No. 3:17-cv-01192
Rosenfeld Deposition 1-18-2023

In United States District Court District of Colorado
Gonzales vs. BNSF
Case No. 1:21-cv-01690
Rosenfeld Deposition 1-17-2023

In United States District Court District of Colorado
Abeyta vs. BNSF
Case No. 1:21-cv-01689-KMT
Rosenfeld Deposition 1-3-2023

In United States District Court For The Easter District of Louisiana
Nathaniel Smith vs. Illinois Central Railroad
Case No. 2:21-cv-01235
Rosenfeld Deposition 11-30-2022

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division

Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022, Trial 1-10-2023

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation

Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al. vs Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois

Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants

Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintifs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. vs. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.

Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, vs. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the County of Kern, Unlimited Jurisdiction
Rose Propagation Services vs. Heppe Enterprises
Case No. S-1500-CV-278190, LHB
Rosenfeld Deposition: May 2014

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

In the Court of Galveston County, Texas 56th Judicial District
MDL Litigation Regarding Texas City Refinery Ultracracker Emission Event Litigation
Cause No. 10-UC-0001
Rosenfeld Deposition: March 2013
Rosenfeld Trial: September 2013

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the United States District court of Southern District of California
United States of America, Plaintiff vs. 2,560 Acres of Land, more or less, located in Imperial County, State of California; and Donald L. Crawford, et. al.
Civil No. 3:11-cv-02258-IEG-RBB
Rosenfeld Deposition: December 2012, January 2013

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.

From:	Bullock, John (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	BOS-Operations; Carroll, John (BOS); BOS Legislation, (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS)
Subject:	6 Letters Regarding File Nos. 250700, 250701, 250966, and 251072
Date:	Monday, December 1, 2025 12:18:52 PM
Attachments:	6 Letters Regarding Family Zoning Plan.pdf

Hello,

Please see attached 6 letters regarding File Nos.:

250700: Zoning Map - Family Zoning Plan
250701: Planning, Business and Tax Regulations Codes - Family Zoning Plan
250966: General Plan Amendments - Family Zoning Plan
251072: Planning, Business and Tax Regulations Codes - Family Zoning Plan

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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From:	D M LaPointe
To:	Carroll, John (BOS); Melgar, Myrna (BOS); Mandelman, Rafael (BOS)
Cc:	Lurie, Daniel (MYR); Wtpcc Delegates; Wtpcc Officers; MelgarStaff (BOS); Board of Supervisors (BOS)
Subject:	Submission of WTPCC Letter to the Land Use & Transportation Committee
Date:	Monday, December 1, 2025 11:20:45 AM
Attachments:	WTPCC-LU-upzoning - 12-1-25.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair and Clerk,

Please find attached the West of Twin Peaks Central Council's letter regarding the Family Zoning Plan for consideration by the Land Use & Transportation Committee. We respectfully request that this letter be entered into the official record for the upcoming hearing.

Thank you for your attention.

--
Denise M. LaPointe
President
WTPCC

West of Twin Peaks Central Council

A Resource for Neighborhood Organizations West of Twin Peaks in San Francisco since 1936

PO Box 27112
San Francisco, CA 94127

http://www.westoftwinpeaks.org/

December 1, 2025

Chair and Members of the Land Use & Transportation Committee:

On behalf of the West of Twin Peaks Central Council and the thousands of homeowners and families we represent, we register our firm and unequivocal opposition to the Family Zoning Plan unless it is substantially amended.

We believe in housing. We believe in growth. And we have proved it - approving and welcoming thousands of new homes at Stonestown, Parkmerced, Balboa Reservoir, and throughout our corridors. Our neighborhoods have done our part and remain ready to do more.

But this proposal is not real planning. It is paper compliance masquerading as progress, shifting the costs and destabilizing impacts onto the very neighborhoods that have kept San Francisco livable, stable, and resilient.

The City's own financial analysis makes one fact unavoidable: only mid-rise redevelopment pencils out. That means this plan incentivizes the demolition of existing homes - not on transit corridors already upzoned by SB 79, but deep inside long-standing, middle-class neighborhoods. SB 79 is already the law. Local zoning will be overridden in 2032. The City should be defending its residents - homeowners and long-term residents alike - not eliminating their remaining protections through density decontrol.

Density decontrol must be removed. Without that amendment, the plan reads as a teardown blueprint, not a family housing strategy.

A central flaw in the proposal is the assumption that so-called "well-resourced neighborhoods" should absorb the city's unmet housing goals, even though these areas do not have the infrastructure capacity to support significant added density. This approach contradicts the City's own service and transit data. Effective equity planning pairs new housing with targeted investment in under-served communities - expanding transit, upgrading utilities, and improving public services where it will meaningfully reduce disparities. Concentrating demolition incentives in stable neighborhoods while leaving actual inequities unaddressed is not sound planning and does not advance the City's stated equity goals.

WTPCC therefore urges the Committee to adopt these essential changes:

Eliminate density decontrol.
It is unnecessary, inequitable, and guaranteed to trigger speculative demolition pressure.

Protect small businesses and merchant corridors.
West Portal, Taraval, and Lakeside cannot absorb displacement without losing the local merchants who define them.

Restore design review, public notice, and protection of historic resources.
Residents - especially longtime homeowners - have the right to transparency. Eliminating due process is unjustifiable.

Guarantee strong protections for existing homeowners and long-term residents.
Middle-class families, whether they rent or own, are the backbone of San Francisco and deserve respect, stability, and a meaningful voice.

At the same time, WTPCC and its members are committed partners in real solutions -and we are sounding this alarm now because the unintended consequences of this plan will be profound and irreversible if the City does not course-correct. We stand ready to help the City unlock and incentivize the more than 70,000 approved units already in the pipeline - homes that can be delivered now, without destabilizing established neighborhoods or erasing neighborhood identity.

Our stable, historic, family-oriented neighborhoods are not obstacles - they are the civic bedrock and democratic center of gravity of this city, composed of taxpayers who keep San Francisco running. To ignore this constituency and insist that one community upend its way of life to cover for years of government failure is not equity - it is a fundamental injustice. No credible planning effort punishes families and homeowners for problems created by City Hall.

If the City is serious about housing, it will focus on the 70,000 units already approved - not dismantle the neighborhoods that sustain the city.

Amend this plan. Protect homeowners and tenants, small business and historic resources. And prove that San Francisco can grow without sacrificing the very neighborhoods that make it worth fighting for.

Sincerely,

Denise LaPointe
President | WTPCC

Cc: Mayor Daniel Lurie
Supervisor Rafael Mandelman, President, Board of Supervisors and Members
WTPCC Delegates

From:	James Lloyd
To:	Chen, Lisa (CPC); Board of Supervisors (BOS); Board of Supervisors (BOS); BOS-Supervisors; ChanStaff (BOS); ChenStaff; DorseyStaff (BOS); Fielder, Jackie (BOS); MahmoodStaff; MandelmanStaff (BOS); MelgarStaff (BOS); SauterStaff; SherrillStaff; Walton, Shamann (BOS)
Cc:	Carroll, John (BOS); Dennis Phillips, Sarah (CPC); Cityattorney
Subject:	public comment re Family Zoning plan for today"s Land Use Committee meeting
Date:	Monday, December 1, 2025 9:16:51 AM
Attachments:	CFH v BH - 2023-12-21 - Judgment.pdf San Francisco - Family Zoning Plan - BoS Land Use Committee 2025.12.01.pdf ucb-examining-local-law-policy-planning-practice-on-development-in-sf-using-cales.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear San Francisco Board of Supervisors,

The California Housing Defense Fund and Californians for Homeownership submit the attached public comment (and referenced attachments) for today's Land Use Committee meeting regarding the Family Zoning Plan, agendized as items 2 through 9.

Sincerely,

James M. Lloyd
Director of Planning and Investigations
California Housing Defense Fund
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FILED
Superior Court of California
County of Los Angeles
12/21/2023
David W. Slayton, Executive Officer / Clerk of Court
By: M. Mort Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CALIFORNIANS FOR HOMEOWNERSHIP, INC., a California nonprofit public benefit corporation,

Petitioner,

v.

CITY OF BEVERLY HILLS,

Respondent.

Case No. 23STCP00143

[~~PROPOSED~~] JUDGMENT

Assigned for all purposes to:
Hon. Curtis A. Kin (Dept. 82)

On September 12, 2023, the Court held a hearing on Petitioner's Verified First Amended Petition for Writ of Mandate. After considering the parties' papers and oral argument, the Court issued the decision attached hereto as Exhibit A.

NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

1. Judgment is entered in favor of Petitioner on the Verified First Amended Petition for Writ of Mandate.

2. A writ of mandate shall issue pursuant to Code of Civil Procedure section 1085 and Government Code section 65754 (a) requiring Respondent to bring the housing element of its general plan into substantial compliance with state law within 120 days of the date of this judgment, (b) requiring Respondent to bring its zoning ordinance into consistency with the housing element of its general plan within 120 days of the amendment required by (a), and (c) requiring Respondent to

file a return to the writ within 250 days of the date of this judgment.

3. Pursuant to subdivision (a)(1) of Government Code section 65755, the Court hereby suspends the authority of Respondent to issue building permits pursuant to Division 13 (commencing with section 17910) of the Health and Safety Code, and all other related permits, except for permits that create new residential bedrooms or units, and except for permits subject to subdivision (b) of Government Code section 65755, until the City has substantially complied with the requirements of Article 5 of Chapter 3 of Division 1 of Title 7 of the Government Code (commencing with Government Code Section 65300).

4. The Court hereby declares that Respondent City of Beverly Hills has not adopted a substantially compliant general plan housing element

5. Petitioner is entitled to recover its reasonable and legally-authorized costs pursuant to a memorandum of costs to be subsequently filed with the Court.

Dated: 12/21/2023

Curtis A. Kin/Judge

Hon. Curtis A. Kin
Judge of the Superior Court

Respectfully submitted this 27th day of October, 2023
CALIFORNIANS FOR HOMEOWNERSHIP, INC.

Matthew P. Gelfand

Attorneys for Petitioner CALIFORNIANS FOR HOMEOWNERSHIP, INC.

EXHIBIT A

FILED
Superior Court of California
County of Los Angeles
SEP 12 2023
David W. Slayton, Executive Officer/Clerk of Court
By: M. Mort, Deputy

Superior Court of California
County of Los Angeles

CALIFORNIANS FOR HOMEOWNERSHIP, INC., Petitioner, vs. CITY OF BEVERLY HILLS, Respondent.	Case No. 23STCP00143 **RULING ON VERIFIED FIRST AMENDED PETITION FOR WRIT OF MANDATE** Dept. 82 (Hon. Curtis A. Kin)

Petitioner Californians for Homeownership, Inc. petitions for a writ of mandate directing respondent City of Beverly Hills to adopt a revised housing element pursuant to Government Code § 65754.

I. Factual Background

The State of California requires each city to have a "comprehensive, long-term general plan for the physical development" of the city. (Gov. Code § 65300.)[1] Each general plan must have a housing element. (§ 65302(c).) The housing element consists of 'standards and plans for housing sites in the municipality that 'shall endeavor to make adequate provision for the housing needs of all economic segments of the community.' [Citations.]" (*California Building Industry Assn. v. City of San Jose* (2015) 61 Cal.4th 435, 444; *see also* § 65580 [legislative findings concerning housing element law].)

"A municipality must review its housing element for the appropriateness of its housing goals, objectives, and policies and must revise the housing element in accordance with a statutory schedule." (*Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193, 222, citing § 65588(a), (b).) "The interval between the due dates for

[1] All statutory references are to the Government Code, unless otherwise specified.

the revised housing element is referred to as a planning period or cycle, which usually is eight years." (*Martinez,* 90 Cal.App.5th at 222, citing § 65588(e)(3), (f)(1).)

"A revised housing element's assessment of needs must quantify the locality's existing and projected housing needs for all income levels, which includes the locality's proportionate share of regional housing needs for each income level." (*Martinez,* 90 Cal.App.5th at 223, citing § 65583(a)(1).) "The projected regional housing needs for a planning period are determined by the HCD [Department of Housing and Community Development] in consultation with regional 'councils of government.'" (*Martinez,* 90 Cal.App.5th at 223, citing §§ 65584(a) & (b), 65584.01, 65588(e)(3).) "Based on the HCD's regional housing needs determination, each regional council of governments adopts a 'final regional housing need plan that allocates a share of the regional housing need' among the cities and counties within its region." (*Martinez,* 90 Cal.App.5th at 223, citing § 65584(b).)

For the 2021-2029 planning period, the City Council of respondent City of Beverly Hills ("City") adopted a housing element on October 12, 2021 and submitted it for review to HCD. (JR 776.) On January 14, 2022, HCD determined that the housing element did not fully comply with the housing element law and provided necessary revisions. (JR 1309-16.)

On September 28, 2022, the City submitted a revised housing element to HCD. (JR 776.) On November 28, 2022, HCD determined that the revised housing element did not fully comply with the housing element law and provided necessary revisions. (JR 1318-24.)

On February 21, 2023, after having revised the September 2022 housing element, the City adopted the revision. (JR 5.) On February 21, 2023, petitioner Californians for Homeownership, Inc., who monitors local compliance with the housing element law, sent a letter to the City asserting that the revised housing element was inadequate for reasons identified by HCD and petitioner. (JR 1584-85.) On May 12, 2023, HCD determined that the housing element does not substantially comply with housing element law. (RJN Ex. B.)

II. Procedural History

On January 18, 2023, petitioner filed a verified petition for writ of mandate. On May 24, 2023, pursuant to stipulation, petitioner filed a verified first amended petitioner for writ of mandate.

On June 22, 2023, during the trial setting conference, the Court set the hearing on the instant petition for September 12, 2023.

On July 14, 2023, petitioner filed an opening brief. On August 15, 2023, respondent filed an opposition. On August 31, 2023, petitioner filed a reply.

III. Request for Judicial Notice

Petitioner's requests for judicial notice are ruled on as follows:

- Exhibit A (September 15, 2017 Assembly Floor Analysis of AB 1397 (2017-2018 Session)) – GRANTED (Evid. Code § 452(c); *Wood v. Kaiser Foundation Hospitals* (2023) 88 Cal.App.5th 742, 751, fn. 4)

- Exhibit B (May 12, 2023 Letter from HCD to City) – GRANTED (Evid. Code § 452(c))

- Exhibit C (Staff Report for June 22, 2023 Meeting of Beverly Hills Planning Commission) – DENIED

- Exhibit D (Minutes of June 22, 2023 Meeting of Beverly Hills Planning Commission) – DENIED

- Exhibit E (Resolution No. 1907 of Beverly Hills Planning Commission) – DENIED

- Exhibit F (2022 Form 10-K for Creative Media & Community Trust Corporation (Excerpts)) – DENIED

- Exhibit G (June 10, 2020 Memorandum of the California Department of Housing and Community Development, Entitled "Housing Element Site Inventory Guidebook") – GRANTED (Evid. Code § 452(c))

- Exhibit H (City of Gardena's 2021-2029 Housing Element, Table C-1) – GRANTED (Evid. Code § 452(c))

With respect to denying the request for judicial notice of Exhibits C, D, E, and F, the Court notes these exhibits are extra-record evidence petitioner presents to demonstrate that certain sites listed in the sites inventory of the housing element are improperly included. For the reason stated in section V.C below, this is improper. The exhibits are accordingly irrelevant. (*Mangini v. R.J. Reynolds Tobacco Co.* (1994) 7 Cal.4th 1057, 1063 ["Although a court may judicially notice a variety of matters (Evid. Code, § 450 *et seq.*), only relevant material may be noticed"].)

IV. Standard of Review

CCP § 1085(a) provides: "A writ of mandate may be issued by any court to any inferior tribunal, corporation, board, or person, to compel the performance of an act which the law specially enjoins, as a duty resulting from an office, trust, or station, or to compel the admission of a party to the use and enjoyment of a right or office to

which the party is entitled, and from which the party is unlawfully precluded by that inferior tribunal, corporation, board, or person."

"Any action brought by any interested party to review the conformity with the provisions of this article of any housing element or portion thereof or revision thereto shall be brought pursuant to Section 1085 of the Code of Civil Procedure; the court's review of compliance with the provisions of this article shall extend to whether the housing element or portion thereof or revision thereto substantially complies with the requirements of this article." (§ 65587(b); *see also* § 65751.) Substantial compliance means "actual compliance in respect to the substance essential to every reasonable objective of the statute, as distinguished from mere technical imperfections of form." (*Martinez,* 90 Cal.App.5th at 237, internal citations omitted.)

"[A] city's adoption of a housing element is a legislative enactment, something which is generally entitled to some deference." (*Fonseca v. City of Gilroy* (2007) 148 Cal.App.4th 1174, 1191.) "If the municipality has substantially complied with statutory requirements, we will not interfere with its legislative action, unless that action was arbitrary, capricious, or entirely lacking in evidentiary support." (*Ibid.*) The challenging party has the burden to demonstrate that the housing element is inadequate. (*Ibid.*)

V. Analysis

A. This Dispute is Not Moot

As a preliminary matter, respondent asserts that the City anticipates adopting a revised housing element in November of this year to address concerns about the current housing element. (Wiener Decl. ¶ 2.) However, there is no guarantee that a revision will be completed by November or that the City will adopt a revision at that time, or at any time thereafter. The Court can only rule based on the current housing element. The instant petition is entitled to preference. (§ 65752.) Further, if the Court were to enter judgment in favor of petitioner, the housing element law provides deadlines for the City to address the deficiencies in the housing element and to submit the revision to HCD. (§ 65754(a).) If respondent were to appeal, the appeal would be given preference also. (§ 65752.) Accordingly, there is no reason to delay ruling on the merits of the operative first amended petition.

B. Whether Sites Inventory Meets Statutory Requirements

1. Realistic Development Capacity

The inventory in a housing element must "specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing." (§ 65583.2(c).) For a city that does not require a

minimum residential density,[2] the city "shall demonstrate how the number of units determined for [each] site...will be accommodated." (§ 65583.2(c)(1).) As part of the calculation, " [t]he number of units calculated...shall be adjusted as necessary, based on the land use controls and site improvements requirement identified in paragraph (5) of subdivision (a) of Section 65583, the realistic development capacity for the site, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities." (§ 65583.2(c)(2).)

An "assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs" shall include an "analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels...including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development." (§ 65583(a)(5).)

To demonstrate that its inventory is adequate, respondent relies on a Mixed Use Overlay Zone ("Overlay Zone") adopted by ordinance on November 17, 2020, where the maximum residential density within the zone was increased from 0 in commercial areas to 79.2 units/acre. (JR 200, 209.) The Overlay Zone spans the length of the City from east to west and partially north to south, along its largest commercial corridors, including Wilshire Boulevard, Robertson Boulevard, Olympic Boulevard, South Doheny Drive, and South Beverly Drive. (JR 125; *see also* JR 213 [map of Overlay Zone].) In the housing element, the City describes the purported benefits of the Overlay Zone: "This wide-scale rezoning allows for the creation or conversion of non-residential space into residential units, and therefore will create all net new housing, since it does not involve the displacement of any existing occupied housing/residents." (JR 125.)

Respondent argues that the maximum residential density exceeds the minimum 30 units per acre that is statutorily deemed appropriate to accommodate housing for lower income individuals. (§ 65583.2(c)(3)(B)(iv).) Respondent also argues that existing commercial buildings in the Overlay Zone may obtain a permit to convert to a mixed-use building and obtain relief from having to comply with standards concerning parking requirements, loading facilities, outdoor living space, commercial-residential transitional setbacks, or height limits if compliance is physically infeasible. (JR 1636; *see also* Chen Decl. Ex. G [Beverly Hills Municipal Code ("BMMC") § 10-3-1888].) The vacancy rates for commercial buildings also purportedly create an incentive for commercial building owners to convert their buildings to mixed-use projects. (JR 201.)

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[2] It is undisputed Beverly Hills does not mandate a minimum residential density.

For commercial properties listed in the sites inventory of the housing element that were designated for conversion or indicated as having conversion potential (JR 229-34), to calculate the total number of units on the site, the City multiplied the total parcel size by the maximum allowable residential density.[3] However, the total parcel size listed in the sites inventory refers to land area, not the square footage of the existing building that can accommodate residential units. Contrary to respondent's contention, the sites inventory does not account for floor area capacity; the sites inventory lists the height limit of the building, not the number of stories to be converted to residential use. (*See, e.g.*, JR 229 [column name is "Height Limit (stories)," 233 [8500 Wilshire Blvd. described as "8 story building – conversion," but height limit is 3 stories].) As a result, for buildings to be converted to mixed use, the housing element does not demonstrate how the number of units indicated in the sites inventory will be accommodated, as required by section 65583.2(c)(1).

Moreover, as petitioner points out in the reply, most of the sites in the City's sites inventory are not designated as conversions or potential conversions. (JR 229-34.) For sites not indicated as conversions, any construction of residential units is subject to land use and building controls. For example, multi-family developments are subject to height limits from three to five stories. (JR 153-54.) Any building in the Overlay Zone must include commercial uses on the ground floor, and residential uses on the first floor within the first 40 feet from the street are prohibited. (BMMC §§ 10-3-1877(C), 10-3-1879.) Moreover, each multi-family development must have at least 200 square feet for each dwelling unit, excluding front yards, balconies, and pedestrian accessways. (BHMC §§ 10-3-1886, 10-3-2803.)

The sites inventory contains no adjustment based on land use controls for new construction, as required by section 65583.2(c)(2). Rather, like the sites designated as conversions, the number of units for each site is calculated based on the land area multiplied by the maximum residential density. Moreover, the housing element contains no meaningful consideration and analysis of the governmental constraints on the development of housing, as required by § 65583(a)(5). Rather, the City relies on prior approved and proposed developments in arguing in conclusory fashion that "the current standards are not inhibiting development of housing." (JR 158-159, 203-04.) Accordingly, the housing element, including the sites inventory, fails to account for the realistic development capacity for the sites listed in the inventory.

With respect to respondent's contention that the maximum residential density exceeds the density set forth in section 65583.2(c)(3)(B)(iv), this only means that the

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[3] For example, for 8730 Wilshire Blvd., the parcel size is 11,863 square feet. (JR 233.) There are 1/43,560 acres in one square foot. (*See* https://www.britannica.com/science/acre-unit-of-measurement [43,560 square feet in 1 acre].) 11,863 square feet multiplied by 1/43,560 acre per square foot is 0.27 acres. 0.27 acres multiplied by 79.2 units per acre is approximately 21 units.

City does not have to provide an analysis demonstrating how its adopted density accommodates its share of the regional housing need for lower income households. (§ 65583.2(c)(3)(A-B).) However, the City still must adjust the number of units for each site based on the realistic development capacity of the site under section 65583.2(c)(1) and (c)(2) and provide an "analysis of potential and actual governmental constraints upon the...development of housing for all income levels" under section 65583(a)(5).

Petitioner also argues that the City designated the majority of the sites on the sites inventory as 100% low-income or 100% moderate-income housing without explaining the basis for such designation. (OB at 10:6-7.) Petitioner further argues that the City did not adjust the unit counts based on "typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction," as required by section 65583.2(c)(2). (OB 10:7-8.)

Petitioner, however, does not reference any statute that requires an explanation for the basis for the low-income or moderate-income housing designation. The housing element law only requires that the City specify "the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing" and demonstrate "how the number of units determined for that site...will be accommodated." (§ 65583.2(c), (c)(1).) The sites inventory indicates the total number of units for each site. (JR 229 ["Total Units" column].) By indicating the number of units that are designated as low-income or moderate-income housing, the City also indicates "whether the site is adequate to accommodate lower income housing [or] moderate-income housing." (JR 229 ["Lower" and "Mod" columns].) While the City did not explain how the total number of units will be accommodated for the reasons stated above, the designation of housing as low-income or moderate-income is not deficient.

Nevertheless, it is not apparent from the sites inventory whether the City adjusted the numbers for low-income and moderate-income housing based on "typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction." (§ 65583.2(c)(2).) By multiplying the land area by the maximum residential density of 79.2 units per acre and designating all housing as low- or moderate-income housing, the City assumes that all units built on the site will be low-income or moderate-income housing. The City does not account for the possibility that only a certain percentage of the housing on the site will be designated for residents with low- or moderate-income. A revised housing element would need to contain an adjustment based on typical densities at similar affordability levels.

In sum, with respect to realistic development capacity, the housing element is deficient for the following reasons: (1) for conversions, the sites inventory calculates the total number of units based on a product of land area and the maximum residential density without accounting for the floor area of the building; (2) the sites

inventory does not contain any adjustments based on land use controls for new construction; (3) the housing element contains no analysis of the governmental constraints on the development of housing; and (4) the sites inventory does not contain any adjustments based on typical densities of existing or approved residential developments at similar affordability levels in the City.

2. Nonvacant Sites

For nonvacant sites, the housing element law imposes the following additional requirement:

> [T]he city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

(§ 65583.2(g)(1).)

Petitioner argues that the City does not explain how its methodology relates to the sites it has included or excluded in the sites inventory. For underutilized nonvacant sites, respondent explains that it selected sites that were more likely to be redeveloped or converted based on evidence of a lack of investment in the property, such as a lack of maintenance or lack of recent upgrades and improvements; parcels with underutilized improvements; and parcels with existing commercial buildings that are higher than 3 stories but whose floor plan is conducive to residential conversion. (JR 202-03, 210-11.) Respondent also explains that existing uses do not constitute an impediment to additional residential development because the creation of the Overlay Zone creates opportunities for residential development; conversion from non-residential to residential use costs less than new construction; and high residential property values in the City create financial incentives for residential development. (JR 209-10.) However, respondent discusses its methodology for determining development potential generally, without engaging in any site-specific analysis.

Respondent contends that it need not engage in an analysis of the methodology of the development potential for each site. The Court disagrees. Section

65583.2(g)(1) states that, for nonvacant sites, "the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential." Reading the subdivision as a whole, the City is required to provide an explanation of the methodology for each site in the sites inventory. Among the factors that the methodology must consider are "the current market demand for the existing use" and "an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development." (§ 65583.2(g)(1).) These factors necessarily relate to specific sites and cannot be discussed generally. Because the Legislature included these factors, the Legislature surely intended that the City provide "an explanation of the methodology used to determine the development potential" for each site.

Without a site-specific analysis, it is unclear how the methodology was applied. For example, as petitioner points out in the opening brief, the City purports to have excluded commercial buildings that contained medical uses and car dealerships from the sites inventory. (JR 210.) However, the sites inventory includes medical buildings and car dealerships. (*See, e.g.*, JR 229-30 [153 S. Doheny Dr., 239 S. La Cienega Blvd., 8833 W. Olympic Blvd., 8845 W. Olympic Blvd., 9134 W. Olympic Blvd.].) The City does not explain how the existing use does not serve as an impediment to residential development.

For the foregoing reasons, with respect to section 65583.2(g)(1), the housing element is deficient because the City did not provide an explanation of the methodology used to determine the development potential for each site, including a discussion of the factors probative of likelihood of redevelopment set forth in section 65583.2(g)(1).

Further, the sites inventory shows that the City is meeting all of its share of the need for lower-income housing through nonvacant sites. Accordingly, section 65583.2(g)(2), quoted below, is implicated:

> In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.

(§ 65583.2(g)(2).)

For nonvacant sites, the "Field Notes/Existing Conditions & Analysis for Keeping/Removing" column in the sites inventory only indicates the existing use of the site and whether the site is designated for conversion or has conversion potential. (JR 229-34.) The City does not engage in any discussion of occupancy rates, lease terms, viability of the business operating at the sites. Nor does the City present any other discussion demonstrating that the existing use for each site "does not constitute an impediment to additional residential development during the period covered by the housing element." (§ 65583.2(g)(2).) Without any evidence concerning the existing use of each site, the existing use is presumed to impede additional residential development. (*Ibid.*)

Respondent maintains that Culver City and Gardena obtained HCD approval based on a chart similar to its sites inventory. However, unlike Beverly Hills, Gardena's sites inventory sets forth the existing use of each site and why the existing use is likely to be discontinued during the planning period. (Reply RJN Ex. B; cf. Chen Decl. Ex. B at 71 [listing criteria used in selection of sites].) With respect to Culver City, the sites inventory does not set forth the reason why the existing use is likely to be discontinued. (Chen Decl. Ex. A at Appendix B.) However, elsewhere in the housing element, Culver City discusses sites that present opportunities for development based on positive responses from property owners and developers. (Chen Decl. Ex. A at B-9 to B-10.) Unlike Beverly Hills, Culver City discussed how the existing use at certain sites would not impede residential development. Beverly Hills did not engage in any site-specific analysis concerning how the existing use would not impede additional residential development.

Respondent contends that the Court of Appeal in *Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193 determined that no site-specific analysis concerning the methodology used to determine development potential and additional development factors is required. This is not quite accurate. In *Martinez*, the Court of Appeal found that section 65583.2(g)(1) "does not mandate the City 'specify the additional development potential for each [nonvacant] site within the planning period and ... provide an explanation of the methodology used to determine the development potential' *in the housing element itself.*" (*Martinez*, 90 Cal.App.5th at 248-49, emphasis added.) While specification of the additional development potential for each site does not have to be part of the housing element, the City still must demonstrate the additional development potential for each site. In *Martinez*, for example, the City of Clovis provided evidence outside of the housing element to demonstrate the development potential of a nonvacant site. (*Id.* at 249-51.)

Here, there is no analysis of the additional development potential for each site listed in the sites inventory in the housing element or elsewhere. Further, the housing element does not contain findings based on substantial evidence that the existing uses of nonvacant sites are likely to be discontinued, as required by section 65583.2(g)(2).

In sum, with respect to nonvacant sites, the housing element is deficient for the following reasons: (1) the City did not provide an explanation of the methodology used to determine the development potential for each site in the sites inventory, including a discussion of the factors probative of likelihood of redevelopment set forth in section 65583.2(g)(1); and (2) the City fails to demonstrate with substantial evidence that the existing use for each site in the sites inventory does not constitute an impediment to additional residential development during the period covered by the housing element.

C. Specific Sites

Petitioner also contends that certain sites were improperly included in the sites inventory. (OB at 15:6-17:1.) Petitioner maintains that the City did not make the findings based on substantial evidence that are required to rebut the presumption under section 65583.2(g)(2) that the existing use will impede additional residential development. (Reply at 4:13-14.)

However, in contending that additional residential development is not possible on certain sites, petitioner relies on extra-record evidence. For example, for 55 North La Cienega, the sites inventory indicates that the property will have 70 low-income units. (JR 229.) However, petitioner presents a Planning Commission Report and meeting minutes to assert that the City's Planning Commission approved development on the site with only 11 units of very low-income housing. (Gelfand Decl. Exs. C at 1, D at 3-4.)

"[W]here the scope of review of factual findings is substantial evidence, review limited to the administrative record is appropriate because extra-record evidence is irrelevant to whether the agency's decision is supported by substantial evidence." (*Cinema West, LLC v. Baker* (2017) 13 Cal.App.5th 194, 208.) Petitioner cannot challenge the inclusion of sites in the inventory based on extra-record evidence. Ironically, petitioner would have the Court consider the propriety of certain sites based on extra-record evidence, but then bar respondent from presenting extra-record evidence to rebut petitioner's argument. (Reply at 4:18-5:13.)

With respect to sites which petitioner contends are unlikely to disappear based on their existing use (OB at 16:21-17:2; JR 1557-58), the Court already finds that respondent did not make findings based on substantial evidence that the existing use for each nonvacant site in the sites inventory is likely to be discontinued. The City must make such findings in revising the housing element.

VI. Conclusion

The petition is GRANTED. Pursuant to Local Rule 3.231(n), petitioner shall prepare, serve, and ultimately file a proposed judgment and proposed writ of mandate.

Date: September 12, 2023

HON. CURTIS A. KIN

23CV-21053

CALIFORNIANS FOR HOMEOWNERSHIP

CAL HDF

Dec 1, 2025

San Francisco Board of Supervisors
49 South Van Ness Avenue
San Francisco, CA 94103

Re: Housing Element Implementation

By email: Lisa.chen@sfgov.org, Board.of.Supervisors@sfgov.org, bos@sfgov.org, bos-supervisors@sfgov.org, ChanStaff@sfgov.org, ChenStaff@sfgov.org, DorseyStaff@sfgov.org, Jackie.Fielder@sfgov.org, MahmoodStaff@sfgov.org, MandelmanStaff@sfgov.org, MelgarStaff@sfgov.org, SauterStaff@sfgov.org, SherrillStaff@sfgov.org, Shamann.Walton@sfgov.org

Cc: john.carroll@sfgov.org; sarah.dennis-phillips@sfgov.org; cityattorney@sfcityatty.org

Dear San Francisco Board of Supervisors,

The California Housing Defense Fund ("CalHDF") and Californians for Homeownership ("CFH") write in advance of the Land Use and Transportation Committee meeting scheduled for December 1, 2025 at 1:30pm. We write to warn the Committee, as well as the larger Board, that certain elements of the proposed Family Zoning Plan violate state law. Specifically:

1. The City's proposed rezonings will not produce sufficient new housing. This violates commitments the City made when it adopted its Sixth Cycle Housing Element.

2. The City's proposed rezonings add new constraints on housing production. This, again, violates commitments the City made in its Sixth Cycle Housing Element and independently violates the Housing Element Law.

3. The "Housing Choice - San Francisco" program seeks to exempt San Francisco from certain state housing laws. That is illegal.

If the City does not correct these problems, CalHDF and CFH will challenge the City in court. As a result of the lawsuit, the City would, potentially, fall out of compliance with the Housing Element Law and face exposure to the "builder's remedy." (See Gov. Code, § 65589.5,

subds. (d)(5), (d)(6).) CalHDF and CFH urge the City to avoid such needless litigation and instead comply with the law in the first instance.

The City's Proposed Rezonings Are Inadequate

The Housing Element Law (Gov. Code, §§ 65580 et seq.) establishes a clear process for the evaluation, planning, and enactment of the City's housing policy. That process has a two-part structure. In the first part, the City must adopt a housing element on a specified timeline and that meets certain requirements. In the second part, the City must implement the programs promised in its housing element. Crucially, the second step relies on the first step: what, precisely, the City must do in the second step has already been established by the housing element. (See Gov. Code, § 65583, subd. (c).) The second step is *not* a freestanding exercise in policymaking or policy analysis. (See *id.*) The policymaking and policy analysis are conducted in the first step, and the Housing Element Law leaves essentially no room to alter the results at the second step.[1]

San Francisco has completed the first step. It adopted a housing element on January 31, 2023, adhering to the substantive and procedural rules in the Housing Element Law. The California Department of Housing and Community Development ("HCD") also certified the City's adopted housing element as legally compliant, pursuant to its statutory authority. (See, e.g., Gov. Code, § 65585.) That housing element made numerous detailed commitments. These commitments include promises to rezone large areas of the City to accommodate housing growth necessary to meet demand and ease upward pressures on housing costs. (See Gov. Code, §§ 65583 [establishing standards for required rezonings]; 65583.1 [same]; 65583.2 [same].) The housing element, moreover, promised not only to rezone, but to engage in detailed analysis that would help shape the rezoning. (See Program 7.1.1 in San Francisco's Housing Element, available here.)

San Francisco is now at the second step of the process: implementing the commitments in its housing element. This includes the aforementioned rezoning and associated policy analyses. The City's proposed rezoning, however, fails to fulfill crucial aspects of housing element commitments – commitments that the City, as explained above, cannot renege on without going through a full amendment process for its housing element.

Program 7.1.1 of the City's housing element commits the City to implementing a rezoning program that "reasonably account[s] for sites' likelihood of development during the planning period using an analytical model." The housing element uses mandatory language, stating that the City "shall" build its rezoning program around such a

[1] If the City wishes to alter the policy analysis or programs promised by its housing element, it has an avenue to do that: it may amend its housing element according to the procedures set forth in Government Code section 65585. But the process remains a two-step process: the City must first amend its housing element, and only then can it proceed to the second step of implementing the promised housing element programs.

"probability-of-development" analysis. In sum: the City must rezone to an extent that the expected number of new units that will be built after the rezoning, calculated via a robust probability-of-development analysis, meets the City's projected housing need (i.e. the Regional Housing Needs Assessment, or "RHNA," allocation, plus a buffer specified in the housing element).

The current rezoning proposal does not do this. The proposal's failure is twofold. First, none of the methods the Planning Department has relied on to assess whether the proposal will satisfy San Francisco's rezoning obligation constitutes a probability-of-development analysis using an analytical model in line with Program 7.1.1 in the housing element. Second, when the City has conducted an analysis that meets the requirements of Program 7.1.1, the analysis shows the current rezoning proposal will not satisfy San Francisco's rezoning obligation.

With respect to the rezoning proposal's first failure: the City proposes three methods to project the number of new units the proposed rezoning can be expected to produce. None of the three methods measures up to the standards in Program 7.1.1.

1. The first method is the "soft sites" method, which is described in appendix B of the City's housing element. This method assumes that a site currently hosting a residential use has a two percent probability of being redeveloped with the rezoning's planned residential capacity and a site currently hosting a non-residential use has a seventy percent probability of redevelopment. Such rigid calculations based on uniform, citywide assumptions about the odds of development on thousands of very different sites are not an "analytical model" and do not "reasonably account for sites' likelihood of development" as required by Program 7.1.1. These assumptions, furthermore, are not reasonable and do not rest on any evidence. They are highly motivated guesswork, and highly motivated guesswork will not cut the mustard.

2. The second method rests on an economic model developed by a consultant. This model does not assess the likelihood of a given site's being developed under the rezoning proposal. Instead, it calculates how many units of housing are "financially feasible" on parcels throughout the City. This is not an "analytical model" that "reasonably account[s] for sites' likelihood of development" as required by Program 7.1.1. As the City well knows, property owners across the City submit permit applications for only a small portion of economically feasible new housing units, and not all of those permit applications ultimately produce actual housing units. The City attempts to address this problem by assuming – similar to the soft sites method – that two percent of sites with economically feasible new housing developments currently occupied by residential uses and thirty-five percent of other sites with economically feasible new housing developments will be developed. This is inadequate for the same reasons the soft sites method is inadequate. Moreover, this

method projects only 19,000 new units of housing over the planning period – far below the 36,282 units the City must accommodate.

3. The third method involves looking at "how much of the City's overall zoning capacity has gotten built out over the years." This – again – is not an "analytical model." Nor does it look at the sites slated for rezoning under the current rezoning proposal and assess the likelihood they will produce new housing. This method is further flawed because much of San Francisco's recent increase in zoned capacity, and much of the new housing that has been built, took place on vacant sites, whereas the proposed housing element rezoning covers a broad swath of the City and comprises mostly non-vacant sites. Other problems here include unrealistically low estimates of the City's residential zoning capacity in prior years (thus inflating the share of residential zoned capacity that has been built out) and the inclusion of residential projects built under development agreements, which do not correspond to rezonings, and which were separately counted towards the City's pre-existing residential zoned capacity in the housing element.

With respect to the rezoning proposal's second failure, analytical models that would satisfy Program 7.1.1 in the housing element demonstrate that the proposed rezoning will not produce anywhere close to the required number of new units. San Francisco's City Economist recently released an analysis of the City's proposed rezoning. This analysis relies on the exact approach that San Francisco's Housing Element pledged to use: an analytical model that assesses the probability of development. (Indeed, it is the exact approach HCD suggested the city use.) The results are damning. In the **best case scenario,** San Francisco's City Economist's analytical model found that the rezoning can only be reasonably expected to produce around **14,646 units by 2045**. Less optimistic assumptions produce a forecast of only 8,504 units by 2045. This indicates the rezoning plan falls far short of what is required: being shown by an analytical model to reasonably be expected to produce **36,282 units by 2031**.

Changes to the planned rezoning since the analysis was conducted have further reduced the amount of new housing that can be expected. The proposed rezoning – specifically, the "Housing Choice - San Francisco" program – has been modified to add new unit mix requirements (see pages 14-15 here) and historic preservation requirements (page 30). The Land Use Committee made these changes despite unambiguous evidence in the record that the changes would reduce new housing's feasibility and reduce the number of new units the rezoning can be expected to create. The problem, then, is *even greater* than what the City Economist's analysis shows.

These are not minor problems. Program 7.1.1 is central to San Francisco's compliance with the Housing Element Law. The City's housing element meets the requirements of the Housing Element Law *only because* it included Program 7.1.1's commitment to rezone based

on a realistic probability-of-development analysis. To be crystal clear: without Program 7.1.1, the housing element does not comply with Government Code section 65583.2, subdivision (g)(2). This is because the housing element relies on non-vacant sites to accommodate more than half of its RHNA allocation at the lower-income level, and thus the Housing Element Law requires its housing element to "demonstrate that the existing use [on each non-vacant site] does not constitute an impediment to additional residential development." (Gov. Code, § 65583.2, subd. (g)(2).) "An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued." (*Ibid.*) San Francisco's housing element does not demonstrate with substantial evidence that specific existing uses on specific sites intended to accommodate low-income housing will not impede additional residential development. Instead, the housing element commits the City, in Program 7.1.1, to rezoning in a manner that "shall reasonably account for sites' likelihood of development during the planning period using an analytical model." That commitment is the basis of the City's compliance with Government Code section 65583.2, subdivision (g)(2). Refusing to follow through on that commitment would leave the City without any basis for compliance with the Housing Element Law on this point.[2]

CalHDF and CFH urges the City to do as the law requires. The City must adopt a rezoning that an analytical model, such as the City Economist's, shows can reasonably be expected to produce 36,282 new units under current economic conditions, as required by Program 7.1.1. Alternatively, the City can increase the probability of sites' development (again, according to a realistic analytical model) by adjusting non-zoning policies that constrain housing production: the City could, for example, reduce transfer taxes for residential projects, impact fees for new residential construction, or inclusionary zoning requirements. The City should not – it cannot – rely on flawed and insufficient analyses to justify its planned rezonings. Doing so violates the law.

The City Must Reduce Constraints on Housing Production, Not Add New Ones

The City's planned rezoning, although on net it adds new capacity, includes constraints on housing development that do not exist under current zoning rules. Specifically, the proposal includes minimum office densities, caps on dwelling unit size, new limits on curb cuts, and lower parking maximums. Furthermore, the City's proposed local zoning bonus program, known as the "Housing Choice–San Francisco" ("HCSF") program, imposes new limitations on residential projects' eligibility for protections and benefits under state laws, including the Statewide Density Bonus Law.

[2] The City could address this issue by producing site-specific evidence that existing uses on non-vacant sites will not impede additional residential development, adding that evidence to a new draft of its housing element, and adopting the amended housing element. But – again – the City would have to do this before rezoning. The process of developing and adopting housing element commitments and then, separately, implementing those commitments remains a two-step process.

CalHDF and CFH also note that the HCSF program was amended in committee on November 17, 2025 to include additional constraints. The HCSF program now virtually excludes any site in a historic district (see page 30 here). The HCSF now also imposes additional unit mix requirements on new housing projects (see pages 14 and 15 here). With respect to the unit mix requirements, it is silly for San Francisco, a City defined by large, multi-bedroom homes, to require new housing to replicate the bulk of existing housing supply in its bedroom counts. If new housing proposals include fewer bedrooms per unit, on average, that is because San Francisco's existing housing stock is already dominated by multi-bedroom homes; it is natural that new housing will fill a niche that the current housing supply does not.

More importantly, the new unit mix requirements, as well as other new constraints on housing, pose a problem for two reasons.

First, the new constraints were not analyzed by the City's housing element. The Housing Element Law requires local governments to analyze governmental constraints on housing production. (Gov. Code, § 65583, subd. (a)(5).) The results of this analysis then inform the policies and programs in the housing element. (See *id.*; *id.* at subd. (c)(3); *Californians for Homeownership, Inc. v. City of Beverly Hills* (2023) Los Angeles County Superior Court, Case No. 23STCP00143, at p. 6, [finding planned rezonings for housing element site inventory must consider constraints identified by the housing element's constraints analysis] [opinion attached to this letter].) Because the new constraints attached to the City's rezoning proposal were not analyzed in the City's housing element, the City cannot rely on the rezoning proposal to produce as many units as it is required to unless the City analyzes the effects of the new constraints and offsets their impact on housing production.

Second, the City's housing element explicitly recognizes this and commits the City to refrain from adding new constraints. Program 7.1.1 states: "The rezoning program … shall not add government constraints that reduce project financial feasibility as determined by an analysis prior to the rezoning enactment." Program 8.1.6 states: "[A]ny City-adopted rezoning or development controls shall not impose any new governmental constraints to the development of housing unless those increased constraints are offset by the removal or reduction of other constraints." If San Francisco wishes to establish new governmental constraints to housing production (such as making new developments ineligible for the waivers and protections offered by State Density Bonus Law), it must concurrently reduce other constraints to a degree that maintains the overall viability of new residential construction, "as determined by an analysis prior to the rezoning enactment" that assess projects' "financial feasibility." Pursuing the new constraints without offsetting them by reducing existing constraints, however, would violate the commitments in housing element programs 7.1.1 and 8.1.6 and hence violate the Housing Element Law.

The Proposed Housing Choice–San Francisco Bonus Program Cannot Exempt San Francisco from State Law

The proposed HCSF bonus program provides additional residential zoning capacity for projects that meet certain criteria. Overall, this is good. However, one of the HCSF eligibility criteria poses a problem: the requirement, found in section 206.10(b)(5), that an HCSF project "not receive any density or development bonuses or relief from applicable Planning Code standards in any other State or local law or program." This requirement is unenforceable to the extent it pertains to state law, and, should it be enacted, developers will have the option to ignore it.

This is for four reasons. First, the City "cannot choose to forgo application of land use policies imposed by the Legislature." (*Ailanto Properties, Inc. v. City of Half Moon Bay* (2006) 142 Cal.App.4th 572, 595.) Second, just as the City cannot waive state law's application, project applicants cannot waive protections to which they are entitled under state law, since those protections are designed to serve the public interest. (See Civ. Code, § 3513 ["a law established for a public reason cannot be contravened by a private agreement"].) Third, the SDBL includes explicit rules for local density bonus programs: such programs must build on, rather than supplant, the SDBL. Finally, even if the first three points are ignored, the SDBL allows project applicants to waive the HCSF eligibility requirement forbidding the use of state bonuses. (Gov. Code, § 65915, subd. (e).) Legal interpretations from the California Department of Housing and Community Development ("HCD"), the state agency charged with interpreting and enforcing state housing law, support these conclusions.

Background

State law contains many provisions that grant rights and protections to proposed housing developments and applications for proposed housing developments. These include AB 2011, codified at Government Code section 65912.100 et seq., the SDBL, codified at Government Code section 65915 et seq., SB 35, codified at Government Code section 65913.4, and more besides. These laws accomplish a variety of pro-housing policies by, among other things, allowing proposed housing developments that meet certain criteria (such as the inclusion of affordable units) to reduce or avoid local zoning and other land use restrictions. In some cases, whether a project is eligible for state law protections and the extent to which it may reduce or avoid local rules depends on the generosity of the local zoning code. For example, the SDBL calculates density bonuses using a "base density," defined as "the greatest number of units allowed under the zoning ordinance, specific plan, or land use element of the general plan." (Gov. Code, § 65915, subd. (o)(6).)

The proposed HCSF program expands the San Francisco zoning code's accommodation for denser housing in much of the City. The aforementioned state laws then further expand the allowed range of housing projects, providing for even greater density and even more

forgiving standards for projects. But there is a catch: the HCSF program attempts to forestall these state laws, in section 206.10(b)(5). If not for proposed section 206.10(b)(5), housing project applicants would be able to propose projects under the HCSF rules and avail themselves of the full range of state law protections. Thus, the critical question is: does proposed section 206.10(b)(5) have any legal effect? As explained below, the answer is no. Developers may use both the HCSF rules and any state law bonuses or protections that apply.

The City Cannot Forgo the Application of State Law

State law preempts local law. (Cal. Const., art. XI, § 7.) This is a foundational constitutional principle, and it is no less true in the land use context than anywhere else. As a corollary to this principle, local governments "cannot choose to forgo application of land use policies imposed by the Legislature." (*Ailanto Properties*, *supra*, 142 Cal.App.4th at 595.) Proposed section 206.10(b)(5), however, attempts to do exactly that: it states, in effect, that state land use laws do not apply to projects proceeding under the HCSF program. The City is careful to word the section to dance around the point, perhaps in recognition of the legal consequences, but the section's intended purpose is unmistakably to "forgo application of land use policies imposed by the Legislature," as caselaw and the California constitution forbid. (*Ibid.*)

As explained above, numerous state laws – particularly the SDBL – grant certain housing projects legal protections. None of these state laws allows local governments to circumvent or opt out of these rules. The attempt to do so, in section 206.10(b)(5) of the proposed HCSF program, does not pass legal muster, and project applicants will be entitled to ignore it.

Project Applicants Cannot Waive State Law Protections to Which They Are Entitled

Just as the City cannot waive the application state land use and housing laws, neither can developers. "[A] law established for a public reason cannot be contravened by a private agreement." (Civ. Code, § 3513.) In other words, if a law is designed to accomplish a public benefit (possibly in addition to private benefits), the law's provisions cannot be waived. (See, e.g., *County of Riverside v. Superior Court* (2000) 86 Cal.App.4th 211, 220 [holding employment protections for public safety officers, although they benefitted individual officers, also served a broader public purpose and could not be waived].) The legislature has made clear that pro-housing laws serve the broader public interest.[3] (See, e.g., Gov. Code, §§ 65915, subd. (u); 65913.4, subd. (u); 65582.1; Stats. 2024, ch. 294, § 1; Stats. 2023, ch. 783, § 1.) The legislative history for these laws, moreover, confirms they are intended to serve the public by

[3] On one occasion, California courts found that a law establishing time limits for housing permit application processing primarily benefitted project applicants and not the general public, and hence project applicants could waive them. (*Bickel v. City of Piedmont* (1997) 16 Cal.4th 1040, 1049-1052.) The legislature immediately rebuked the Courts and overturned the *Bickel* holding through legislation. (See *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1439.)

expanding the supply of housing and affordable housing. (See *Doskocz v. ALS Lien Services* (2024) 102 Cal.App.5th 107, 115-116 [legislative history is relevant in deciding whether law serves a public purpose and hence cannot be waived].) Hence, project applicants have no authority to disclaim the application of these laws, as the City's proposed HCSF program would have them do.

Two additional reasons prevent project applicants from waiving their right to pursue state law protections.

First, as with all legal waivers, such a waiver must be voluntary. (*Harvey v. County of Kern* (1930) 107 Cal.App. 590, 597.) As currently framed, the HCSF program does not ask project applicants to voluntarily waive their state law rights. It instead makes waiver *mandatory* for any project applicant. No waiver can occur through such an ultimatum; to the extent that the issue is unclear, moreover, the ambiguity resolves against the existence of a waiver. (See *Perini v. Perini* (1964), 225 Cal.App.2d 399.)

Second, waiver requires "an abandonment of a right that could be enforced or a privilege that could be exercised." (*Estate of Goyette* (1971) 14 Cal.App.3d 224, 232 [internal citations omitted].) Thus, for an applicant to be able to waive the application of state law to an HCSF project, it must be the case that the applicant could, absent the waiver, enforce the application of the relevant state law. And it must be the case, from there, that the applicant could choose *not* to waive their rights and instead apply state law protections and bonuses to their project. In this way, the City faces a catch-22, and however it resolves the dilemma, developers will be able to use both the HCSF program and state law.

The State Density Bonus Law Creates Narrow Guidelines for Local Bonus Programs, Which the HCSF Program Does Not Obey

The SDBL does allow local governments to implement local bonus programs. It includes strict rules for such programs, however, which the proposed HCSF program does not meet. Local bonus programs must add to, rather than supplant, the SDBL. Government Code section 65915, subdivision (n), states: "nothing in this section shall be construed to prohibit a city, county, or city and county from granting a density bonus *greater than* what is described in this section for a development that meets the requirements of this section" (emphasis added). By negative implication, local governments are forbidden from offering density bonuses that do not incorporate, at minimum, the bonuses allowed by the SDBL. Local bonus programs must add to the SDBL; they cannot displace it in favor of an entirely separate density bonus scheme. As described above, moreover, preemption principles prevent local governments from evading the SDBL, and this language in the SDBL confirms that outcome.

The SDBL includes stronger language too. Government Code section 65917 states:

> In enacting this chapter it is the intent of the Legislature that the density bonus or other incentives offered by the city, county, or city and county pursuant to this chapter shall contribute significantly to the economic feasibility of lower income housing in proposed housing developments. **In the absence of an agreement by a developer in accordance with Section 65915, a locality shall not offer a density bonus or any other incentive that would undermine the intent of this chapter.**

(Emphasis added.) In other words, if San Francisco wishes to offer a density bonus to developers, it must first allow them any protections they are entitled to under the SDBL. Only then can it offer a local bonus program. The law establishes a clear baseline: project applicants may avail themselves of any bonuses and benefits they are entitled to under the SDBL, and further local bonuses and benefits must come on top of the SDBL.

These rules are especially important in San Francisco. HCD has found that the SDBL is "critical" for developers navigating San Francisco's complex zoning rules and extensive procedural hurdles. (See "Examining Local Law, Policy, and Planning Practice on Development in San Francisco Using CALES," O'Neill et al., pp. 38-39 (available here and attached to this letter).) In some cases, HCD has issued Notices of Violation to San Francisco for impeding housing development by refusing to grant bonuses, incentives, and waivers allowed by the SDBL. (See, e.g., California Department of Housing and Community Development, Letter to Kate Conner, December 29, 2022 (available here).) These HCD findings and Notices of Violation confirm the SDBL's importance in producing housing in San Francisco.

The proposed HCSF program, by attempting to displace the SDBL entirely, violates the SDBL's explicit rules for a local bonus program. This violation carries particular significance for San Francisco, where project applicants often rely on the SDBL to navigate a complex zoning code and approval process. If San Francisco wishes to implement a local bonus program, it must stack that program on top of the SDBL. It cannot offer an "alternative" bonus program, such as the proposed HCSF program, that attempts to remove SDBL eligibility for projects that are eligible for SDBL protections.

In closing this section, CalHDF and CFH point out that HCD has weighed in on the question of whether local governments may enact zoning bonus programs that serve as alternatives to state law. In a letter to Menlo Park (available here), the Department wrote: "[T]he City's Affordable Housing Overlay states that the overlay will be an alternative to state density bonus law. **This is in conflict with state law and must be revised."** (Emphasis added.)[4] HCD's

[4] Separately, as explained later in this letter, HCD's Site Inventory Guidebook (available here) analyzes whether zoning overlays or other local zoning programs established by a city's housing element may supplant or displace the SDBL and firmly establishes that they cannot. (See pages 14-15 of the guidebook.) This analysis is more relevant to the question of how the HCSF program will affect the City's compliance with the Housing Element Law, but this analysis also underscores the specific point that the City may not wriggle out of state law.

view warrants substantial deference as the interpretation of a "technical, obscure, [or] complex" statutory scheme by the agency charged with enforcing it. (See *Boling v. Public Employment Relations Bd.* (2018) 5 Cal.5th 898, 911 [citing *Yamaha Corp. of America v. State Bd. of Equalization* (1998) 19 Cal.4th 1, 12]; *Hoffmaster v. City of San Diego* (1997) 55 Cal.App.4th 1098, 1113, fn. 13 ["We substantially rely on the Department of Housing and Community Development's interpretation [...] regarding compliance with the housing element law"].)

Even if the City Can Prohibit the Application of State Law, the Density Bonus Law Gives Project Applicants the Legal Right to Circumvent the City's Prohibition

Even if the above legal rules do not neutralize the City's attempt to avoid state law, any project eligible for the SDBL will be able to defeat the application of proposed section 206.10(b)(5). The SDBL states: "In no case may a city, county, or city and county apply any development standard that will have the effect of physically precluding the construction of a development meeting the criteria of subdivision (b) at the densities or with the concessions or incentives permitted by this section." (Gov. Code, § 65915, subd. (e)(1).) If a proposed project complies with the HCSF except for section 206.10(b)(5) – because it seeks benefits under the SDBL or another state law – and the application of section 206.10(b)(5) would physically preclude the project by eliminating its eligibility for the HCSF, then the City cannot apply that section to the project. To the extent the City doubts or intends to contest this, CalHDF and CFH remind the City that the SDBL, by its terms, "shall be interpreted liberally in favor of producing the maximum number of total housing units." (*Id.* at subd. (r).) Flouting the law on this point also carries severe penalties, including mandatory payment of attorney's fees to a project applicant who challenges the City in court. (*Id.* at subd. (e)(1).)

The HCSF Program Violates the Housing Element Law

Furthermore, the HCSF violates the Housing Element Law (Gov. Code, § 65580 et seq.). Rezoning programs enacted pursuant to a housing element, such as the proposed Family Zoning Plan and its component HCSF program, may not exempt themselves from state law's application, as HCD has explained in its Site Inventory Guidebook (available here – see pages 14-15). Pursuing the HCSF program as it is currently designed would violate this rule and risk the City's housing element compliance. This would expose it to a range of penalties, including the "builder's remedy."

The City Should Take Care to Comply with New Caselaw Concerning Housing Element Rezonings

Lastly, CalHDF and CFH warn the City to take care to ensure that the rezoning complies with housing element law requiring minimum residential density on low-income sites. The newly published Court of Appeal decision *New Commune DTLA LLC v. City of Redondo Beach* (Oct. 10, 2025, No. B336042) 115 Cal.App.5th 111 makes clear that in order to comply with

minimum density requirements, local zoning must require that all new development include a minimum density of residential use. Zoning "overlays" that allow for 100% non-residential development on a site fail to comply with housing element law. The proposed zoning includes many low-income sites that are given additional residential density on top of base commercial zoning. In order to comply with housing element law, the City should make clear that all new development of these sites must include the minimum density of residential use, and that 100% commercial development is prohibited.

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New multifamily housing in San Francisco a public benefit: it will help satisfy demand for housing near jobs and transit, thereby reducing displacement pressure; and it will also cut down on transportation-related greenhouse gas emissions by providing housing in a major metro area, as opposed to farther-flung regions in the state (and out of state). CalHDF and CFH therefore urge the City to follow through on the commitments in its housing element, as the law requires, and obey state law in drafting and enforcing its land use regulations.

Sincerely,

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Dylan Casey
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Examining Local Law, Policy, and Planning Practice on Development in San Francisco Using CALES

Report in Support of San Francisco Policy and Practice Review

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Executive Summary

Background: Why Study San Francisco?

San Francisco is the anchor city in the Association of Bay Area Governments (ABAG) region, with one of the highest Regional Housing Needs Allocations (RHNA) statewide. Complex processes that lead to delayed housing development approvals leave open questions about whether San Francisco's local legal regime will allow the city to meet this housing production target.

In 2016, authors O'Neill, Biber, and students launched the Comprehensive Assessment of Land Use Entitlements Study (CALES) at the University of California, Berkeley, to understand how cities, including San Francisco, design and apply local and state law to proposed developments of five or more units approved in 2014 - 2017. In an earlier report,[1] we found San Francisco's local regulatory regime comparatively prohibitive, risking exclusionary zoning despite explicit policies to promote inclusion and fair housing goals through inclusionary housing programs, rent stabilization, and tenant protections. Among the 28 jurisdictions we studied, San Francisco was among the cities with more land zoned for dense housing, although that zoning was not equitably distributed citywide. But most notable, among all our study cities, San Francisco was an *extreme* outlier in process requirements and timeframes to approval. The city had a median timeframe to entitlement of over two years for code compliant multi-family housing that benefited from streamlined environmental review.

San Francisco's median timeframe was not only longer than its neighbors, it was longer than timeframes in neighboring cities with purportedly more difficult local law. Berkeley, for example, has complex rules that require a use permit[2] for all new housing development, and yet the median timeframe to entitlement was four months shorter for comparable multi-family housing. Moreover, once we parsed out our data to explore how environmental review streamlining might impact timelines, we found that Berkeley's median timeframe dropped to less than 10 months for apartment buildings, whereas San Francisco's remained at 24 months for the *same type of housing*. San Francisco exemplified how cities can write and implement procedural rules in a manner that creates uncertainty of approval. Uncertainty creates risk, and risk influences what developers will propose and build, as well as which developers will consider developing within a city. During our research, affordable developers who worked in neighboring cities explained they could not work within San Francisco because entitlement was too uncertain and difficult.

California's legislature has passed nearly 100 laws relevant to housing policy since 2016.[3] These laws seek to spur housing production across all income levels and promote equitable housing outcomes—namely increased housing production in high opportunity locations. Many important changes to state housing law target subjectivity in discretionary processes, like

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[1] We refer here to our Report to the California Air Resources Board in fulfillment of Contract #3900-19STC005. MOIRA O'NEILL-HUTSON ET AL., EXAMINING ENTITLEMENT IN CALIFORNIA TO INFORM POLICY AND PROCESS: ADVANCING SOCIAL EQUITY IN HOUSING DEVELOPMENT PATTERNS (2022). We also cross reference prior publications.

[2] Project proponents apply for a use permit, often referred to as a conditional use permit, when local rules allow for certain uses subject to approval—but not as a matter of right under the local zoning.

[3] *See* Ben Metcalf, Managing Dir., UC Berkeley, Terner Ctr. for Hous. Innovation, Presentation at the California Joint Oversight Hearing with Assembly Housing and Community Development Committee: Housing Production: Recent Legislative Actions and Outcomes (Feb. 28, 2023), https://shou.senate.ca.gov/node/21.

planning review,[4] and work towards quickening approval processes, particularly for multi-family housing. New law and policy aim to accelerate housing production in high opportunity areas, inviting important questions about how well San Francisco has implemented these laws and whether they effectuate production, affordability, and equity. To answer these questions, we expanded and extended CALES to explore San Francisco's local land use regulation in more detail and identify specific roadblocks to dense multi-family housing. This report details our methods, presents findings, and discusses their implications for the California Department of Housing and Community Development's (HCD) Policy and Practice Review.

Research Questions and Approach

HCD asked (1) whether San Francisco is fully implementing key state housing laws, such as the Housing Accountability Act, the Housing Crisis Act, the Permit Streamlining Act, Senate Bill 35 (SB 35), and State Density Bonus Law; (2) whether local implementation is allowing these state laws to achieve their intended effect of promoting housing production and affordability; (3) what causes delay in the entitlement process and how the city's discretionary review process impacts overall project timelines and the housing approvals pipeline.

To answer these questions, we used a spiraling mixed methods research design that joins legal research and qualitative, quantitative, and spatial analyses to understand San Francisco's local regulatory environment. This design helped our study overcome some of the limitations of each method and allowed us to adapt our research approach to the specific needs of studying San Francisco.

HCD's questions one and two require us to interpret our data and provide findings based on our interpretation of what state law requires of localities.[5] For example, we interpret the Permit Streamlining Act, Housing Accountability Act, and Housing Crisis Act as applicable to all multi-family housing approvals in San Francisco that do not require a local legislative action. We define "full implementation" of these state laws to mean that San Francisco both complies with state law, but also that local rules or planning practices do not effectively circumvent the purpose of the limitations imposed on cities by state law.

We built a unique and highly detailed dataset of 140 planning entitlements[6] of five or more units issued in 2014 - 2017. We added 144 observations of entitlements and SB 35 approvals issued

[4] For a discussion of what characterizes a discretionary action, see Friends of Westwood, Inc. v. City of Los Angeles, 181 Cal. App. 3d 259, 269-74 (1987). When city employees can set standards and conditions for many aspects of a proposed building, the approval process is discretionary. For a definition of a ministerial process in California law, see Prentiss v. City of S. Pasadena, 15 Cal. App. 4th 85, 90, 18 Cal. Rptr. 2d 641 (1993) (citing CAL. CODE REGS., tit.14, § 15268(b)(1) (2023)("'Ministerial' describes a governmental decision involving little or no personal judgment by the public official as to the wisdom or manner of carrying out the project. The public official merely applies the law to the facts as presented but uses no special discretion or judgment in reaching a decision. A ministerial decision involves only the use of fixed standards or objective measurements, and the public official cannot use personal, subjective judgment in deciding whether or how the project should be carried out.")). Importantly, ministerial decisions are exempt from environmental review under the California Environmental Quality Act.

[5] We discuss this in the report; our analysis depends on some assumptions about what "full" implementation of state law would entail.

[6] We refer to "entitlement" as a process and "entitlement" as an observation of that process in the singular and plural throughout this report. Entitlement refers to the type of housing approval that a project proponent secures from the Planning Department, Planning Commission, or Board of Supervisors when

in 2018 - 2021 to this dataset.[7] Our approvals dataset captured detail on each application and approval step under local rules and state law (like the California Environmental Quality Act, or CEQA) and important project characteristics (like affordability, building size, and location). We gathered the detail for our dataset from source documents (application documents, planning staff reports, and motion and resolution documents) wherever possible. We analyzed our data using statistics and mapping.

We conducted in-depth interviews and used participant observation and primary document analysis to understand why San Francisco's approval process operates the way that it does. We analyzed more than 35 hours of confidential in-depth research interviews with 24 participants representing affordable and market-rate developers, former and current city personnel and staff that work on housing development, land use attorneys, and housing advocates.[8] We observed and analyzed notes and transcripts from another 33 meetings that HCD convened with approximately 146 stakeholders. Most were approximately one hour long. Twenty-five of the HCD-led meetings were very small, with one to three participants, in addition to O'Neill and one representative from HCD. The small meetings allowed participants to offer deep insights, much like research interviews. In all, we analyzed notes and transcripts from ~68 hours of research interviews and meetings with 14 individuals across the executive and legislative bodies within San Francisco, over 20 former and current planning staff, more than 60 development professionals (evenly split between affordable and market-rate developers), and 6 different housing advocacy groups. We analyzed materials to extract themes and looked for frequency of themes across stakeholder groups. We also cross-referenced written law, recordings from hearings, approval documents, and analyses from our entitlement data.

Limitations of Research Approach and Analysis

Each method and data point has some limitations. For example, each observation in our approval dataset represents a potential housing or mixed-use development that developers believed had a high enough probability of success that they were willing to pursue entitlement in the first place. There are no project denials in the database to allow for quantitative analysis, but we do have limited data on a few denials we examined during data collection. Gathering data on project denials in a systematic way (for quantitative analysis) would demand substantially expanding the scope of the research project, which was not feasible given the research timeframe. Further, defining a project denial for data collection and analysis is more complex than defining an entitlement. A denial includes what the city reports as a denial but should also include projects that the city effectively "denied" (where a political body denied a specific entitlement, for example) even though the project remains pending within the city's public portal

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the local law reviews a proposal to build housing through a discretionary process. Discretionary review is a legal concept that means the city can set standards and conditions for many aspects of a proposed building and the approval process is discretionary. An entitlement typically precedes the building permit process, and it is a process that involves planning department review of a proposal to build housing and potentially requires an approval from a local elected or appointed political body. A ministerial process involves a public official applying law to fact without discretion or subjective judgment. Often, building departments issue ministerial approvals. Uniquely, state law creates a ministerial process that also involves planning review—which we discuss at length in the full report.

[7] Corrected Annual Progress Reports helped us identify 11 observations late in our research process. We were able to code essential characteristics for these 11 observations to include them in our summary statistical analyses only.

[8] Eighteen participants sat for interviews in 2022 - 2023, and several participated in more than one interview. We also analyzed transcripts from six interviews across the same stakeholder groups in San Francisco (affordable developers, planners, market-rate developers, and community-based organization advocates) that O'Neill conducted in 2017, where comparisons with prior years was useful.

or in its annual reporting. For the purposes of research, a denial could also include a project from which a developer appears to voluntarily withdraw after the city determines that it will not approve the project or will impose conditions that render the project infeasible. There also may be no documentation to verify whether a project that appears to be pending has effectively been denied. In our work, however, where we come across developments that have advanced in the entitlement process but are ultimately denied, we do discuss those developments.

All interview participants volunteered, as did all participants in HCD-led meetings. Voluntary participation in interviews and research meetings increases selection bias and limits the generalizability of findings.[9] We increased the number of interviews in each stakeholder group and triangulated data and methods to augment the overall reliability of our findings from interviews where possible. Some topics do not allow for this, however. For example, developers may discuss why they are unwilling to apply for entitlement, but there is no other data to explore to understand what deters applications beyond what the interview participants shared.

Summary of Findings

HCD asked whether the data indicates San Francisco has fully implemented state housing law intended to promote housing production and affordability. **All data generally indicates that the answer is no.**

San Francisco's local rules embed subjectivity and uncertainty into review processes that state law says should be objective, time constrained, and, in some cases, certain. The city's authority to apply discretionary review to any permit, and the ease with which project opponents can appeal planning approvals and permits (including post-entitlement permits) to the Board of Supervisors or Board of Appeals fosters planning practices that limit full implementation of the Permit Streamlining Act, Housing Accountability Act, Housing Crisis Act, and in some instances, SB 35 and State Density Bonus Law. Planning staff are concerned about whether planning review will survive scrutiny from local political bodies, not the courts. Planning staff anticipate local political bodies will ignore planning recommendations and extend review processes if that is what neighborhood-level politics demand. Planning practices reflect this assumption, and local policy reinforces it. Developers interpret this planning practice as requiring more than what the law "on paper" demands through negotiation outside of public hearings to satisfy neighborhood interests. Developers perceive all planning approvals as uncertain and risky, even if the proposed development conforms to all zoning and planning standards. Eight years of approvals data confirms these perceptions. The risk and uncertainty embedded into local law has driven some developers to leave the San Francisco market and has deterred other developers from entering the market entirely.

Below, we elaborate on what the data tells us about the direct effects of specific state housing laws on San Francisco's housing approval process, what all data tells us about San Francisco's implementation of different state laws, and the relationship between local rules, planning practices, and lengthy entitlement outcomes. The report that follows details each finding.

[9] Selection bias refers to research participants not being fully representative of the group to which they belong. This limits our ability to interpret what we hear as the perspectives of a particular stakeholder group, generally.

SB 35 fixes planning review for eligible housing developments but is not a complete process fix.

Data shows San Francisco Planning diligently implemented SB 35. Approximately 36 professionals who work on affordable development unanimously reported that SB 35's ministerial process "fixed" planning review for affordable housing developments because the state law created certainty of planning approval where none existed previously. Stakeholder perceptions are borne out in the planning approval data. Table 1 shows that the median timeframe for planning approval for developments that applied only under SB 35 was ~3.4 months and could take up to eight months. In contrast, code compliant discretionary developments[10] requiring only a building permit had a median timeframe of two years and could take as many as four years.

Table 1: Timeframes to Planning Approvals Issued in 2018 - 2021 Selected Pathways

Process Category	Timeframe (Months)			
	Minimum	**Median**	**Mean**	Maximum
SB 35 only (N=9)[1]	0.89	3.42	4.24	7.62
Discretionary building permit only (N=13)	7.76	24.20	24.67	47.70

[1]This count does not include five applications that developers proposed as discretionary approvals, some before SB 35's enactment, that San Francisco later approved under SB 35.

Importantly, stakeholder interviews indicate SB 35 provided both affordable developers and planning staff relief from San Francisco's local rules. Data on how San Francisco Planning processed applications for development before SB 35 indicates Planning prioritized expediting 100% affordable developments.[11] Local law still limited how quickly planners could complete review for any development, including 100% affordable development that the city helped fund. In fact, the city entitled only five 100% affordable developments in 2014 – 2017, which would yield 567 units if built. The median timeframe to approval for these five 100% affordable developments was 15 months. In contrast, SB 35's ministerial process allowed San Francisco Planning to approve 14 100% affordable developments that would yield 1,663 affordable units if built. The median timeframe for the SB 35 100% affordable developments was less than 7.5 months, inclusive of developments that began as discretionary developments and later applied for SB 35 eligibility review. The median timeframe for 100% affordable housing developments that only applied for approval under SB 35 was less than three months. Most SB 35 developments also used State Density Bonus Law, so they were, on average, larger as compared with another three discretionary 100% affordable developments San Francisco approved in 2018 – 2021, or the five entitled in 2014 - 2017.

However, SB 35's effects are limited to planning review. All stakeholders still describe the post-entitlement approval process as subjective, lacking standardization and sufficient oversight.

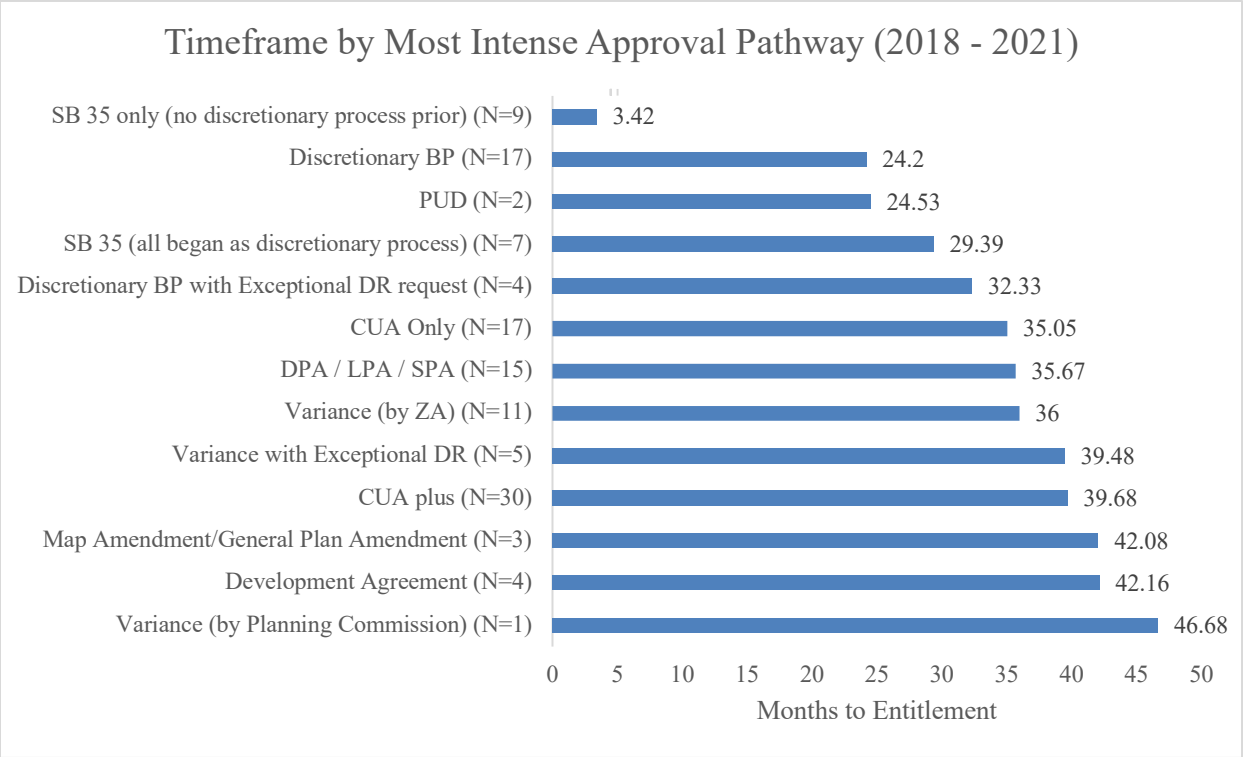
[10] Code compliant discretionary development means proposed housing development that conforms to all zoning and only requires a building permit. San Francisco law provides that this development is subject to discretionary review.

[11] Interviews at that time indicated internal work and analysis to expedite affordable development, but median timeframes for 100% affordable developments were still 15 months.

Stakeholders share that the post-entitlement permitting process depends entirely on the professional assigned to the project, not the project scope itself. Stakeholders report that subjectivity in the post-entitlement process can trigger additional planning review even after a project has moved to the Department of Building Inspection. Because SB 35 is limited to the planning review stage, the state law has no effect on these post-entitlement procedural issues. Developers share that because San Francisco's law offers opportunities for project opponents to challenge, or appeal, permits after entitlement, including demolition permits, SB 35 eligible projects are susceptible to process challenges after planning review as well.[12]

SB 35 also does not represent a complete fix for San Francisco's procedural challenges. SB 35 applies to qualifying projects so long as San Francisco keeps failing to meet its housing production targets. But missing housing production targets is not San Francisco's goal. **Still, San Francisco's implementation of SB 35 signals what is possible with a ministerial process while also spotlighting San Francisco's problematic existing discretionary review.**

Figure 1: Process Approval Pathway Timeframes



Graphic Developed by Dori Ganetsos using CALES data.

[12] The recent appeal of demolition permits for an SB 35 development located at 2550 Irving demonstrates this point.

Unpredictable discretionary review processes create uncertainty and risk—even for code compliant development of any size in any location citywide.

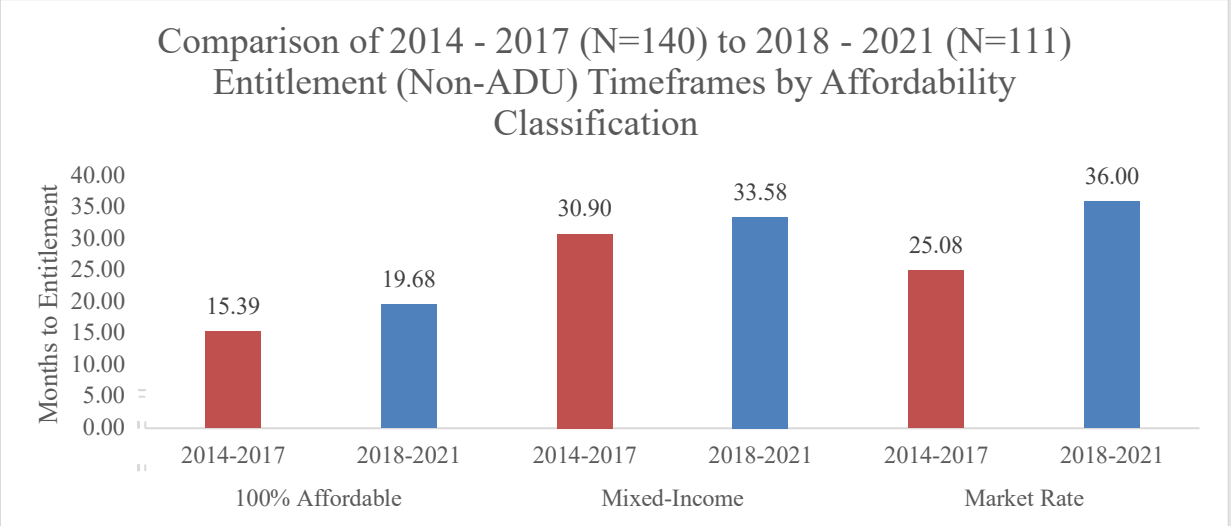
All permits in San Francisco are discretionary under local law unless preempted by state law[13] (like SB 35). Stakeholders describe the discretionary housing approval process in San Francisco as risky and unpredictable. Stakeholders report approval is uncertain even if the proposal conforms to all zoning and planning requirements. When we use different statistical methods to analyze the housing approval data, we also find that **no type of housing development is easy to entitle in San Francisco**. Even a smaller development that conforms to zoning and planning requirements faces unpredictable timeframes. When we analyze the approvals data to explore relationships between specific approval requirements and timeframes, we discover that there are factors—like affordability classification, project size, and location—outside of what zoning and planning standards require that influence timeframes. This suggests that these other factors might play a substantial role in whether and how a project gets entitled, even when a project conforms to all planning standards and zoning.

Timeframes for discretionary approvals increased.

Our 2018 - 2021 approvals data indicates that entitlement timeframes have increased as compared to the prior four years. The median timeframe for discretionary approvals of five or more units issued in 2014 - 2017 was 27 months. In 2018 - 2021, the median timeframe for the same climbed to 34 months—more than a 25% increase. Figure 2 shows that in both study periods, 100% affordable development moved comparatively faster: 100% affordable development requiring discretionary review had median approval timeframes of ~15 months in 2014 - 2017 and ~20 months in 2018 – 2021. Both periods show that the city can quicken the process, to some degree, for affordable development. Interview data from 2017 and 2022 - 2023 indicate that planning staff have been committed to expediting affordable development.

[13] The Municipal Business and Tax Regulations Code Section 26(a) provides that San Francisco's departments may "take into consideration the effects of the proposed business or calling upon surrounding property and upon its residents . . . [and to] exercise its [or their] sound discretion as to whether said permit should be granted, transferred, denied or revoked." SAN FRANCISCO, CAL., BUS. & TAX REGS. CODE § 26(a) (2019). San Francisco Planning's website states that the city interprets this part of the Municipal Code as granting the Planning Commission discretionary authority over all building permits, including permits not otherwise discretionary under zoning and planning requirements. *Discretionary Review*, S.F. PLAN., https://sfplanning.org/resource/discretionary-review (Jan. 25, 2023).

Figure 2: Comparison of Timeframes by Affordability Classification, All Years



Graphic Developed by Dori Ganetsos using CALES data.

Local policy and practices are inconsistent with the goals of the Permit Streamlining Act, Housing Accountability Act, and Housing Crisis Act.

Stakeholders report that San Francisco's local rules and politics create planning practices that are inconsistent with state housing laws which aim to quicken planning review and reduce subjectivity. Approvals data suggests these stakeholders are correct.

First, the data the city makes publicly available on project applications shows San Francisco systematically failed to meet PSA notification deadlines for discretionary approvals issued in 2018 - 2021. Planning recorded more information on application notices in its public portal for applications filed after January 1, 2018, as compared to prior years, indicating that San Francisco Planning is doing more to track and disclose project intake. Still, the city's data shows the city routinely did not meet PSA deadlines. Also, up until July 2023, local policy required the entitlement process for most dense development to begin with a mandatory Preliminary Project Assessment (PPA) process that added, on average, a year to the application process.

Second, local rules drive the city's implementation of the California Environmental Quality Act (CEQA), which extends timelines. Local rules that allow for easy administrative appeals and require appeal of CEQA determinations to follow entitlement[14] push environmental planners to make CEQA determinations at the close of the entitlement process. This practice limits the PSA's effect on overall approval timeframes.[15] Also, the state's CEQA guidelines do not require San Francisco Planning to incorporate wind and shadow studies into compliance pathways for exempt developments, but local law does. These supplemental studies add time

[14] The Board of Supervisors provides an advisory that explains that Section 31.16 of its Administrative Code requires that the Board will hear an appeal after the final approval action. *See* S.F. BD. OF SUPERVISORS, APPEAL FILING TO THE BOARD OF SUPERVISORS CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) EXEMPTION DETERMINATIONS APPEAL (Aug. 28, 2023), https://sfbos.org/sites/default/files/CEQA_Exemption_Determinations_Appeal_Info_Sheet.pdf.

[15] We interpret California Government Code § 65690(a) as imposing limits on the time to approval under the PSA only after a city makes CEQA determinations. *See* CAL. GOV'T CODE § 65690(a) (West 2023).

and cost to environmental review, and sometimes provide a basis for local administrative appeals.[16]

Third, and relatedly, administrative appeals not only delay entitlement for specific projects that face appeal, administrative appeals also influence planning practices at a systems level. Most stakeholders (across groups) perceive that San Francisco's process risks inserting the Board of Supervisors into any approval pathway through an appeal. This process nurtures risk averse planning practices at all stages which derail other local and state policy that aims to quicken review. Data also shows that appeals increase the workload for planners already juggling immense workloads, which in turn impacts the pace of review for other development proposals. For example, **an administrative appeal of just one entitlement in our dataset required 374 additional staff hours and $52,204 to prepare the appeal—even though the appeal was withdrawn**. Notably, nearly all the planners we interviewed or met with are more apprehensive of the Board of Supervisors than potential litigants.

Fourth, stakeholders report frequent continuances and multiple hearings for non-CEQA approvals, which they say also allows for changes to proposed development outside of formal hearings. San Francisco's publicly accessible data on hearing dates is incomplete for about half of our 2018 – 2021 observations. Still, we found that at least 22% of all 2018 – 2021 quasi-adjudicative entitlements had multiple continuances or hearings for a single step.[17] Some observations have remarkably high rates of continuances and hearings. One project, for example, had nine continuances for a joined Large Project Authorization and Density Bonus approval step.

Fifth, several stakeholder groups report that local policy allows frivolous and meritless challenges with ease (evidenced by withdrawn or denied appeals or withdrawn or denied requests for exceptional discretionary review)[18] and with little to no cost to project opponents, yet significant costs to planning staff and developers. Project proponents see increased costs because of the delays and uncertainty that these processes create. The processes also impact the workflow of Planning Department staff, which slows down planning review. For example, data shows that when project opponents request exceptional discretionary review, planners can expect to work several days and sometimes weeks preparing for a hearing on a project with which they already completed review. This requires shuffling work priorities. Developers report that rules that make it easy to challenge imminent planning approvals foster an opaque practice of negotiation outside of formal hearings which risks imposition of subjective conditions of approval. The approvals data show at least 14% of entitlements (across both study periods—or eight years) faced administrative appeals that were usually withdrawn or denied.[19]

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[16] We note here that San Francisco's public portal only provides access to shadow studies, although many stakeholders including planners stated that wind studies are common.

[17] This includes entitlements that only required a planning department or zoning administrator review. If we take out those entitlements that did not require a hearing in front of the Planning Commission or Board of Supervisors under planning and zoning law, the rate is at least 30%.

[18] Exceptional discretionary review refers to a local rule that allows project opponents to request the Planning Commission exercise discretionary review for an approval that did not otherwise require the Planning Commission's involvement. This request necessitates a hearing, at which time the Planning Commission then determines if it will exercise discretionary review because of exceptional and extraordinary circumstances which could lead to modifying the conditions of approval. More detail on this local process is in the full report. We refer to this as "exceptional discretionary review" hereafter.

[19] Administrative appeal data for 2018 - 2021 depends on internal tracking and self-reported data and is not systematically available on the city's public portal. It is possible that the rate of administrative appeal could be higher.

Also, at least 20% of discretionary building permits in study years received a request for exceptional discretionary review.

Subjectivity and variability persist in the post-entitlement process.

All stakeholders experienced with development in San Francisco shared that the permitting process lacks standardization or uniformity in how the process unfolds. Outcomes, in terms of processing time, are contingent on who is assigned to the development rather than on the form of the development. This variability slows, and sometimes derails, production. Stakeholders describe building permit processes as inefficient and subjective, triggering planning review again even after entitlement. There is also notable difference in the way all stakeholders describe Planning Department and Department of Building Inspection (DBI) staff. Stakeholders blame local approval bodies for overly cautious planning practices. In contrast, stakeholders complain of too little oversight or management of DBI staff, and too few performance standards, as influencing permitting practices.

Stakeholders suggest local reforms must eliminate discretionary review on some housing or the city will not meet its RHNA or resolve long-standing inequities in land use.

Importantly, planners, developers, and many housing advocates welcomed the state's intervention into local discretion through SB 35. Though planners expressed a need for more technical support from the state when state law augments local planning review, planners agreed with developers that the state ministerial process fixed planning review for most 100% affordable development and offered that a ministerial process could do the same for other housing projects.

Stakeholder groups also shared that reforms to expedite and simplify planning review while retaining discretion will fail to fix process problems in San Francisco. Statistical analysis of approvals data suggests these stakeholders are correct. Planning review of code compliant development can take years. This is true, even though our timeline calculations do not capture the frequency of developments subject to discretionary review being punted back to Planning *after* entitlement for further additional review, because San Francisco's public data portal does not allow for systematic analysis of this problem. Regression analysis suggests that reducing process steps while maintaining discretionary review is unlikely to resolve San Francisco's production challenges.[20]

Stakeholders shared that rezoning must be coupled with procedural reform that provides a local ministerial process to address production challenges *and* equity. Planners, developers, and some housing advocates perceive current reform efforts as "tinkering" with the zoning and planning code, when what they believe is needed is procedural overhaul and equitable upzoning. Stakeholders characterize San Francisco's existing regulation as reflecting historical and current power imbalances across neighborhoods. Stakeholders caution that current density and use controls that limit housing development in more affluent neighborhoods reflect existing neighborhood power over planning and political bodies. Also, the dominance of project-level adversarial politics reflects that some communities can only access power over land use by blocking development at public hearings. When affluent neighborhoods are rezoned, stakeholders caution that neighborhood power and influence over planning and

[20] Figure 8 illustrates. For a full discussion of regression analysis using the 2014 - 2021 data, see Appendix A.

political bodies will not necessarily disappear. Without a ministerial process for at least some development, stakeholders caution that rezoning will simply catalyze more project-by-project adjudication and administrative appeals as affluent communities block more equitable distribution of dense housing development through existing process tools. If what stakeholders forecast is correct—and the data suggests that they are—then existing timelines to approval likely underestimate future approval timeframes in higher opportunity neighborhoods that the city is in the process of upzoning or proposing to upzone.

Planners, developers, and advocates share that these local rules requiring reform are values-driven. These rules reflect a widespread assumption that more process supports meaningful community engagement and sharing of power over land use which, together, help address structural inequities in the built environment. Several stakeholder groups caution that these assumptions are faulty. San Francisco's process fosters project-level political fights that result in high-risk entitlement processes without altering longstanding inequities in planning standards and zoning. Planners, in particular, share that what San Francisco needed, and still needs, is deep engagement at the policy, planning, and zoning stages to hash out what zoning and planning standards should be, as well as simplified and ministerial approval for development at the project level that serves the city's housing policy goals. Planners and developers caution that as process has gotten worse in recent years, fewer developers can navigate the risk of developing in San Francisco, and this poses major challenges to San Francisco's ability to meet its production targets. During meetings with HCD, some Commissioners and Supervisors called out this local history and the problems of process in San Francisco, seemingly aligned with the perspectives of planners, affordable developers, and housing advocates. At the same time, meetings with both Commissioners and Supervisors also revealed clear disagreement within political bodies on both the source of San Francisco's housing problems and the solution. At least some Supervisors are skeptical that increasing anything other than affordable housing production could tackle the city's housing challenges. Some Commissioners and Supervisors also expressed concern about how State Density Bonus Law and SB 35 alter the urban form, even as they want more affordability. And at least some Supervisors perceived affordability to be welcome citywide, whereas planners and affordable developers say that this is not true.

Conclusion

San Francisco's planning practice and process problems spring from local law that applies discretionary review to any permit and offers repeated opportunities to challenge project approvals after an already complex and lengthy planning review process. These rules incentivize risk averse planning practices to avoid disruptions to a busy workflow and public scrutiny from political bodies. Risk averse planning practices, in turn, limit full implementation of the Permit Streamlining Act, Housing Accountability Act, Housing Crisis Act, and in some instances, State Density Bonus Law. Local rules also limit the effects of SB 35, as affordable developers face post-entitlement appeals. Still, the direct effects of state ministerial review highlight what is possible in terms of resolving San Francisco's process issues. Planners, developers, and housing advocates suggest achievement of the city's equity goals requires a local ministerial process coupled with equitable upzoning. What is also apparent, however, is that reforming zoning and entitlement will be insufficient to attain production targets. The city has major challenges with post-entitlement processes—some of which are related, again, to local rules, and some of which are related to variability and subjectivity in permitting processes, staffing, and lack of inter-agency coordination.

Introduction

In 2016, we launched the Comprehensive Assessment of Land Use Entitlements Study (CALES) at UC Berkeley. CALES explores how communities design and apply land use law to proposals to build dense housing. We used a 2015 California Legislative Analyst's Office report that identified the metro areas with the highest housing costs in the state and where demand has outpaced supply[21] to select our first group of study cities and regions. San Francisco was at the top of the list, and we began our work by studying San Francisco and four neighboring cities.[22] We eventually grew the study to include 28 jurisdictions in seven metropolitan regions across the state.

What we found was that San Francisco zoned comparatively more land for dense housing than nearly every other city we studied across the state. Indeed, San Francisco was one of only *two* cities studied that zoned more than a third of its zoned land for all income levels.[23] Zoning land for dense multi-family housing is a necessary though insufficient condition to achieving affordability and inclusion. California's fair share housing law is premised on this concept.[24]

Despite San Francisco zoning more land for dense housing than most cities studied, we found that San Francisco's local regulatory regime was comparatively prohibitive and risked exclusion. Even though the city has explicit local policy to promote inclusion and fair housing goals through inclusionary housing programs, rent stabilization, and tenant protections, our comparative analysis categorized San Francisco as "prohibitive" due to its complex procedural maze and application of laws. Among the 28 jurisdictions studied, San Francisco was unique in that it made all development discretionary. No other city we studied made all building permits (typically issued post-entitlement) discretionary; most used aesthetic regulation or design or site plan review as the blanket discretionary hook during entitlement. A few of our study cities required use permits for all multi-family housing development. But all the other approaches we found existed in the planning code and zoning regulations. No other city studied made building permits discretionary through some other area of local law.

San Francisco was also an extreme outlier in terms of timeframes to entitlement—with median timeframes of over two years, even for housing developments that met all zoning requirements and planning standards. These lengthy timeframes eclipsed the other study cities' timeframes by many months. These timelines also exceeded planner perceptions of "average" entitlement timeframes in communities nationwide. We found that only 5% of the 140 project observations in our 2014 - 2017 dataset from San Francisco achieved entitlement in 12 months or less.

We wrote that San Francisco's land use regime exemplifies how cities can zone land for dense multi-family housing and write and implement procedural rules to create delay and uncertainty of approval. Delay creates cost. Uncertainty creates risk. Increased development costs and risk influences which developers will build within a place, and what those developers will build. In that prior research, interview data and 2014 - 2017 approvals data suggested San Francisco's local regulatory regime burdened affordable development—even if the city prioritized affordable

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[21] CHAS ALAMO ET AL., LEGIS. ANALYST'S OFF., CALIFORNIA'S HIGH HOUSING COSTS: CAUSES AND CONSEQUENCES (2015), https://lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.aspx.
[22] We refer here to our Report to the California Air Resources Board in fulfillment of Contract #3900-19STC005. MOIRA O'NEILL-HUTSON ET AL., EXAMINING ENTITLEMENT IN CALIFORNIA TO INFORM POLICY AND PROCESS: ADVANCING SOCIAL EQUITY IN HOUSING DEVELOPMENT PATTERNS (2022).
[23] *Id.*
[24] *See* CAL. GOV'T CODE § 65583.2 (West 2023).

development—and likely squeezed out possibilities for middle income housing development entirely. We found that San Francisco's local law facilitated most 2014 - 2017 entitlement being sited in formerly industrial locations or neighborhoods that had multi-family zoning in place for decades. What we concluded was that San Francisco was the most sophisticated of the cities we studied in how its local law effectively blocked dense housing development through complex procedural hurdles rather than traditional density and use constraints.

California's legislature has passed nearly 100 laws relevant to housing policy since 2016[25] to spur housing production across all income levels and promote equitable housing outcomes. Many important changes target subjectivity in planning review and aim to quicken planning review, particularly for multi-family housing. There is also new law and policy to accelerate equitable housing outcomes, in terms of increased production in high opportunity locations.

More recent legislative reforms invite important questions about how well San Francisco has implemented these state housing laws intended to promote housing production, affordability, and equity. To explore these questions, we expanded and extended our Comprehensive Assessment of Land Use Entitlements Study (CALES) to better understand San Francisco's local land use regulatory regime and identify roadblocks to all multi-family housing development approvals that would yield five or more units. This report details our methods, presents findings, and discusses their implications for the California Department of Housing and Community Developments' (HCD) Policy and Practice Review.

Methods, Data, and Limitations

HCD asked:

1) At the local level, are state housing laws (including the Housing Accountability Act, Housing Crisis Act, Permit Streamlining Act, State Density Bonus Law, SB 35, and Housing Element Law) intended to promote housing production and affordability being fully implemented, and are they achieving their intended effect?
2) What are the causes of delay in San Francisco's entitlement process?
3) To what extent do discretionary review processes impact overall project timelines and the housing approvals pipeline?

Overall Research Approach

We use a spiraling mixed methods research design that joins legal research and qualitative, quantitative, and spatial analyses to understand San Francisco's local regulatory environment and answer the research questions. A spiraling research design is iterative and allows us to reexamine theoretical assumptions and methodological choices throughout the research process. This iterative research approach is sensitive to local conditions and research needs that are sometimes difficult to discover at the beginning of a research process. This approach involves producing analysis at multiple points in the study to allow for a feedback loop with both HCD and San Francisco while also informing our own theoretical assumptions about which law, policy, or planning practice factors support or obstruct housing development. This approach also means we do not rely exclusively on qualitative, quantitative, or spatial analysis to answer any

[25] *See* Ben Metcalf, Managing Dir., UC Berkeley, Terner Ctr. for Hous. Innovation, Presentation at the California Joint Oversight Hearing with Assembly Housing and Community Development Committee: Housing Production: Recent Legislative Actions and Outcomes (Feb. 28, 2023), https://shou.senate.ca.gov/node/21.

research question. We use qualitative data (interviews) to understand our quantitative and spatial analysis (using our entitlement dataset) and vice versa.

Ongoing Legal Research

We completed initial legal research into San Francisco's planning and zoning through CALES in 2016. We updated that legal research in 2018 and 2019, and then again in 2021 to understand changes to local planning review processes (for example, the elimination of the pre-application Environmental Evaluation process in 2018) and the impact of state housing laws (including changes to Density Bonus Law, Accessory Dwelling Unit Law, Senate Bill 330, SB 35, and amendments to the Housing Accountability Act), wherever changes are codified or provided for in policy documents. The legal and planning code summary informs our interview questions and guides our current data collection process. In the scope of this work, we updated our review of local law with relevant trial court and appellate court opinions.

Our Interpretation of State Law and Definition of "Full Implementation" of State Law

Answering the first research question requires us to explore whether San Francisco's policy and practices comply with state law and whether San Francisco's local policy or practices prevent specific state laws from achieving their intended effect. This requires us, first, to interpret state law and define what it means for a locality to fully implement each law for the purposes of this research. How we define "full implementation" in the research questions also informs our methods of analysis. We list our understanding of the applicability of specific state laws, their aims, and our definition of "full implementation" here.

We interpret the PSA, Housing Accountability Act, and Housing Crisis Act as applicable to *all* discretionary approvals, or entitlements, in San Francisco that do not require local legislative action. We read provisions within San Francisco's Planning Code that allow for and anticipate that the Planning Commission will issue a waiver or exception from any planning standards or zoning *without* local legislative action as adjudicative and within the purview of these state laws.

We interpret the goal of the PSA as seeking to "expedite decisions" on qualifying development projects[26] by imposing time limits on application processing and approval decisions. We also interpret the Permit Streamlining Act as imposing limits on the time to approval under the Permit Streamlining Act only after a city makes CEQA determinations.[27] If our data shows that a local policy or practice prevents the Permit Streamlining from imposing those time limits, we conclude that the local policy or practice blocks the full implementation of the PSA, even if the data does not show San Francisco violated an express provision of the PSA.

We interpret that the goal of the Housing Accountability Act is to increase housing production by limiting the ability of cities to outright deny, reduce the density of, or render infeasible a development that complies with objective development standards. We interpret the Housing Accountability Act to prohibit these actions unless a locality provides written findings that the proposed development would have an unavoidable and impossible to mitigate adverse impact on public health or safety.[28] Relatedly, we interpret the 2017 amendments to the Housing Accountability Act, found in Assembly Bill 1515, as modifying the Housing Accountability Act's "reasonable person" standard for determining compliance with land use regulations[29] in favor of

[26] CAL. GOV'T CODE § 65921 (West 2023).
[27] CAL. GOV'T CODE § 65950 (West 2023).
[28] CAL. GOV'T CODE § 65589.5 (West 2023).
[29] CAL. GOV'T CODE § 65589.5(f)(4) (West 2023).

approving qualifying development. We read the law consistent with how the First District Court of Appeal read the law.[30] We also interpret the "deemed to comply" provision of the Housing Accountability Act consistent with this same appellate court opinion.[31] We interpret this state law as requiring a city to send a project applicant timely written notice and an explanation of non-compliance if a city determines a proposed housing development is inconsistent with applicable standards.

We use descriptive statistics and interviews to explore whether San Francisco may have imposed conditions that lead to a reduced density (between application and entitlement), or subjective standards (conditions that render the development infeasible), or otherwise effectively denied a proposal to develop housing that a reasonable person would conclude is compliant with land use regulations under the Housing Accountability Act. Where our data indicates that the city may have imposed subjective standards, conditions that reduce density, or conditions that may render developments infeasible, we describe this as a failure to fully implement the Housing Accountability Act. We do *not* conclude whether San Francisco violated an express provision the Housing Accountability Act because of the limitations of our data. We gather and analyze documents that are readily available through the city's parcel information map public portal—but we cannot confirm that the city did not issue a notice of non-compliance with applicable standards *or* did not prepare findings, because the documents are not readily available on the public portal. We cannot interpret the absence of those documents on the city's public portal as meaning that those documents do not exist, ergo, San Francisco did not comply with state law.[32]

We also interpret one goal of the Housing Crisis Act of 2019, enacted in October 2019,[33] to be to curb delays associated with hearings, continuances, and meetings.[34] Where we identify entitlements with multiple hearings and more than five hearings, we describe as inconsistent with this law or that the city is not fully implementing the law. We do not determine whether the city is systematically violating the express prohibition on number of hearings, largely because of the data challenges surrounding hearings as discussed in the body of this report.

Unique Entitlement Dataset

The Comprehensive Assessment of Land Use Entitlements Study (CALES) dataset is a uniquely detailed dataset on how entitlements issued in select years navigated their approval pathway. Table 2: Entitlement Data Counts by Project and Units Across Years details observations per study year.

[30] We refer here to the opinion in Cal. Renters Legal Advoc. & Educ. Fund v. City of San Mateo, 68 Cal. App. 5th 820, 845 (2021) ("Subdivision (f)(4) is intentionally deferential to housing development.").
[31] *Id.* at 831 (a "project is deemed to comply if 'substantial evidence . . . would allow a reasonable person to conclude' that it does").
[32] We do recommend, however, that San Francisco make those documents publicly available if they exist.
[33] We refer here to the passage of Senate Bill 330, approved by the Governor on October 9, 2019. S.B. 330, 2019-2020 Leg., Reg. Sess. (Cal. 2019).
[34] CAL. GOV'T CODE § 65905.5 (West 2023).

Table 2: Entitlement Data Counts by Project and Units Across Years

	2014	2015	2016	2017	2018	2019*	2020	2021
Projects	24	23	55	38	36	42	25	41
Units	2,470	2,069	6,371	3,359	2,824	2,807	2,839	2,869

*We included one SB 35 observation without an eligibility determination date in 2019 based on the date of the building permit.

2014 - 2017 Observations

The 2014 - 2017 dataset does not include Accessory Dwelling Unit (ADU) approvals but does include litigation-related data.[35] We do not rely on San Francisco's reporting on entitlement and permitting. Rather, we build our dataset from source documents including application documents, planning staff reports, motion and resolution documents, and legal pleadings where relevant, and construct our own code book. Importantly, in addition to our typical quality control measures, San Francisco uniquely provided us an opportunity to review our 2014 - 2017 dataset with the San Francisco Planning Department's Environmental Review team in 2018 following our first working paper.

Using San Francisco's online Property Information Map system (PIM), we augmented the 2014 - 2017 entitlement data in this study by:

1) Collecting additional hearing, correspondence, and approval data on the PPA and Environmental Evaluation Application processes, where available;
2) Collecting in-depth information on the nine observations where parties applied for exceptional Discretionary Review (DR) under San Francisco's Business and Tax Code, including all available data on the requests, hearings, and the Planning Commission's actions;
3) Confirming if and how market-rate developments satisfied San Francisco's inclusionary zoning (IZ) ordinance by reviewing our data and supporting documents (there are 10 market-rate developments in our dataset where we cannot confirm how the projects satisfied the IZ requirement);
4) Supplementing our search for "determined to be complete" dates issued by the Planning Department (there are none for all 140 observations) with a second search through San Francisco's Property Information Map (PIM)[36] for correspondence regarding incomplete applications; and
5) Augmenting existing CEQA-related coding with any available data on Wind, Shadow, and Transportation Demand Management studies for each observation in the 2014 - 2017 dataset.

[35] We detail how we collected and quality checked the 2014 - 2017 entitlement data we reference in the Report to the California Air Resources Board (CARB Report). MOIRA O'NEILL-HUTSON ET AL., EXAMINING ENTITLEMENT IN CALIFORNIA TO INFORM POLICY AND PROCESS: ADVANCING SOCIAL EQUITY IN HOUSING DEVELOPMENT PATTERNS 36-43 (2022).

[36] PIM refers to San Francisco's public portal that provides comprehensive access to numerous records associated with parcels. *San Francisco Property Information Map*, S.F. PLAN., https://sfplanninggis.org/pim/ (last visited Sept. 18, 2023).

The Permit Streamlining Act provides planning departments should determine whether an application to develop housing is complete within 30 days of receipt or the application will be deemed complete.[37] We found no publicly available data that documents that San Francisco's planners made completeness determinations within 30 days of application for any entitlement of five or more units issued in 2014 - 2017. [38]

We explored the data to see if we could determine "deemed complete" dates as well. For discretionary building permit applications, we could almost always locate the Preliminary Project Assessment (PPA) applications (where applicable) but could not always find Project Applications consistently logged. The Notice of Building Permit Application, however, references the application date (though we cannot confirm the date against a source document). For other approval applications that require only one local approval—like a Conditional Use Authorization (CUA)—we can locate the PPA documents, but we can only sometimes locate applications for those discrete approvals with date stamps of application receipt by the Planning Department.

We also cannot determine from the documents on PIM when planning review began for entitlements issued in 2014 - 2017. For projects that fall under the Permit Streamlining Act, this means that it is not possible to confirm compliance with the Permit Streamlining Act even if the Planning Department staff did not make completeness determinations. For example, we found a few instances of Planning Department correspondence that lists what an application for a discretionary approval (like a CUA) is missing, and states that review has begun and that time limits do not begin until after the project proponent submits the required materials—but the letter does not provide *when* planning review began. These letters are dated many months after the application date.[39] The date of the letter suggests non-compliance with the PSA, but the language is vague. Also, although PIM links users to a portal that provides some building permit data (permit number, description, and date), there is little to no supporting documentation available.

2018 - 2021 Observations

We first modified the data collection template to account for important changes in state law and to track source documents closely. We have variables to identify the source of data that we used to determine the timeframe, approval, and hearing values. Adding data source variables allows us to code for whether we were able to identify an approval detail or event based on the original document (primary source) or an entry in San Francisco's portal (secondary or self-reported source). We also constructed new variables to explore:

- How many public hearings (including continuances) to which a project was subjected.
- The approval body required of a developer or property owner before issuing an approval.
- Changes to project characteristics (in terms of the number of units proposed, or types of units proposed) throughout the entitlement process.
- How developments that qualified for state ministerial approvals (such as SB 35) navigated the approval process.

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[37] CAL. GOV'T CODE § 65920 (West 2023).

[38] During our prior research in San Francisco, we did not request this information through a Public Records Act request. We did confirm in meetings with San Francisco personnel that at that time, Planning did not track the relevant information.

[39] For example, using one of our CUA observations to illustrate, we can find the application (with the submission date) and the Planning Department's notice that details what is missing, and that review is underway. The time lag between the two is about 10 months and does provide when planning review began.

Consistent with prior coding, we also always code for “other approvals” we could not anticipate from legal research and review of San Francisco’s local planning and zoning ordinances. In 2018 - 2021 data, examples include approvals like those requiring sidewalk legislation to allow a development to meet other code requirements. We also continuously add variables to augment the dataset to answer the research questions above.

We built our potential observation list to collect data from multiple sources. We referenced Annual Progress Report (APR) data to identify all reported entitlements or ADU or SB 35 approvals that would yield five or more new residential units if built. The APR listed duplicates. We cleaned for duplicates as we only wanted to examine unique projects in the APR. Once we had unique reported entitlements, we ran a match within our own 2014 - 2017 dataset. We ran a fuzzy-join text matching algorithm[40] between unique entitlements in the APR with our 2014 - 2017 dataset. We found six APR unique projects that overlapped with observations in our 2014 - 2017 data (which we had already cleaned and confirmed involved entitlements in those years). We do not include those in our 2018 - 2021 dataset.[41] We incorporated the remainder of APR entitlements into our data collection strategy. We then reviewed CEQA-related approvals in San Francisco's PIM portal and Planning Commission agendas using San Francisco’s public database of environmental review notices of determinations and exemptions.[42] We identified another group of observations (developments that appeared potentially approved in 2018 - 2021) to incorporate into our data collection strategy. Our 2018 - 2021 data includes 16 SB 35 observations and 17 discretionary ADUs. We provide more detail on the accuracy of APR data in Appendix C.

In all, a team of trained students collected data on 196 potential observations of entitlement/approvals issued in 2018 - 2021 after constructing a project list from the APR, cross-referencing environmental review determinations, and any other materials that listed out SB 35 project approvals. After preliminary data collection we determined 144 observations belonged in our study for analysis of entitlements and SB 35 approvals issued in 2018 - 2021. We excluded pending entitlements, entitlements outside of our study years, and Development Agreements associated with a major phased development where no phase or building had yet secured its final entitlement. We completed a full quality check of 133 of our 2018 - 2021 observations. The quality check process involved checking each coded value we recorded in the database twice against the source document or the PIM entry if no source document was available. Where there was an ambiguity or confusion about what the coded value should be, O’Neill reviewed the value and the source material to make a final coding decision.

We completed a partial quality check for 11 observations we gathered late in our data collection process, after referencing amended Annual Progress Reports, to allow for reliable summary statistics, including regression analysis, and all spatial analysis. We exclude these 11 observations from our analysis of frequency of continuances, changes in proposed density from

[40] A fuzzy join is a joining method that is used for merging two datasets that are not perfectly matched. The reason we ran a fuzzy join is that there may be differences in how an address was written in the APR and our original dataset. A fuzzy join allows us to match projects that may have similar but not identical addresses in the APR and the CALES dataset.

[41] We would have to first confirm with San Francisco Planning whether these six potential observations were new entitlements and not modifications before including them in our dataset.

[42] *Environmental Review Documents*, S.F. PLAN., https://sfplanning.org/environmental-review-documents (last visited Sept. 18, 2023).

application to approval, project intake processes, inclusionary housing program compliance pathway, and frequency of additional studies during environmental review.

Primary Source Documents

Whenever possible, we relied on primary source documents; San Francisco does not make all primary source documents readily available. For example, calculating timeframes to entitlement for discretionary observations requires tracking the earliest required application date. Prior to discontinuing the PPA requirement in July 2023, San Francisco required project proponents submit a PPA for specific types of development before submitting a project application. We have 87 observations in our 2018 - 2021 dataset that would have required a PPA application. We were able to locate the signed and dated PPA application document to determine the first application date for 48 of those observations through PIM. We sourced PPA application dates for another six observations from PPA-related correspondence (including the PPA decision document). We had to rely on PIM entries for PPA dates for 22 observations because either the application itself was not dated, or there was no PPA application in the PIM portal. San Francisco's PPA process required project proponents to submit significant information about the proposed development.

Another example relates to San Francisco Planning's policy that mandates a pre-application neighborhood notification process, and a pre-application hearing called the "Pre-Application Community Outreach Process" or "Pre-Application Meeting."[43] This pre-application process requires project proponents to send notices and copies of plans to adjacent neighbors and neighborhood organizations *before* applying to develop land for any new construction or alteration that would change an existing structure by seven vertical feet or 10 horizontal feet. San Francisco Planning compiles the list of neighborhood organizations that project proponents must notify. Though PIM makes most PPAs available, PIM rarely provides source documents that furnish detail about pre-application hearings.

Also relevant, determining compliance with the Permit Streamlining Act requires tracking whether a project proponent applied for entitlement by submitting an application package to the Planning Department. While our dataset contains initial application dates for most of our 2018 - 2021 observations, we can source these dates from primary source documents—signed and dated applications—for only 58 observations. We rely on references to application dates in Plan Check Letters sent by the Planning Department and approval documents in another 29 observations. Where we do not have a primary source document, we rely on PIM entries for application dates, which is data that a San Francisco Planning Department planner entered into the PIM system directly.

In sum, more than half (56%) of the application dates in our dataset are essentially self-reported dates from Planning—and not readily verifiable with application documents. We also highlight here that in at least four instances, the PIM entry reports an application date *after* the approval event (which is available through a primary source document). In another five instances, the PIM system reports an application date that is prior to the PPA date. We assume these are errors (an application should neither follow an entitlement nor predate a preliminary application procedure) but we report out what the data shows, nonetheless. Although these potential errors do not impact descriptive findings on time frames to approval, they do limit analysis of consistency with the PSA.

[43] *Pre-Application Meeting*, S.F. PLAN., https://sfplanning.org/resource/pre-application-meeting (July 30, 2023).

Regression Analysis

We ran several regressions to analyze existing relationships within the CALES dataset. We include all regressions, supplementary analysis, and robustness checks in a separate methods Appendix A, though the main findings are in this report. We ran regression models on 2014 - 2017 data and 2018 - 2021 data separately, and then together. We used the statsmodel Python module[44] to run all regressions in this analysis. We calculated all regression coefficients with robust standard errors (Errors of Order 3 (HC3)) in order to account for the existence of outliers and other issues within the data such as heteroskedasticity (variation in regression errors across our observations) and provide a small sample correction.[45] Note that if we did not use robust standard errors, the standard errors of our estimates would be smaller, so the standard errors and subsequent hypothesis testing are conservative.

In-Depth Interviews and Meetings and Review of Public Hearings

We have interviews from our prior research across cities from 2017. We used transcripts from six interviews conducted in 2017 with stakeholders within San Francisco (an affordable developer, market-rate developer, city employee who managed affordable development, city planner, land use attorney, and community organization advocate) in this analysis. For this research, we also completed an additional 28 in-depth interviews with 18 additional participants that did not participate in interviews in prior years or in meetings led by HCD between late-fall 2022 and May 2023. We interviewed participants from the following groups: developers (market-rate and non-profit affordable developers); private sector professionals (architects, land use lawyers, planners); government personnel (including city planning staff); and representatives from community-based organizations (including affordable housing advocates). We identified some of these interview participants as experts within San Francisco and reached out to them to participate in an interview. Other participants reached out to us to participate in interviews as well. We advised all participants that the research would be reported to HCD, but we would protect the confidentiality of each participant consistent with our research protocols. For that reason, we do not quote any individual participant and only report on themes based on what multiple participants or entire stakeholder groups shared.

We observed another 33 meetings that HCD convened for their Policy and Practice Review with approximately 146 stakeholders, including city planning personnel, Commissioners, Supervisors, market-rate developers, affordable developers, and housing organizations. Twenty of those meetings invited one participant, and five meetings invited two to three participants. These 25 HCD-led meetings with one to three participants offered in-depth conversations, much like research interviews. Most were an hour, though a few were longer or shorter. Most meetings included participants, one member of the HCD team and O'Neill. A handful of much larger meetings (with more than three participants) included more than two HCD team members

[44] Documentation for this module can be found at STATSMODELS, statsmodels.org/stable/index.html (May 5, 2023).

[45] In regression analysis, the errors are defined by the difference between the observed values of the dependent variable (in this case, project timeframes) and values predicted by the regression specification. Accurate estimation of the uncertainty of OLS-predicted values generally depends on constant errors across observations. However, in this study, we do not assume that error is constant (homoscedasticity). For instance, model error might be larger for observations with substantially longer timeframes (i.e., where projects take two to three times longer than the median timeframe). When we use robust standard errors, we no longer assume that errors are constant across all observations, which can mitigate the impacts of this regression analysis being based on observational data. Further, we are using a small sample correction to mitigate the fact that our universe of observations is relatively small and to account for the natural clustering in timeframes that occurs at each local land use approval step.

and O'Neill, along with participants. In each of these meetings, HCD informed the participants that O'Neill would be observing and listening to the conversation for research purposes and that the research would support the state's Policy and Practice Review. About half of the meetings with Commissioners and Supervisors also included a deputy city attorney in the meeting with HCD. Stakeholders discussed planning review and post-entitlement processes in-depth.

In all, we analyzed notes from interviews and meetings with representatives from six different housing advocacy groups, over 20 planning staff and more than 60 development professionals (evenly split between affordable and market-rate development). We also heard from 14 individuals split across the executive and legislative bodies within San Francisco.

Two members of the research team performed a line-by-line reading of a subset (10%) of the interview transcripts and notes from interviews and meetings[46] to identify recurrent concepts to generate a codebook in MaxQDA. We developed codes through an inductive process—a process in which we analyzed the transcript to identify codes based on themes that the speaker emphasizes. We also generated some codes for analysis using a deductive process—a process in which we analyze the notes and transcripts for content which indicates the speaker perceives that San Francisco either violated a state law *or* believes a policy or practice blocks a state law from having its intended effect. Once we had a codebook, three members of the research team coded all transcripts using the same software. We used MaxQDA software to summarize the findings by code and used the summaries to identify cross-cutting themes. This report pulled out findings where the team reached greater than 90% agreement on coded segments. We also generated stakeholder abstracts that summarized dominant themes (including internal consensus and disagreement on key topics within stakeholder groups).

Where interview participants or meeting participants directed us to specific public hearings, we also reviewed those hearings to confirm what participants shared did occur. We only inserted quotes from public hearings or relevant media reporting into this report and did not include any direct quotes from conversations between stakeholders and either HCD or O'Neill.

Document Analysis

Both interview and meeting participants, along with data collection, identified more than 41 proposed developments for a more detailed review process by our research team. We also located and analyzed documents associated with those 41 potential developments to explore in-depth what occurred during planning review.

Study and Data Limitations

Regression analysis using CALES data does not establish causal relationships. We rely on qualitative data to establish causality. Interview data is limited by the fact that all study participants volunteered. Relatedly, data from individuals and groups that agreed to participate in meetings with HCD is also limited by the fact that these participants volunteered. Voluntary participation in interviews increases selection bias and limits the generalizability of findings from interviews. We increased the number of interviews to reduce bias, but that does not allow us to generalize about San Francisco's policies or practices. Interview findings, however, can help us craft questions for quantitative analysis. Interview findings can provide important insights when

[46] Some participants asked that the interview/meeting not be recorded for transcription purposes. In those instances, O'Neill took detailed notes during the conversation, and the team joined those notes with transcripts from other interviews or meetings for qualitative analysis.

combined with regression and spatial analysis that regression and spatial analysis alone cannot yield.

The advantage of our 2014 - 2017 entitlement dataset is that it is uniquely detailed. The limitation of that dataset, however, is that our original coding structure aimed for comparative analysis across cities. This means that when we coded our 2014 - 2017 observations, we collapsed some San Francisco processes into single variables to compare processes across jurisdictions. For example, Large Project Authorizations and Downtown Project Authorizations were coded together in our master dataset as "exceptions" because that was the most analogous to similar processes in other cities. That limits our ability to explore how those two distinct processes operate when we are studying San Francisco only. To address this in coding for the 2018 - 2021 data, we created two coded datasets. The 2014 - 2017 dataset has less detail than the 2018 - 2021 dataset.

Another important limitation of our entire entitlement and SB 35 approval dataset relates to what each observation represents. Each observation reflects successful entitlements or SB 35 approvals only. That means that this universe of projects that we use for quantitative and spatial analyses represents those developments that successfully navigated the entitlement process in San Francisco. This means that the observations also represent those developments that developers likely had a high enough probability of success that they were willing to pursue entitlement in the first place. We do not have data suitable for quantitative analysis on when and how the city may have denied applications for entitlement in our dataset. That was beyond the current research scope. There is also no reliable data suitable for quantitative or spatial analyses on parcels where a property owner is unwilling to apply for entitlement.

Also, we gathered insights from stakeholders through interviews regarding what occurs during entitlement and what influences whether some buildings get built. Specifically, stakeholders suggest that smaller buildings, which those stakeholders define as 20 units or less, may get entitled but become financially difficult to build post-entitlement. The stakeholders attributed this to an entitlement process that mediates conflicts with opponents in a way that may lead to a final entitlement of a project that is not financially possible to build.[47] If entitlement processes contribute to whether a proposed development is financially feasible—and in turn whether a developer will pull building permits to build—then theoretically we might see a difference in the rate of filing for building permits for buildings that are 20 units or less as compared to larger buildings (21 units or more).

We have two challenges concerning exploring this issue with quantitative methods. The first is that augmenting the entitlement data with post-entitlement permitting data is very difficult; San Francisco's building permit data is not as accessible online or as reliable as entitlement data. Also, San Francisco's local law makes it difficult to systematically identify what counts as the permit that represents the beginning of construction activity and/or intent to build the building because San Francisco has a discretionary building permit process.

[47] Relatedly, at the time of this writing, the San Francisco Chronicle reported on a study concluding that the City's Inclusionary Housing Program is rendering some development fiscally infeasible. *See* Noah Arroyo, *Affordable-Housing Quotas Imperil New S.F. Building Projects, Study Says*, S.F. CHRON. (Jan. 22, 2023), https://www.sfchronicle.com/bayarea/article/sf-affordable-housing-projects-17727101.php.

Findings

We report findings in response to each of the questions that HCD asked, drawing on all data and methods to answer each question. Our findings sometimes rely on data from both our 2014 - 2017 and 2018 - 2021 datasets, and sometimes draw exclusively on the 2018 - 2021 dataset. We also compare four years to four years where appropriate and construct year-to-year comparisons or group years by two-year comparisons (e.g., 2014 - 2015 compared with 2018 - 2019) where appropriate.

Table 3 summarizes the total number of observations in our dataset, and the units they would yield if built, both in terms of market-rate units and affordable units. We narrowly define affordable units to refer to deed-restricted below market-rate housing units. Group housing, student housing, and single room occupancy housing are not included in any affordable housing count. Table 4 elaborates on the type of observations within our 2018 - 2021 data only.

Table 3: Summary of Total Approvals and Unit Counts Across Study Period

Study Period	Total Approvals	Total Units	Affordable Units	% Affordable Units/ All Units
2014 - 2017 Units from Entitlement of Developments of Five or More Units	140	14,269	2,168	15%
2018 - 2021 Units Approved from Approval of Developments of Five or More Units	144	11,339	3,039	27%

Table 4: 2018-2021 Approval Observations and Units by Affordability and Process

Affordability Category	Project Count	Market-rate Units	Affordable Units
100% Market-Rate Discretionary Non-ADU[1]	55	4,264	–
100% Market-Rate Discretionary ADU[2]	16	110	–
Mixed-Income Discretionary Non-ADU	52	3,473	873
Mixed-Income Discretionary ADU	1	21	3
Mixed-Income SB 35	2	4	1,659
100% Affordable Discretionary Non-ADU	4	4	210
100% Affordable SB 35	14	426	294

[1]This includes 2 Group Housing Projects and 1 Student Housing Project.

Although we elaborate on the contours of specific rules and planning practices when we discuss each finding, there are the two aspects of San Francisco's local law that dominate nearly all interviews and provide critical framing for virtually all of our findings. The first local law is one that makes all housing approvals in San Francisco discretionary. The Municipal Business and Tax Regulations Code Section 26(a) provides that San Francisco's departments may "take into consideration the effects of the proposed business or calling upon surrounding property and upon its residents . . . [and to] exercise its [or their] sound discretion as to whether said permit should be granted, transferred, denied or revoked." The city interprets this law as granting the Planning Commission discretionary authority over all building permits, including permits not otherwise discretionary under zoning and planning requirements. The Planning Commission delegates this discretionary authority to the Planning Department to review applications that meet Planning Code standards and Design Guidelines. But when disputes arise over a building permit, "concerned parties may choose to file a [request for exceptional] DR."[48] A DR effectively stops the Planning Department's approval process, sets a public hearing in front of the Planning Commission, and triggers additional planning staff analysis to prepare for the hearing.

Once a party has requested DR, unless they withdraw their request, there is always a public hearing. At the public hearing, the Planning Commission reviews materials and hears testimony and then determines whether it will "approve, disapprove or require modifications to the project."[49] The city states that the Planning Commission exercises this form of discretionary review only in exceptional circumstances when disputes between neighbors cannot be resolved through mediation.[50] The procedure, based on how it is written, indicates that the process of requesting and holding a hearing can add months to the approval timeline, even if the Planning Commission leaves the Planning Department's approval intact.

Another topic that dominated interviews is the ease with which project opponents can challenge discretionary approvals and post-entitlement permits through an administrative appeal under City Charter Section 4.106(b). The city charter provides that the Board of Appeals (an appointed political body) will hear appeals of building permits and demolition permits, unless either permit is issued after the Planning Commission authorizes a Conditional Use.[51] The Board of Supervisors hears appeals of any post-entitlement permit associated with a Conditional Use Authorization and any appeal of a CEQA decision.[52]

San Francisco's local rules prevent full implementation of the goals and aims of state housing laws.

HCD asked whether the data shows that San Francisco is fully implementing state law, including the Housing Accountability Act, Housing Crisis Act, Permit Streamlining Act, SB 35, and State Density Bonus Law. The answer, as indicated by the data, is no. Developers, planning professionals, and most housing advocacy organizations perceive local rules as

[48] *Discretionary Review*, S.F. PLAN., https://sfplanning.org/resource/discretionary-review (Jan. 25, 2023).
[49] *Discretionary Review*, S.F. PLAN., https://sfplanning.org/resource/discretionary-review (Jan. 25, 2023).
[50] The city also elaborates on its interpretation of the power this provision affords the Planning Commission in the Application Packet for Discretionary Review. *See Discretionary Review*, S.F. PLAN., https://sfplanning.org/resource/discretionary-review (Jan. 25, 2023).
[51] The city details the limitations of the Board of Appeal's jurisdiction. *About Us, Board of Appeals*, SF.GOV, https://sf.gov/departments/board-appeals/about (last visited Sept 18, 2023).
[52] Appeal of Certain CEQA Decisions, SAN FRANCISCO, CAL., ADMIN. CODE § 31.16 (2013).

blocking the full implementation of the Housing Accountability Act, Housing Crisis Act (SB 330), Permit Streamlining Act, and State Density Bonus Law. Descriptive and inferential statistical analysis of housing approvals yields findings that are consistent with these stakeholder perceptions. Stakeholders also report that SB 35 effectively expedites planning review, but does not resolve post-entitlement problems within San Francisco.

We report findings related to SB 35 and State Density Bonus Law first, and then move through findings related to steps in the entitlement and post-entitlement process.

San Francisco Planning fully implemented SB 35, but SB 35 is not a complete process fix.

SB 35 provides a state ministerial process for qualifying urban multifamily code compliant housing developments in jurisdictions that fail to meet their RHNA production targets in prior RHNA cycles. In San Francisco, SB 35 applies to qualifying housing where 50% or more of the units are affordable. A ministerial process is significant for developers and planners in San Francisco because local law renders all approvals discretionary. The state ministerial process eliminates pre-application requirements and hearings (discussed in more detail below), the opportunity for project opponents to request DR, and CEQA review. Once San Francisco Planning determines a project is eligible for SB 35, the developer proceeds directly to the Department of Building Inspection (DBI) for permitting.

SB 35 processing timeframes are fast—whereas discretionary building permits typically take years.

SB 35 cabins the eligibility review period to 90 or 180 days depending on the project size (measured by units).[53] Like many other cities, San Francisco "restarts" the review clock if there are any changes to the application.[54] The data shows San Francisco Planning diligently applied this state law. We found that planning review for developments that began as SB 35 applications take about four months but no more than eight months. Table 7 shows that, in contrast, discretionary building permits take approximately two years to entitle or complete planning review before they begin to work with the DBI. Stakeholders explain that entitlement delays increase holding costs, but approval delays may also result in being subject to higher fees, particularly when delays span over years. Timeframes for all non-ADU developments along specific approval pathways spotlight the difficulty of entitlement and the need for a local ministerial process in addition to other zoning and procedural reforms.

[53] CAL. GOV'T CODE § 65913.15(c)(1)-(2) (West 2023).
[54] Moira O'Neill & Ivy Wang, *How Can Procedural Reform Support Fair Share Housing Production? Assessing the Effects of California's Senate Bill 35,* 25 CITYSCAPE 143, 143-70 (2023).

Table 5: Entitlement Timeframe by Approval Pathway 2018-2021

Process Categorization	Min. Timeframe	**Median Timeframe**	Max. Timeframe	**Mean Timeframe**	Standard Deviation
SB 35 Only (no discretionary process prior) (N=9)	0.89	**3.42**	7.63	**4.29**	2.63
SB 35 Conversion (all began as discretionary) (N=7)[2]	15.39	**29.39**	41.39	**29.18**	10.32
Discretionary BP (N=17)	7.76	**24.20**	47.70	**24.07**	8.58
Discretionary BP with Exceptional DR request (N=4)[3]	10.32	**32.33**	55.56	**32.64**	19.76
Variance (by ZA) (N=11)	19.73	**36.00**	69.27	**41.40**	19.96
Variance (by ZA) with Exceptional DR (N=5)	10.39	**39.48**	146.69	**59.28**	52.30
Variance (by Planning Commission) and Exceptional DR (N=1)	46.68	**46.68**	46.68	**46.68**	—
DPA / LPA / SPA (N=15)	23.31	**35.67**	67.03	**38.33**	13.59
CUA Only (N=17)	18.71	**35.05**	59.34	**35.90**	12.45
CUA[4] Pplus (N=30)	17.00	**39.68**	105.40	**46.01**	21.99
PUD[5] (N=2)	7.73	**24.53**	41.33	**24.53**	23.76
Development Agreement (N=4)	32.09	**42.16**	51.52	**41.98**	7.94
Map Amendment/General Plan Amendment (N=3)	34.49	**42.08**	64.90	**47.16**	15.83

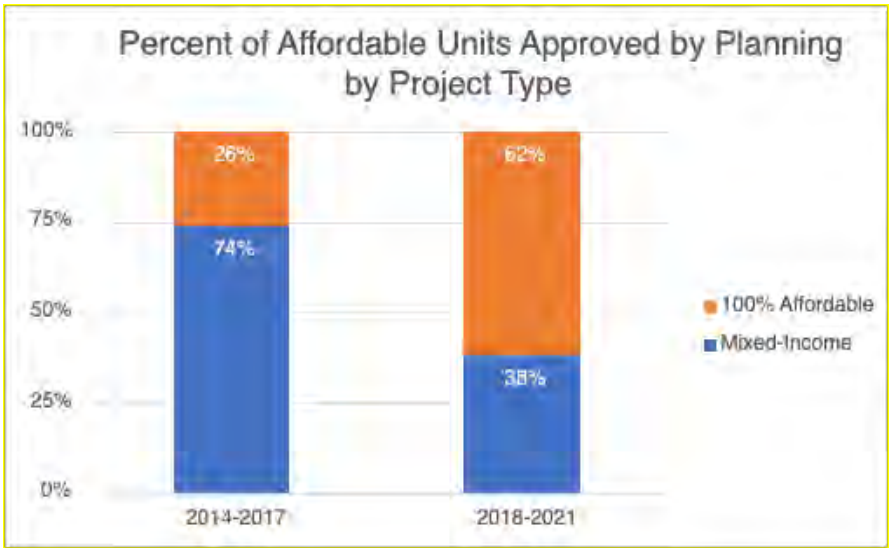
[1] We do not include two observations, discretionary building permit projects with additional administrative approvals, in this timeline calculation. One involved a discretionary building permit and an exception, and the other was a discretionary building permit with an ADU.
[2] We have one additional SB 35 project in this category that does not have an eligibility determination date. Though we know it received a building permit, we cannot include it for timeframe calculations. Each of the observations in this category proceeded through a discretionary approval process before initiating an SB 35 application. Some applications pre-date SB 35's enactment.
[3] This includes two discretionary building permits that received requests for exceptional DR and faced administrative appeals.
[4] Includes CUAs with other processes that typically go to the Zoning Administrator or Planning Commission but not the Board of Supervisors (such as CUA with a Variance, or CUA with a Certificate of Appropriateness).
[5] PUD refers to Planned Unit Development.

Developers report that SB 35 transformed planning approval pathways for affordable development.

Developers described SB 35 as eliminating risk because the law creates certainty in entitlement where none existed before. Some planners reported a steep learning curve at the outset; they shared that major changes like this to planning review are difficult to implement at first—and that early state guidance could help planning staff improve implementation. Developers, however, described San Francisco Planning's implementation of SB 35 as efficient and helpful. The data largely confirms that San Francisco Planning made most SB 35 eligibility determinations quickly and within required timeframes. The outliers represent proposals to develop affordable housing using local discretionary processes, sometimes because the project proponent filed the application before SB 35's passage and/or effective date.

Approval data also shows that state ministerial review allowed for faster processing which facilitated the approval of nearly three times the number of 100% affordable developments in 2018 - 2021 as compared to 2014 - 2017. There were only five 100% affordable developments entitled in 2014 - 2017. In 2018 - 2021 alone, San Francisco approved eighteen 100% affordable developments, and 14 of those developments used SB 35's ministerial process. Because of SB 35, most affordable units approved in 2018 - 2021 came through ministerially approved 100% affordable developments that used State Density Bonus Law. In 2014 - 2017, 74% of affordable units came from mixed income developments. In 2018 - 2021, 62% of all affordable units came from 100% affordable developments.

Figure 3: Distribution of Affordable Units by Development Type



Graphic Developed by Dori Ganetsos using CALES data.

SB 35 does not resolve post-entitlement opposition through appeals.

Affordable developers that have used SB 35 describe several post-entitlement difficulties that extend construction timelines. One difficulty affordable developers describe is that San Francisco's local rules allow project opponents to use the administrative appeals process to delay construction by challenging post-entitlement permits. (We discuss other post-entitlement difficulties below.) Construction activity impacts neighbors, who then may file complaints during the construction process.[55] But some neighborhood organizations escalate their opposition to construction by using administrative appeals to the Board of Appeals, which under local law suspends permit approvals until the appeal is resolved.[56]

2550 Irving Street exemplifies how post-entitlement challenges can delay construction of housing approved under SB 35. 2550 Irving, a 100% affordable development that would provide 90 units of supportive housing,[57] has faced at least two post-entitlement appeals of permits.[58] San Francisco Planning determined the development was SB 35 eligible on August 17, 2022. In November 2022, the Mid-Sunset Neighborhood Association appealed the demolition permit required to demolish a two-story office building because of concerns about toxins. The filing of the appeal suspended the building permit pending resolution. The Board of Appeals heard the

[55] One notable example relates to 78 Haight Street, which will house transitional-aged youth at risk of homelessness. We found three complaints from neighbors about construction logged in PIM so far. A neighborhood organization complains about inadequate notices about this development online, as well (though it characterizes the housing product incorrectly). *78 Haight*, HAYES VALLEY SAFE, https://www.hvsafe.com/78-haight/ (Mar. 17, 2022).

[56] Wherever PIM recorded an administrative appeal of a permit, we captured that in our database. San Francisco's public portal provides incomplete information about appeals and post-entitlement challenges, so we also asked interview participants to provide examples of projects that faced post-entitlement challenges. We then cross-referenced the DBI permitting system to see if we could find more information on the impact of appeals on permits.

[57] Application data indicates that at one point, this project was proposed to offer 98 units.

[58] San Francisco's public portal reports two appeals associated with the demolition permit for this development, both filed on December 5, 2022 (numbers 22-091 and 22-092). The neighborhood association also filed an appeal of the construction permit.

first appeal of the demolition permit on February 22, 2023, and denied the appeal (with a 3-2 split vote). Online records show that DBI reinstated the building permit, months after the initial approval date of October 28, 2022, on March 7, 2023. The same organization also appealed the construction site permit, originally approved on June 26, 2023. This permit was also suspended pending resolution, and on August 16, 2023, the Board of Appeals voted 2-2 on whether to grant the appeal and whether to continue the hearing. Both the appeal and the motion to continue failed as only four of five Commissioners were present. Ahead of both hearings, HCD sent Letters of Technical Assistance to the City and County of San Francisco's Board of Appeals regarding 2550 Irving, informing San Francisco that under state law, the city should not hear administrative appeals on SB 35 approvals.[59]

In related media, the neighborhood organization stated that they want more environmental remediation before construction.[60] The developer and the Mayor's Office of Housing and Community Development pointed to testing, review, and approval from public health and toxic substances agencies. The Chronicle reported that Supervisor Engardio publicly expressed support for 2550 Irving as "much needed [housing that] should not be delayed" though he also believed agencies could better communicate safety assurances to neighbors.[61] During confidential interviews, however, some stakeholders shared that they do not believe the neighborhood association is primarily concerned about environmental hazards; some stakeholders instead believe that the neighborhood opposes the development because of its size and the development's intended residents.

The agenda for the hearing on August 16, 2023, included a ~1,200-page record for this one appeal. During the hearing, Board of Appeals Commissioners disagreed about the effect of SB 35 on their power to review the permit and the appropriate scope of authority for Commissioners to exercise, generally, when deciding a matter that requires technical expertise. The Commissioner remarks during the hearing illustrate several of the ideological divides within local political bodies that stakeholders described during interviews. The public comments from Commissioners, some of which are quoted below, reveal conflicting perspectives on the normative value of state preemption of local power, the appropriate scope of administrative review of the work product from agency personnel with specific technical expertise, and the purpose and function of the Board of Appeals in general.

> Another point I wanted to make is in regard to SB 35 and SB 35 preemption. As one of the public commenters commented tonight . . . since SB 35 was passed several years ago, 2018-2019, **there has been a proliferation of new state level legislation also taking aim at local review processes**. And most have been drafted by San Francisco's own representatives in Sacramento, and those representatives in Sacramento need to know your opinions on these things **because they're doing their darndest to make sure there is no review process anymore, that the planning commission can't hear these items and they're trying to get it so that the Board of Appeals can't hear these items either, and if you believe in local review as I do as a member of this body, it's your duty and your responsibility to let your representatives**

[59] One of the letters is available online. *See* Letter from Shannan West, Hous. Accountability Unit Chief, Cal. Dep't Hous. & Cmty. Dev., to S.F. Bd. of Appeals, City & Cnty of S.F. (Feb. 22, 2022), https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/SanFrancisco-LOSTA-022223.pdf.
[60] The Chronicle reports on the challenges. *See, e.g.*, J.K. Dineen, *Judge Rules Contested Sunset District Affordable Housing Project Can Proceed*, S.F. CHRON. (Dec. 9, 2021), https://www.sfchronicle.com/sf/article/judge-rules-contested-sunset-district-affordable-16688685.php (unsuccessful attempt to secure an injunction).
[61] *Id*.

know what's at stake here and what this means to you [deep pause] I do think what's going on here goes far beyond the lot lines of 2550 Irving, and I don't necessarily think that even granting this appeal will fix the larger environmental hazards in the Sunset District . . . but I think there is a much bigger picture here in terms of the legal background and what is going on between several different agencies . . . .[62]

I see a distinct difference between that remediation and the permit here that we are here to pass judgment on. . . . We recognize that there is a problem . . . that problem is there is PEC contamination in the Central Sunset particularly around this site, and that needs to be remediated. . . . However, I see a distinct difference between that remediation and the permit we are here to pass judgment upon . . . . The appellant themselves admitted that the construction of this site has no bearing on the issues and levels that will be taking place in the neighborhood. So I see a very bright line between the contamination which needs to be remedied, and the permit that we are here to consider. . . . You know what, this is something that happens to us a lot in different circumstances, usually less dire, usually with a lot less scientific data that we have to parse our way through. When we end up with landlord-tenant issues, we find ourselves with a conflict . . . that needs to be worked out . . . . [I]t is probably best venued in the civil courts . . . but we look not to that issue, but we look to the permit and underlying issues within our jurisdiction . . . . **I see how SB 35 can be very confusing, it can be tedious, it can be difficult, but I have to ask myself do we have grounds under SB 35 to have grounds to appeal this, or overturn this permit, even if we identified it as being material to these issues that were here and I don't think this permit is material to the contamination thing, but even if we did, in this circumstance I don't see a way to get there because the objective standards under the Planning Code . . . are through the Maher ordinance**.[63] DPH has engaged the Maher procedures. They've gone one further for us as a neighborhood association has for them to do and brought in the DTSC because they have more expertise and more resources . . . and so that process that is supposed to take place is ongoing . . . . Let's be clear here, we get nervous sometimes as a board about playing amateur architect. **Right now we're playing scientists and we're playing amateur environmental scientists . . . . [L]et's realize it doesn't have anything to do with the permit in front of us today. I will not move to uphold the appeal**.

I so fundamentally disagree . . . . [P]eople on appeals boards make judgments on experts all the time . . . . And then we had people representing to us that there would be communication, same thing, they made it sound like there was going to be community participation, none occurred . . . . **I think there is an appropriate time to say that the experts got it wrong, or the process was wrong**. . . . I would ask that we continue this [to allow Board of Appeals President to join discussion].[64]

I am not comfortable telling the Sunset residents that they should feel safe, and that is what it really boils down to for me, it is a moral ethical issue for me, and I do and I can take that into account. . . . this body isn't the one that should be hearing this, unfortunately we don't have another body that is more appropriate to hear this . . . . [W]e're attorneys not environmental experts . . . . [T]his shouldn't be litigated in the context of permit appeals . . . . [B]ut we don't have an appropriate forum. . . . [**I]nstead what we have is the Board of Appeals, which for all intents and purposes has become a catch all in many ways and we have taken it upon ourselves in many instances to make consequential decisions and push for consequential**

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[62] *S.F. Bd. of Appeals: Hearing on Appeal No. 23-034* (Aug. 16, 2023) (statement of Alex Lamberg, Comm'r, Bd. of Appeals), emphasis added.

[63] Commissioner Eppler is referring here to San Francisco Health Code Article 22A that gives the San Francisco Department of Public Health oversight of characterization and mitigation of hazardous substances in soil, soil vapor, and groundwater in the Maher Area identified in the city's Building Code Article 106A.3.2.4.

[64] *S.F. Bd. of Appeals: Hearing on Appeal No. 23-034* (Aug. 16, 2023) (statement of John Trasviña, Comm'r, Bd. of Appeals), emphasis added.

> **change in city policy in city operations in city administration**. And to me this is the most consequential of any the issues we've dealt with since I've been on the board . . . this one takes the cake. There are people's lives at risk here. **And I don't think we should be the body who is imbued with this power, but ultimately our state legislators have ripped away the other layers of review so it can't go to the Planning Commission. It can't go to other commissions. It's here, and we ultimately have de novo review of this, potentially with SB 35 limitations, but you know . . . ultimately legal advice is just that – it's legal advice and we as Commissioners get to make the say.** I obviously don't think we have the votes to grant the appeal here tonight . . . but you know, if there was a time to make a leap of faith, this was the time.[65]

More developments relied on State Density Bonus Law as compared with prior years, but stakeholders disagree about how easy it is to use the state law.

State Density Bonus law allows for developers building residential or mixed-use projects with five or more units to build more housing units than zoning would otherwise allow in exchange for a prescribed number of below-market-rate units. The law provides bonuses in the form of additional density and waivers of some local standards. State Density Bonus Law is a state mandate and the state law may preempt local implementation programs with a bias towards "producing the maximum number of total housing units" under § 65915(r) of the Government Code. The law prohibits cities from applying development standards to a density bonus project that would make it impossible to build at the densities or with the concessions or incentives provided in State Density Bonus Law.[66] San Francisco's Planning Code Section 206 implements State Density Bonus Law and provides two local density bonus programs, the HOME-SF program[67] and the 100% Affordable Housing Bonus Program.[68]

We found that nearly all SB 35-approved developments also relied on State Density Bonus Law. State ministerial review through SB 35 and State Density Bonus Law allowed for ministerially approved 100% affordable developments that were, on average, larger (measured in units) than 100% affordable developments requiring discretionary review. The median project size (measured by units) of all SB 35 developments is 121 units. The mean is 119 units. The median project size (measured by units) of all 100% affordable non-ADU discretionary observations is 13 units. The mean is 53 units. For comparative purposes, the median project size (measured by units) of 100% affordable developments entitled in 2014 - 2017 was 134 units, and the mean was 113 units. The median project size (measured by units) of all non-ADU discretionary observations is 24 units and the mean is 799 units. The two largest developments that exceeded 800 units if built—among the outliers—required discretionary approval.

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[65] *S.F. Bd. of Appeals: Hearing on Appeal No. 23-034* (Aug. 16, 2023) (statement of Alex Lamberg, Comm'r, Bd. of Appeals), emphasis added.
[66] CAL. GOV'T CODE § 65915(e)(1) (West 2023).
[67] Housing Opportunities Mean Equity – San Francisco Program (HOME-SF), SAN FRANCISCO, CAL., PLAN. CODE § 206.3 (2019).
[68] The 100 Percent Affordable Housing Bonus Program, SAN FRANCISCO, CAL., PLAN. CODE § 206.4 (2018); *see also Affordable Housing Bonus Program (AHBP)*, S.F. PLAN., https://sfplanning.org/ahbp#:~:text=State%20Density%20Bonus%20Law,-In%201979%2C%20the&text=Ten%20percent%20of%20total%20housing,age%20requirements%20for%20older%20persons (last visited Sept. 18, 2023).

Table 6: Median Project Size by Product Type and Approval Pathway

Type	Median Project Size Units	Mean Project Size Units (rounded)	Standard Deviation Project Size Units (rounded)
100% Market-Rate, Discretionary Non-ADU[1] (N=55)	9	78	193
100% Market-Rate, Discretionary ADU (N=16)	6	7	3
Mixed-Income, Discretionary Non-ADU (N=52)	47	84	104
Mixed-Income, Discretionary ADU (N=1)	24	24	—
Mixed-Income, SB 35 (N=2)	**360**	**360**	**127**
100% Affordable, Discretionary Non-ADU (N=4)	13	53	83
100% Affordable, SB 35 (N=14)	**121**	**119**	**59**

[1] This grouping includes two Group Housing Projects and one Student Housing Project.

Thirty-one developments in our 2018 - 2021 dataset used State Density Bonus Law to increase the number of allowable units, and another six developments used the local HOME-SF program (all entitled in 2021). We see a notable increase in projects using density bonus programs in 2021, overall. In total, developments that secured approvals in 2018-2021 relied on density bonus programs more often than the developments entitled in 2014-2017 as well. Only four developments entitled in 2014 - 2017 used any density bonus program.

Also important is that developers used State Density Bonus Law more often than the HOME-SF program. Fifteen SB 35 ministerially approved developments in our 2018 - 2021 dataset all used State Density Bonus Law. The remaining developments that used State Density Bonus Law were discretionary mixed-income developments. At least 13 of the mixed-income developments used State Density Bonus to help meet requirements under the local Inclusionary Housing Program requirements. Five mixed income developments used Home-SF to meet requirements under the local Inclusionary Housing Program requirements as well.

There was no consensus among developers about how easily developers could use State Density Bonus Law in San Francisco.

Some developers expressed that the waivers both help create an appealing and efficient development and increase the likelihood of entitlement, overall. Some developers shared that the city's local rules and guidelines do not apply state law correctly[69] and/or that the city steered them away from using State Density Bonus Law. Developers also reported that the city applies the law so as to increase inclusionary program fee requirements once development size increases. Planners shared that design review can interfere with application of State Density Bonus Law, as political bodies may request reduced heights or removal of floors to projects that qualify for density bonuses. Affordable developers shared their frustrations concerning how planners have to do substantial work to apply different density bonus programs to help 100% affordable housing developments benefit from SB 35 while also securing required waivers. Planners also commented that State Density Bonus Law is complex, and that they (planners) would really benefit from more state guidance on its application. But planners and affordable developers emphasized that ministerial review and State Density Bonus Law were, together, critical to creating opportunities for more affordable housing within San Francisco.

Both developers and planners shared that State Density Bonus Law has been critical to helping developers manage requirements under local rules.

Developers shared that State Density Bonus Law was critical to make development financially feasible. Planners also shared that developers use State Density Bonus Law to facilitate large projects that the Planning Commission might otherwise deny. Planners explained that the city's Large Project Authorization (LPA)—theoretically meant to allow for larger projects and for modifications and waivers—does easily support larger development. Planners perceive that when developers use the modifications and waivers under the LPA, the Planning Commission interprets the project as no longer compliant and covered by the Housing Accountability Act, allowing political bodies to deny approval. Planners report that developers therefore use State Density Bonus Law to make large projects work while also staying covered by the Housing Accountability Act.

One development, outside of our study years, that stakeholders discussed during interviews as illustrative of this issue was **1010 Mission Street**. Planners reported that the developer first sought an LPA for a group housing development which the Planning Commission did not like and denied. The developer then used State Density Bonus Law to get an approval. Cross referencing documents, we found that the developer requested an LPA that was later withdrawn. The developer secured a final entitlement with an Individually Requested State Density Bonus approval and Downtown Project Authorization.

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[69] Section 206.6 of San Francisco's Planning Code may require revision after the passage of AB 1763, which provides an 80% density bonus, four incentives or concessions, and special parking ratios for 100% affordable housing projects, and AB 2345, which increased the maximum range of the density bonus to 50% for housing projects with 15% very low-income units, 24% lower income units, or 44% moderate income units. *See* CAL. GOV'T CODE §§ 65915(f)(1), (f)(2), (f)(4). AB 2345 also lowers the required percentage of lower income units required to obtain multiple incentives and concessions under § 65915(d)(2). Table 206.6B seems inconsistent with those provisions under state law. San Francisco Planning, however, also issues Bulletins explaining how it applies state law. *See, e.g.,* S.F. PLAN., BULL. NO. 6, IMPLEMENTING THE STATE DENSITY BONUS PROGRAM (Feb. 2023), https://sfplanning.org/sites/default/files/documents/publications/DB_06_Implementing_State_Density.pdf.

Planners also stated that State Density Bonus law is critical to promoting productive dialogue about how to make proposed developments better, because once it becomes clear that the city cannot deny the project (and only after it is clear the city cannot deny the project), the public discourse shifts towards how to improve the design to be sensitive to neighborhood needs. Participants offered **321 Florida Street**, a mixed-used mixed-income development entitled in 2021 that required an LPA but also used State Density Bonus Law, as an example of a how state law helped secure entitlement rather than a project denial. After it was clear the city could not deny the development, planners also reported that the conversation with the community focused on how to improve the design in a manner that did, in fact, improve the aesthetics of the proposed development. Another example participants provided was **1560 Folsom Street**, another large mixed-use mixed-income development entitled in 2021 that required an LPA but also used State Density Bonus Law. The outcome for 1560 Folsom allowed for special sidewalk placards to celebrate the area's local history.

Planners note, however, that State Density Bonus Law, while critical to increasing certainty of entitlement for larger developments, may not produce more efficient and speedy deliberative processes during entitlement. Consistent with this perception, our data shows that the only approvals under State Density Bonus Law that planning department staff issued were those approvals associated with SB 35 projects. All other requests for density bonuses for discretionary projects required approval from San Francisco's Planning Commission. Relatedly, we found some observations with multiple continuances for hearings for joint LPA and State Density Bonus Law approvals, as well.

Our data also shows that while an LPA coupled with a State Density Bonus Law approval may secure approval from the Planning Commission, the approval is still vulnerable to being overturned by the Board of Supervisors if the community perceives the final entitlement outcome to be contrary to neighborhood needs. **2300 Harrison Street** illustrates this issue. This proposed mixed-use building would have added three stories to an existing three-story commercial building and demolished an adjacent parking lot. The development would add ~27,000 square feet of office and retail space on a site occupied by Lyft, along with 24 units of housing, of which three would be deed-restricted affordable. After the Planning Commission approved the development, community organizations appealed the Community Plan Exception under CEQA to the Board of Supervisors. The Board of Supervisors unanimously upheld the appeal. A community group publicly stated that the entitled development represented an exploitation of State Density Bonus Law.[70]

[70] Media reported that the new development would result in ~95,000 square feet of retail/commercial space. We reviewed the project proposal documents, and those documents indicate the proposed development would *add* approximately ~27,000 square feet of commercial space, and 24 units of housing, *to an existing* building that had ~68,000 square feet of office space. *See* Laura Waxmann, *S.F. Supervisors Take United Stance Against Mission Development at Former Lyft Offices*, S.F. BUS. TIMES (Aug 19, 2020), https://www.bizjournals.com/sanfrancisco/news/2020/08/19/sf-supervisors-vote-down-mission-district-office.html.

Table 7: Frequency of Use of Density Bonus (All Programs)[1]

Year (N=Total Approvals/Per Year)	N Density Bonus Used		N State Density Bonus used
2014 (N=24)	0		-
2015 (N=23)	0		-
2016 (N=55)	1		Unknown
2017 (N=38)	3		Unknown
2018 (N=33)	SB 35: 3	Other: 3	5
2019 (N=34)	SB 35: 3	Other: 2	5
2020 (N=25)	SB 35: 5	Other: 2	7
2021 (N=41)	SB 35: 4	Other: 15	16

[1]We do not calculate which density bonus programs (state or local) 2014 - 2017 entitlements used.

Stakeholders also do not agree on whether State Density Bonus Law is good for San Francisco. Market-rate developers shared that State Density Bonus Law has been critical to increasing the feasibility of housing development while also satisfying the local inclusionary program as on-site requirements increased over time.[71] Affordable developers heavily relied on State Density Bonus Law to increase the size of 100% affordable development, which did increase the number of units approved. Some Commissioners and Supervisors also described density bonuses as critical to reaching affordable housing targets.

But some Commissioners and Supervisors expressed concern about how the city's application of State Density Bonus Law might derail community outreach or historic preservation. Some planners shared that implementing State Density Bonus Law was difficult at times and required educating political bodies on where San Francisco retained discretion and where it did not under the law (which was further complicated by San Francisco's context of all permitting being discretionary). Planners also perceived that local political bodies did not like the impact of State

[71] Section 415.3 details the thresholds. Qualifying applications initiated before January 12, 2016, had a 14.5% on-site inclusionary requirement; applications initiated after that date had variable thresholds depending on the project size and a complex scheme of alternatives. Under Section 415.6(a)(1), a development larger than 10 units but smaller than 25 that elected on-site units would have to meet a 12% threshold. Section 415.6 (a)(2) and (a)(3) provided that owner occupied developments of 25 units or more would have to meet a 20% threshold, and rentals developments larger than 25 units would have to meet a 18% threshold. Section Section 415.6(a)(5) also provided for incremental increases beginning in 2018, which would raise the thresholds even higher for developments of 10 – 24 units to 15% and larger developments would increase incrementally each year, but not to exceed 26% for owner occupied developments and 24% for rental developments. SAN FRANCISCO, CAL., PLAN. CODE §§ 415.3, 415.6 (2021).

Density Bonus Law on urban form because it limited subjectivity in design review, or its impact on inclusionary outcomes in terms of the overall yield of on-site affordable units.[72] Consistent with these planner perceptions, some Commissioners and Supervisors did express concern about state law that overrides design considerations.

Local rules complicate application of the Housing Accountability Act.

When discussing the importance of SB 35 and State Density Bonus Law, another important theme emerged. Several stakeholder groups reported that local political bodies do not consistently follow the Housing Accountability Act and deny proposed development covered under state law. Importantly, stakeholders did not describe the Planning Commission as blatantly violating state law but explained that instead, complex local rules make it difficult to determine which local approvals are within the purview of the Housing Accountability Act and which are not. If there is any ambiguity about whether the Housing Accountability Act applies, and a proposed development is at all controversial, that ambiguity leads to a project denial.

Planners emphasized here again the importance of state guidance on how the law changes local processes. When state law does not create a ministerial process (like SB 35) but limits local discretion, state guidance provides clear communication to political bodies and the public how the state law changes local processes. That is critical, planners say, in a local context like San Francisco where at least some within the political bodies and communities interpret local rules as allowing the city to retain the power to deny an approval. If state law significantly limits the right to deny an approval, planners recommend that the state guidance be clear so as to enable staff and Commissioners to say publicly that state law dictates a particular outcome.[73]

Local rules require entitlement processes begin before the application—and navigate multiple hurdles along the way to approval.

Prior to July 1, 2023, the process for entitlement for many multifamily non-ADU and non-SB 35 developments began with a required Preliminary Project Assessment (PPA).[74] The Mayor's Office recently eliminated this hurdle through an Executive Directive, but we explain how this impacted the observations within our dataset.

Under the PPA process, a project proponent was required to complete the PPA before they could submit their project application. San Francisco's PPA process required project proponents to submit significant information about the proposed development. We have 87 observations in our dataset that would have required a PPA application under that local policy. We can verify PPA application dates against source documents for more than half of those, but otherwise rely

[72] Commissioner Diamond on June 1, 2023, expressed concern about the impact of State Density Bonus Law on urban form when questioning whether Supervisor Melgar's proposed legislation to increase density in a west side neighborhood would, in conjunction with State Density Bonus Law, lead to nine-story buildings.

[73] It is important to note, however, that during this research, HCD sent two advisory letters to the city on the impact of SB 35 on post-entitlement administrative appeals, and the limitations that SB 35 placed on San Francisco's ability to hear post-entitlement appeals in the context of an SB 35 approval. San Francisco's Board of Appeals heard both post-entitlement administrative appeals, even though at least one of these letters explicitly stated that SB 35 did not allow for post-entitlement appeals.

[74] San Francisco Planning now provides that it no longer accepts PPAs consistent with the Mayor's Executive Directive issued on February 7, 2023, subsection II.9. OFF. OF THE MAYOR, CITY & CNTY. OF S.F., DIRECTIVE 23-01, HOUSING FOR ALL (Feb. 7, 2023), https://sf.gov/sites/default/files/2023-02/Executive%20Directive%2023-01_Housing%20for%20All.pdf.

on self-reported dates from San Francisco's system. The average time from PPA application to project application was about a year.

Table 8: PPA to Application Timeframes

(months)	Median	Mean	Standard Deviation
PPA to Earliest Application Date	4.96	11.71	21.00

San Francisco Planning, responding to direction from the Mayor's Office, eliminated the PPA process. Still, San Francisco Planning policy mandates a neighborhood notification process before a project proponent files an application, and a pre-application hearing called the "Pre-Application Community Outreach Process" or "Pre-Application Meeting."[75] This pre-application process requires project proponents to send notices and copies of plans to adjacent neighbors and neighborhood organizations *before* applying to develop land for any new construction or alteration that would change an existing structure by 7 vertical feet or 10 horizontal feet. San Francisco Planning compiles the list of neighborhood organizations that project proponents must notify. However, San Francisco Planning does not consistently track pre-application meetings in its public portal.

Stakeholders have differing perspectives on the value of this pre-application meeting process. Some Commissioners and Supervisors referred to the pre-application process as important community outreach. Other stakeholders perceive it as a requirement that assumes conflict exists before a developer has even proposed a development.

Application intake processes were inconsistent with the PSA but improved marginally over time.

The Permit Streamlining Act (PSA) requires cities to provide information to applicants about city requirements for applications to develop housing and sets limits on how long a city can take to determine an application is complete and begin planning review. This state law applies to all discretionary development projects that are quasi-adjudicatory actions (like a variance or conditional use requirement). The PSA also limits the amount of time a city can take to process an application, but the clock begins to run after Planning prepares environmental review documents.

We collected information on application dates, and any notices regarding the status of applications and the dates of those notices, when available on PIM, for 135 discretionary, non-ADU entitlements that we believe did not require a legislative act or development agreement for approval. This list includes more observations than we analyze—or it includes observations we collected some data on that we did not include in our timeline analysis because they were not yet entitled, or they were entitled in 2022 or 2023 .

Of these 135 observations, we found notifications sent to project proponents about their entitlement's application status (inclusive of notices about the incompleteness of their applications) for 75 observations(~56%). Of those 75 observations, we were able to determine

[75] *Pre-Application Meeting*, S.F. PLAN., https://sfplanning.org/resource/pre-application-meeting (July 30, 2023).

an application date and notice of status date for 72 observations. Of those 72 observations, 56 notifications (~78%) were outside of the required 30-day period. Of the 56 (out of 72 observations) that are in our dataset for analysis (observations entitled from 2018 - 2021), 41 notifications (~73%) were outside of the required 30-day period.

This does not mean that San Francisco Planning complied with the PSA in the other 60 instances, only that there is insufficient data to determine compliance or non-compliance with the PSA in half the observations.

We also looked at whether San Francisco Planning improved its project intake and notification processes over time. We have a confirmed application date for 130 out of 135 observations. In all five observations where we could not confirm an application date, we could also not confirm a notice of status date. Of these 130 observations, 65 observations have a confirmed application date after 1/1/2018, and 65 observations have a confirmed application date before 1/1/2018.

Of the 65 observations that have a confirmed application date after 1/1/2018, we found San Francisco Planning sent notifications to project proponents about their entitlement's application status (inclusive of notices about the incompleteness of their applications) for 53 observations (~82%). Of these 53 observations, 37 notifications are dated after the required 30-day period (70%). Of the 65 observations that have a confirmed application date before 1/1/2018, we found notifications sent to project proponents about their entitlement's application status (inclusive of notices about the incompleteness of their applications) for 19 observations (~29%). Of these 19 observations, 19 notifications are dated after the required 30-day period (100%). This suggests that San Francisco improved its application intake and notification process, but only marginally. What is also clear is San Francisco Planning is doing a better job to track the data, which can facilitate internal monitoring of this issue and continued improvement.

Table 9: Analysis of Application Status Notifications

	Application Date Before 1/1/2018 (N=65)	Application Date After 1/1/2018 (N= 65)
Percentage of observations where notice of application status is available	29% (N=19)	82% (N=53)
Percentage of observations where notice, if available, is outside of the required 30-day period	100% (N=19)	70% (N=37)

Planning policy relies on exemptions to comply with CEQA, but local rules require additional studies.

State law provides that if a development approval is discretionary, CEQA applies. With a few exceptions, local law determines whether CEQA applies to classes of housing development by making those housing approvals discretionary. State law, however, allows cities to quicken environmental review for some development. There are statutory exemptions in the California Public Resources Code, and the state's CEQA Guidelines provide for another thirty-three categorical exemptions. For example, a planning department can use the Class 32 infill exemption for an urban infill project to bypass CEQA review if the project satisfies certain conditions. The department must still prepare documentation. But the process is comparatively

faster than more intensive environmental review processes, like an Environmental Impact Report (EIR), within most jurisdictions in the state.

When a project is not categorically exempt, the planning agency conducts an initial study to assess whether there is substantial evidence that the project will have a significant effect on the environment. If it is not clear that the impacts can be mitigated below a significance threshold, a planning agency must prepare an EIR. If there is not substantial evidence of a potentially significant effect on the environment, the agency issues a Negative Declaration (ND). If there is substantial evidence that a project will significantly impact the environment, but the developer can properly mitigate the effects, then the agency issues a Mitigated Negative Declaration (MND).

California law also allows the planning agency to reuse existing EIRs to facilitate "streamlining" some classes of development through the environmental review process. This is called "tiering." Tiering allows the proposed development to satisfy CEQA's requirements by relying on existing EIRs, typically programmatic EIRs associated with a plan, and narrowing the environmental review documents to only those issues that have not been evaluated in a prior EIR that covers the proposed project. Tiering requires a prior environmental review document (generally an EIR) typically connected to a prior large-scale planning approval (usually a General Plan or Specific Plan); however, the source of the document varies. A Community Plan Exemption (CPE), for example, is a tiering-based exemption available to projects consistent with a community plan, General Plan, or zoning. When proposed development satisfies environmental review through tiering, it should theoretically reduce project-level costs for the developer because cities generally pay the costs of the relevant plan- or program-level EIR.[76]

EIRs are uncommon in San Francisco. Most developments benefit from streamlining. San Francisco is like its neighbors in this way, though San Francisco's timeframes are quite different from other neighboring jurisdictions we have studied. One notable change between 2014 - 2017 and 2018 - 2021 is that there are more categorical exemptions in the latter four years. That highlights that San Francisco Planning made a change in planning practice that simplifies and lightens the burden of environmental review for qualifying development—and yet overall, entitlements timelines increased in 2018 - 2021.

[76] Robert Olshansky, *The California Environmental Quality Act and Local Planning*, 62 J. AM. PLAN. ASS'N 313, 319–20 (1996).

Table 10: CEQA Compliance Pathways

Year Entitled and N	Categorical Exemption	Tiering (CPE)	Addendum	MND/ND	EIR	Multiple Pathway	CEQA Unknown*
2014 (N=24)	4%	79%	4%	0%	12%	0%	0%
2015 (N=23)	4%	56%	4%	15%	15%	7%	0%
2016 (N=55)	16%	67%	0%	11%	5%	0%	0%
2017 (N=38)	3%	82%	0%	3%	11%	0%	3%
2018 (N=31)	29%	45%	3%	13%	3%	3%	3%
2019 (N=29)	48%	38%	0%	10%	0%	0%	3%
2020 (N=18)	44%	17%	6%	17%	17%	0%	0%
2021 (N=33)	52%	33%	0%	9%	6%	0%	0%

Although San Francisco uses exemptions and tiering to comply with CEQA, local rules, not state CEQA guidelines, also require developers complete additional studies. Developers and planners in interviews and meetings indicated that local law demands that planning require wind and shadow studies. We collected information on whether San Francisco Planning required additional studies for 100 discretionary, non-ADU observations. We found no information about wind studies in San Francisco's public portal, which is noteworthy because wind studies came up frequently in interviews. Also, we note here that Class 32 infill exemptions require Transportation Demand Management studies.

Out of the 44 observations that satisfied CEQA through a Categorical Exemption, 22 (50%) required additional studies.

- ~18% (N=8) of all observations that benefited from a Categorical Exemption (N=44) also required a Shadow study.
- ~43% (N=19) of all observations that benefited from a Categorical Exemption (N=44) required a Transportation Demand Management study.
- ~11% (N=5) of all observations that used a Categorical Exemption (N=44) required both Shadow and Transportation Demand Management studies.

Out of the 33 observations that satisfy CEQA through a Community Plan Exemption, 24 (72%) required additional studies.

- ~32% (N=11) of all observations that used CPE (N=33) also required a Shadow study.
- ~70% (N=23) of observations that used a CPE (N=33) also required a Transportation Demand Management study.

- ~30% (N=10) of all observations that used a CPE (N=33) required both Shadow and Transportation Demand Management studies.

One observation (out of two) that complied with CEQA through a CEQA Addendum required a Transportation Demand Management study. Neither project required a Shadow Study.

Out of the 12 observations that required a Negative Declaration or Mitigated Negative Declaration, 10 (83%) required additional studies.

- ~33% (N=4) of all observations that required a ND or MND (N=12) required a Shadow Study.
- ~67% (N=8) of all observations that required a ND or MND (N=12) required a Transportation Demand Management study.
- ~17% (N=2) of all observations that used an ND/MND (N=12) to satisfy CEQA required both Shadow and Transportation Demand Management studies.

Out of the six observations that required an Environmental Impact Report, 3 (50%) also required a Shadow Study.

Risk of costly local appeals drives cautious environmental planning practices that limit the impact of the PSA.

In theory, using streamlined environmental review should quicken the planning review process. The PSA sets sixty-day time limits on approving development proposals that qualify for CEQA exemptions and streamlining, once the city makes a determination that the development is exempt from environmental review.[77] But in San Francisco, that is not necessarily true. One possible explanation might be that if environmental determinations always follow other entitlement approvals, using a streamlined environmental review process may have little impact on overall timelines if the other approval steps require more time (though a streamlined process should still reduce costs associated with more intensive environmental planning review).

After reviewing pre-application requirements and notification practices, we explored the data to understand when San Francisco Planning began environmental review and made CEQA determinations. We were able to isolate the environmental review determination or approval date in 95 of our discretionary non-ADU observations. Figures 4 and 5 illustrate what we found: that environmental review determinations almost always happen close to or at the same time as final entitlement decisions under local land use regulation. In 20 of those observations, the environmental determination and approval date is also the latest approval. For the remaining observations in this group, environmental determinations or approvals are often close to the final entitlement date. For 21 (out of 95) observations, the environmental approval date is at most seven days before the final approval date. For 36 (out of 95) observations, the environmental approval date is at most 30 days before the final approval date. For 48 (out of 95) observations, the environmental approval date is at most 60 days before the final approval date. This is important because of the limitations on entitlement review timeframes that the PSA imposes but, as noted, the clock begins to run after Planning prepares environmental review documents, not before. Because environmental determinations occur so close to the end of the entitlement period, the PSA seems to have little effect on overall entitlement timeframes.

[77] CAL. GOV'T CODE § 65950 (West 2023).

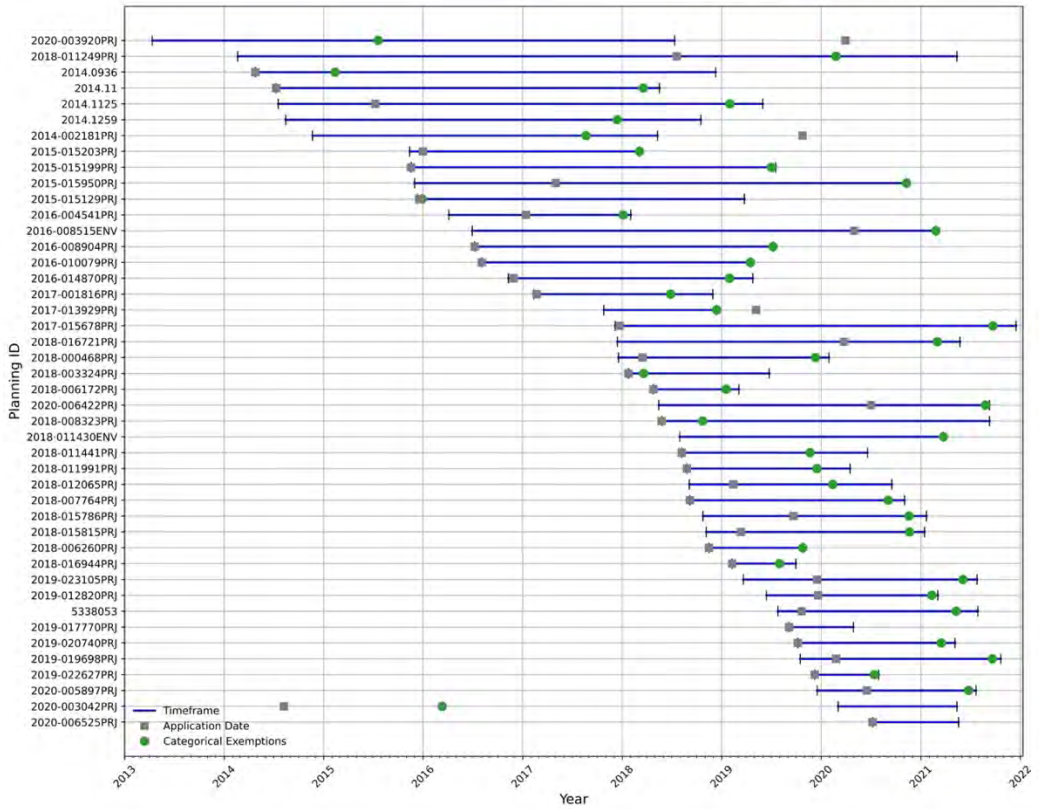

Figure 4: CEQA Milestone Timelines Categorical Exemptions Only (2018 - 2021)

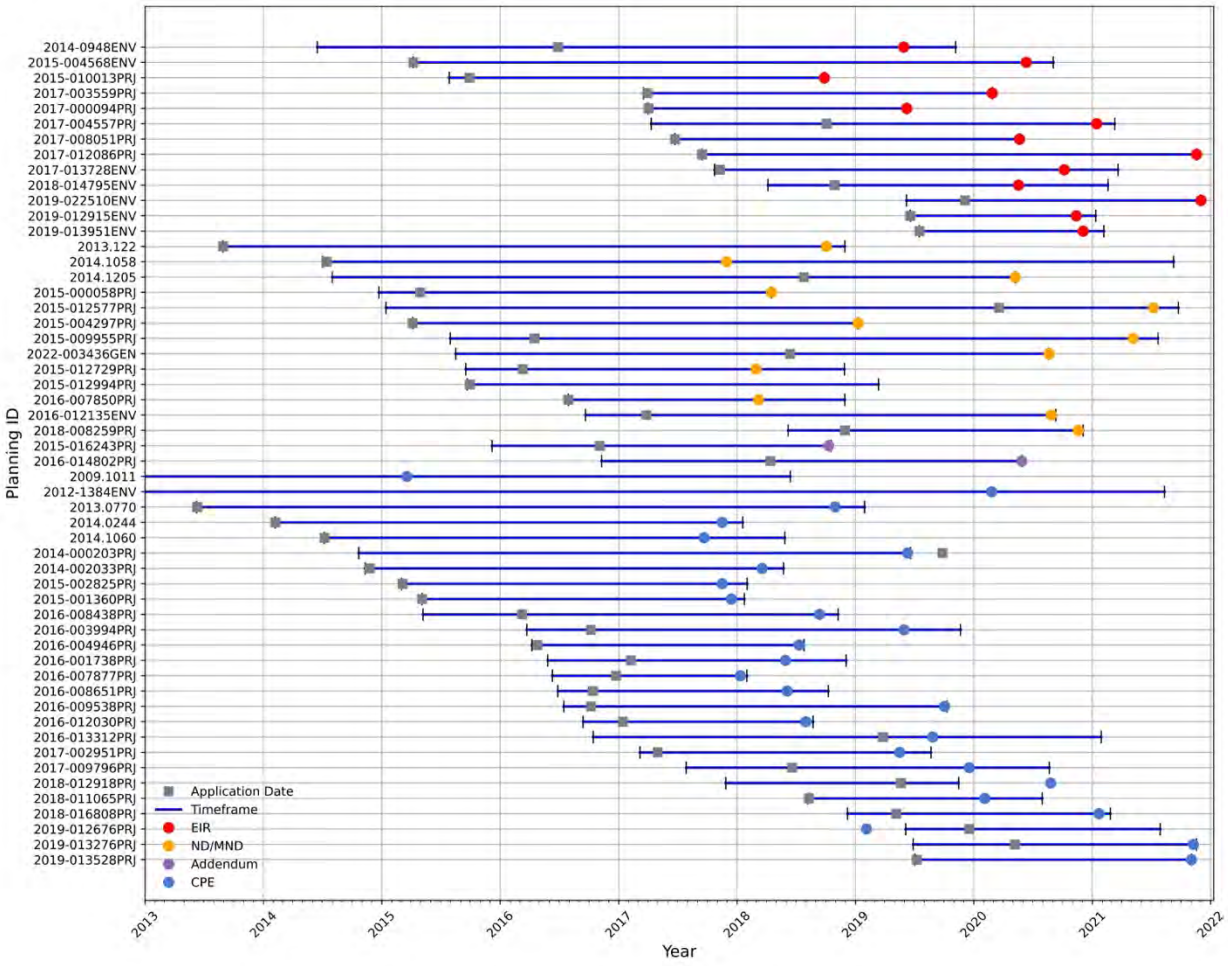

Figure 5: CEQA Milestone Timelines Multiple Pathways (2018 - 2021)

Commissioners, planners, and developers all agreed that CEQA slows approvals, and all—including planners and Commissioners—expressed concerns about CEQA abuse. During interviews and meetings with these stakeholders, we asked why environmental review takes as long as it does, as most development in San Francisco is categorically exempt from environmental review or benefits from a streamlined CEQA process. Developers believe San Francisco Planning is too slow to assign environmental planners to projects. Commissioners believe planners are overly cautious because they fear judicial scrutiny. In contrast, planners from multiple departments shared that there are two features of local rules that extend environmental review: (1) local rules requiring further studies add more work, and (2) administrative appeals, or the risk of administrative appeals, to the Board of Supervisors[78] steers planning practice and influences how long review takes overall.

On the second point, planners elaborated that because it is easy to appeal planning approvals, the risk of appeal influences planning practices. For environmental review, both Commissioners and planners perceive that there is a high risk that project opponents will challenge projects by

[78] State law governs much of the requirements for administrative appeals of CEQA determinations (*see* CAL. PUB. RES. CODE § 21151(c) (West 2023); CAL. CODE REGS. tit. 14, § 15025(b) (West 2023)) but local rules require that the filing deadline for an administrative appeal of a CEQA determination begins to run only after final entitlement decisions under local land use regulation.

challenging environmental determinations. What is most striking about the difference between Commissioner and planner perspectives is that Commissioners believe planners are worried about judges, but planners expressed confidence that their work would survive judicial scrutiny. Instead, planners expressed concerns regarding the Board of Supervisors.

Planners shared that even if most administrative appeals are withdrawn or denied, the beginning of an appeal creates more work for planning staff members managing environmental review. That additional work changes the pace of all environmental planning reviews for all projects because the projects that face an administrative appeal change review priorities. Also important, the experience of the administrative appeal for planners during the administrative appeal hearing influences their approach to work, overall. The risk of an appeal makes planners more conservative and risk-adverse in their work. One notable trend in interviews and meetings with planners was that planners appeared much more apprehensive of the Board of Supervisors than potential litigants. One planner also stated that, when elected, political bodies are highly critical of planning staff work within a public hearing. This can be demoralizing and impacts the department's working culture.

We reviewed our data across 2014 - 2021 to determine the rate of administrative appeal (inclusive of CEQA-related appeals and other appeals). At least 14% of the approvals in our data (2014 - 2021) faced administrative appeals. We say *at least* 14% because we are not certain that we have located all records on local administrative appeals, as the city does not make past records on administrative appeals readily available online. It is also true that most of the appeals we could locate are denied or withdrawn, and most administrative appeals involve challenges to CEQA determinations as well.

San Francisco Planning's environmental planning division also tracks administrative appeals worked on by their team. This log captures appeals of residential and non-residential entitlements. We reviewed their log of staff hours spent on administrative appeals involving CEQA. Twenty out of 48 administrative appeals filed in 2015 - 2021 that San Francisco Planning tracked overlap with our 2014 - 2021 dataset. Of these 20, the internal department data offers information on cost and time for 19 of our observations. Although the other appeals are not for multi-family housing development, planners shared that these appeals also influence how planners work on housing entitlements. Out of the 20 administrative appeals associated with entitlements in the CALES dataset, San Francisco Planning data indicates that 11 (55%) were denied, five (25%) were withdrawn, only one was upheld, and three were closed with no other details.[79]

San Francisco Planning reports that it logged a total of 5,680.75 hours because of all 48 administrative appeals related to CEQA that they tracked from 2015 - 2021. San Francisco Planning logged a total of 3,031.25 additional staff hours to prepare for CEQA-related administrative appeals associated with entitlements in the CALES database. Translating these hours into days, we find that on average, planners add about 20 days of work per year to their workload to deal with CEQA-related administrative appeals for housing entitlements.

[79] This is consistent with what San Francisco Planning reports for all of the administrative appeals.

Table 11: Total Time Spent on All CEQA Appeals 2015-2021 N=48

(days)	Minimum	**Median**	Max.	**Mean**	**Standard Deviation**
Total Time Related to Admin. Appealed	0.56	8.69	71.06	15.11	14.92

Table 12: Total Time Spent on CEQA Appeals 2015-2021 for CALES Observations

(days)	Minimum	**Median**	Max.	**Mean**	**Standard Deviation**
Total Time Related to Admin. Appealed	1.88	12.78	71.06	19.94	18.05

Administrative appeals add costs to the developer in lost time and higher holding costs, but there are also direct costs to the city associated with the work to prepare for an appeal, even if the appeal is withdrawn. San Francisco Planning reported that all administrative appeals related to CEQA cost the city a total of $793,993 in the years where San Francisco tracked the data (2015-2021). Administrative appeals related to CEQA and associated with entitlements in the CALES dataset (2015-2021) cost the city a total of $421,314. One entitlement in our dataset, 1500-1540 Market Street,[80] required 374 additional staff hours and $52,204 in costs to San Francisco Planning to prepare for the appeal—even though the appeal was withdrawn.

Table 13: Total Cost CEQA Appeals 2015-2021 (N=48)

(USD)	Minimum	**Median**	Max.	**Mean**	**Standard Deviation**
Total Cost Related to Admin. Appeals	$535	$10,245	$81,558	$16,893	$16,860

Table 14: Total Cost CEQA Appeals CALES Housing Only (N=19)

(USD)	Minimum	**Median**	Max.	**Mean**	**Standard Deviation**
Total Cost Related to Admin. Appeal	$2,167	$13,741	$81,558	$22,174	$20,501

[80] This is a 100% market-rate mixed-use development that satisfied the inclusionary program with an in-lieu fee.