



September 9, 2025

Ms. Lydia So
President
SF Planning Commission
City and County of San Francisco
San Francisco, CA 94102

Re: Family Zoning Plan

Dear President So and the SF Planning Commissioners:

During the public hearings of the Historic Preservation Commission (HPC) on [August 20, 2025](#) and [September 3, 2025](#), San Francisco Planning Department staff provided an informational presentation on the Family Zoning Plan, including the updated zoning map proposal and upcoming zoning amendments to implement the Housing Element.

As you are aware, the HPC is charged with providing advice and guidance on historic preservation goals, policies, and programs to preserve, highlight, document, and formally acknowledge resources of historic and cultural significance.

While we make this a priority in our discussion and approval measures, we are also aware and supportive of the City and County of San Francisco's efforts to meet the state mandated goals to create new housing. As a Commission, we clearly understand the most pressing needs that are placed upon the City to fulfill this obligation, and feel that continuing to promote and preserve our most important historic and cultural assets will not impede any of these efforts.

Toward this end, we have summarized the discussion that took place at the most recent HPC Hearing on September 3, 2025, and would like to respectfully request the consideration of proactive measures under Requested Recommendations.

Discussion Summary

Commissioners and staff reviewed the following areas based on Commission comments and information received from members of the public:

1. The impacts of removing Category "A – Historic Resource Present" parcels from the proposed Family Zoning Plan or the Housing Choice SF Program (the "Local

Program”).¹ Commissioners understand that exempting these properties would decrease zoned housing capacity significantly and would very likely risk sending the City towards outcomes like the decertification of our approved Housing Element and ultimately the Builder's Remedy, which would be catastrophic for historic resources. Similarly, Commissioners understand the plan is necessary and the best way to guard ourselves against Builder's Remedy.

2. Commissioners also acknowledged the need for more housing, not only to meet state requirements, but also to address our housing affordability crisis. They identified the proposed Local Program as a promising strategy to create the required capacity while maintaining more local control over future development by requiring projects to meet the Preservation Design Standards and other objective requirements.
3. Commissioners reviewed incentives to result in the creation of new housing units while also preserving Category A properties (and possibly Category B, those properties whose historic status is unknown at this time) in the Family Zoning Plan. Incentive ideas included a program similar to the Article 11 Transfer of Development Rights (TDR) program and adaptive reuse of non-residential properties. Commissioners also highlighted the need for design standards for infill within all identified historic districts. Conversely, a Commissioner cited the need to track the loss of historic resources and determine criteria to monitor this tracking.
4. In addition to the existing “demolish” language for projects involving historic resources in the Family Zoning Plan, Commissioners explored a clear definition and the inclusion of “substantially alter” as an amendment to the Family Zoning Plan. This was raised after staff explained that the Planning Code as it stands today does not contain a definition to substantially alter a property and noted that it may not be possible to develop such a definition as an enforceable objective standard. However, the Planning Code does contain a definition for demolish in Article 10, which is objective in its implementation.
5. Staff also clarified that the flat policy requires a Conditional Use Authorization requirement for the removal or subdivision of residential flats unless the proposal results in a net increase in residential density.
6. The Commissioners reiterated the need to work with the State of California Office of Historic Preservation to expedite a procedure where all designated landmarks (individuals and historic districts) in the City and County of San Francisco are listed in

¹ Parcels (or properties) labeled Category “A” contain a historic resource. Because of this status, it is listed or determined eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources; locally designated via Article 10 (city landmarks) or Article 11; or because it has been identified as a historic resource under the California Environmental Quality Act (“CEQA”), a survey, or other work. This includes individual properties and historic district contributors as well as non-contributors.

the California Register of Historical Resources as a group of historic resources rather than requesting individual nominations, a request to the state that has been repeated from HPC hearings over the past few years.

7. Commissioners stressed the need to expedite the San Francisco Citywide Cultural Resources Survey (SF Survey) and Family Zoning Plan Landmark Designations Program in the rezoning area, including streamlining the landmarking process for individual properties and historic districts.

Requested Recommendations

The Historic Preservation Commission would like to respectfully request the following recommendations to the Family Zoning Plan:

1. Identification: Completion of SF Survey

Make it a priority for the Planning Department to expedite the completion of SF Survey in the Family Zoning Plan Area. This can be achieved by ensuring that staff have sufficient resources and funding to move SF Survey forward at an accelerated pace so that historic resources can be immediately identified.

2. Designation: Family Zoning Plan Landmark Designations Program

The Planning Department should also prioritize and expedite the Family Zoning Plan Landmark Designations Program and investigate ways to further streamline the landmarking process, which could include identifying additional resources or potentially developing trailing legislation to amend the designation process. The HPC would like to initiate this discussion as soon as possible.

3. Protection: Preservation Design Standards

The Planning Department should prioritize the completion of Preservation Design Standards for infill and new construction in historic districts.

4. Reuse: Adaptive Reuse Incentives

The Planning Department should develop new adaptive reuse incentives in the Family Zoning Plan and add adaptive reuse of historic properties as an incentive in the Local Program.

I have met with the Planning Director and staff to discuss the feasibility of incorporating these recommendations into the Department's work plan and into the proposed rezoning. They have shared actionable next steps for increasing the Department's commitments to accelerating recommendations 1-3 on this list. They also shared a recommended amendment to the rezoning to address recommendation 4, by creating an adaptive reuse incentive

through the Local Program. These are positive developments that can support the swift identification and protection of historic resources while still abiding by state housing requirements.

Thank you for your serious attention to this matter. I am happy to meet with the Planning Commission and Planning Department staff to begin to discuss and implement these measures in a timely manner.

Sincerely,



Diane Matsuda
President
Historic Preservation Commission
cc: San Francisco Board of Supervisors

Attachments

I am including all of the written correspondence that was provided at the HPC Hearings on this matter for your further information.

- SF Heritage Letter
- Courtney Damkroger
- Bridget Maley
- Telegraph Hill
- Georgia Shuttish

From: Woody LaBounty <wlabounty@sfheritage.org>

Sent: Tuesday, September 2, 2025 10:16 AM

To: Matsuda, Diane (CPC) <diane.matsuda@sfgov.org>

Cc: Foley, Chris (CPC) <chris.foley@sfgov.org>; Baldauf, Hans (CPC) <hans.baldauf@sfgov.org>; Vergara, Robert (CPC) <robert.vergara1@sfgov.org>; Baroni, Dan (CPC) <Dan.Baroni@sfgov.org>; Sucre, Richard (CPC) <richard.sucre@sfgov.org>; Chen, Lisa (CPC) <lisa.chen@sfgov.org>; Dennis Phillips, Sarah (CPC) <sarah.dennis-phillips@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Tsern Strang, Gayle (CPC) <gayle.tsernstrang@sfgov.org>; eleanor.cox@sfgov.org <eleanor.cox@sfgov.org>

Subject: Family Zoning Plan Resolution

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Dear President Matsuda,

I understand that the Historic Preservation Commission (HPC) plans to draft a resolution in response to the current version of Mayor Lurie's Family Zoning Plan at tomorrow's September 3, 2025 meeting. San Francisco Heritage would like to offer a few suggestions to consider:

1. While the ongoing city survey and recent Planning Department effort to batch and accelerate city landmark designations is welcome, the process is still lengthy. There is uncertainty as to whether all city supervisors will participate in the plan, jeopardizing our shared goal to have historic designations justly represent the diversity of San Francisco and its people. Upzoning will immediately change values and put thousands of potential historic buildings in a highly vulnerable position from development. The city survey and accelerated landmarking program aren't enough to protect potential landmarks and districts in the face of this sweeping change.
2. San Francisco Heritage suggests excluding from the zoning plan the "Category A" parcels that the Planning Department has already identified as potentially historic. Planning reports that these Category A's are about 14% of the properties in the proposed zoning map. This would leave 85% of the land, more than 79,000 parcels, available to meet the Family Zoning Plan's unit targets. Exclusion would give the city survey team time to finish assessing the Category A's for possible designation.
3. The Planning Department has suggested that 79,000 parcels may not offer enough capacity to meet the Housing Element's targeted number of units, I presume because of factors inhibiting increased density on other parcels, such as special zoning or rent-controlled buildings. While San Francisco Heritage does not concede this point and asks the HPC to request a true and detailed analysis from Planning, exclusion of the Category

A sites on commercial corridors, where upzoning is projected to produce most new units, must be a priority.

4. Lastly, changes in state laws and new proposed legislation make local, state, and national designation the most significant factors in protecting historic properties. The city's Planning Department has a skilled preservation team to make evaluations, but there is no mandate, requirement, or trigger for the city to designate individual landmarks or historic districts. It is usually left to city supervisors to initiate the process or brought to the city by community groups spearheading and paying for nominations.

As the city survey team continues its effort and identifies even more historic resources, the City of San Francisco has to have a plan to finish the job and make official designations, including of historic districts.

The Planning Department's Historic Preservation program needs a revised over-arching framework and strategy for preservation in the city to address this issue and adequately respond to a changed landscape. San Francisco Heritage would welcome joining the Historic Preservation Commission, the Planning Department, and the mayor's office in crafting a new path forward aligned with Mayor Lurie's priorities and our shared desire to protect San Francisco's special places.

Thank you for your consideration of these points and suggestions.

Woody



Woody LaBounty
President & CEO
he/him/his

SAN FRANCISCO HERITAGE
On Unceded Ramaytush Ohlone Land
HAAS-LILIENTHAL HOUSE
2007 FRANKLIN STREET
SAN FRANCISCO, CA 94109
P: 415.441.3000 x 104

www.sfheritage.org
wlabounty@sfheritage.org

Join Heritage Now



SFH
Letter-Family-Zoning

September 2, 2025

Diane Matsuda, president
Historic Preservation Commission
City Hall
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94103

Re: Family Zoning Plan Resolution at September 3, 2025 Meeting

Dear President Matsuda,

I understand that the Historic Preservation Commission (HPC) plans to draft a resolution in response to the current version of Mayor Lurie's Family Zoning Plan at its September 3, 2025 meeting. San Francisco Heritage would like to offer a few suggestions to consider:

- 1) While the ongoing city survey and recent Planning Department effort to batch and accelerate city landmark designations is welcome, the process is still lengthy. There is uncertainty as to whether all city supervisors will participate in the plan, jeopardizing our shared goal to have historic designations justly represent the diversity of San Francisco and its people. Upzoning will immediately change values and put thousands of potential historic buildings in a highly vulnerable position from development. The city survey and accelerated landmarking program aren't enough to protect potential landmarks and districts in the face of this sweeping change.
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- 4) Lastly, changes in state laws and new proposed legislation make local, state, and national designation the most significant factors in protecting historic properties. The city's Planning Department has a skilled preservation team to make evaluations, but there is no mandate, requirement, or trigger for the city to designate individual landmarks or historic districts. It is usually left to city supervisors to initiate the process or brought to the city by community groups spearheading and paying for nominations.

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Thank you for your consideration of these points and suggestions.

Sincerely,



Woody LaBounty
President & CEO
San Francisco Heritage
wlabounty@sfheritage.org
415-441-3000 x104

From: Courtney Damkroger <cdamkroger@hotmail.com>

Sent: Tuesday, September 2, 2025 7:33 PM

To: Matsuda, Diane (CPC) <diane.matsuda@sfgov.org>; Tsern Strang, Gayle (CPC) <gayle.tsernstrang@sfgov.org>; Baldauf, Hans (CPC) <hans.baldauf@sfgov.org>; Baroni, Dan (CPC) <Dan.Baroni@sfgov.org>; Foley, Chris (CPC) <chris.foley@sfgov.org>; Vergara, Robert (CPC) <robert.vergara1@sfgov.org>; eleanor.cox@sfgov.org <eleanor.cox@sfgov.org>

Cc: Sucre, Richard (CPC) <richard.sucre@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Dennis Phillips, Sarah (CPC) <sarah.dennis-phillips@sfgov.org>; Woody LaBounty <wlabounty@sfheritage.org>

Subject: Item 4. Family Zoning 9/3/25 HPC

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Please find my letter attached and below:

Dear President Matsuda and Members of the Commission:

There are two key points I wish to convey. The first is to reiterate that all Category A buildings should be exempt from the proposed upzoning and second, under Article 10, the HPC has the responsibility to review any ordinances concerning historic preservation and to submit reports regarding those resources to the Planning Commission or Board of Supervisors, whichever is applicable.

Category A Buildings should be exempt:

- The department's program to survey and designate historic resources on an accelerated schedule is an excellent effort, but it is not enough given the timing, breadth and intensity of the proposed upzoning.
- While not a new request from the preservation community, exempting Category A buildings is the most effective measure to deal with potential threats to historic resources at this time.
- Action 4.5.5. (Appendix D - General Plan Consistency 2014 Housing Element, page 16 of the Housing Element adopted in 2023) stated that the City should:

Designate historically and culturally significant buildings, landscapes, and districts for preservation using the Citywide Cultural Resource Survey, Planning Code Articles 10 and 11, and state and national historic resource registries to ensure appropriate treatment of historic properties that are important to the community and to unlock historic preservation incentives for more potential housing development sites.

The quality and skill of the Planning Department's preservation staff is impressive.

However, lacking a true and ready commitment from city leadership and the Planning Department to preserve our historic and cultural resources, they will not be prioritized. Clear, firm, direction from the HPC is critical.

HPC responsibility to review ordinances and resolutions (SEC. 1002. POWERS AND DUTIES OF PLANNING DEPARTMENT AND HISTORIC PRESERVATION COMMISSION):

Given the direction of Article 10, the HPC has the responsibility to review the language of the proposed rezoning ordinances where designated and eligible historic and cultural resources are affected. For example, on Page 12, Lines 8-11 Housing Choice-SF Program and Page 25 lines 1-4, Housing Sustainability District (FILE NO. 250701 ORDINANCE NO. [Planning, Business and Tax Regulations Codes - Family Zoning Plan])[[1](#)] the proposed language should be improved to include “substantial alteration” as well as protections for buildings and sites identified in adopted surveys, buildings listed or potentially eligible for individual listing in the California Register of Historical Resources or on the National Register of Historic Places, or buildings located within listed or potentially eligible National Register or California Register historic districts as well as all buildings identified as “Category A” buildings.

Highlighted here are just two of several sections in the proposed ordinances that deal with historic resources and Legacy Businesses and where HPC review and comment is warranted.

Thank you for the opportunity to comment.

Sincerely,

Courtney Damkroger

[1] (<https://sfgov.legistar.com/View.ashx?M=F&ID=14558815&GUID=4D6988AD-9941-422E-8CCA-67AAD8523F82>)

cc: Woody LaBounty, SF Heritage



2025 9 3 HPC ltr
Upzoning.docx

[1] (<https://sfgov.legistar.com/View.ashx?M=F&ID=14558815&GUID=4D6988AD-9941-422E-8CCA-67AAD8523F82>)

September 2, 2025

Diane Matsuda, President
Historic Preservation Commission
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94103

Re: Item 4--Family Zoning Plan

Dear President Matsuda and Members of the Commission:

There are two key points I wish to convey. The first is to reiterate that all Category A buildings should be exempt from the proposed upzoning and second, under Article 10, the HPC has the responsibility to review any ordinances concerning historic preservation and to submit reports regarding those resources to the Planning Commission or Board of Supervisors, whichever is applicable.

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The quality and skill of the Planning Department's preservation staff is impressive. However, lacking a true and ready commitment from city leadership and the Planning Department to preserve our historic and cultural resources, they will not be prioritized. Clear, firm, direction from the HPC is critical.

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Highlighted here are just two of several sections in the proposed ordinances that deal with historic resources and Legacy Businesses and where HPC review and comment is warranted.

Thank you for the opportunity to comment.

Sincerely,

Courtney Damkroger

cc: Woody LaBounty, SF Heritage

¹ (<https://sfgov.legistar.com/View.ashx?M=F&ID=14558815&GUID=4D6988AD-9941-422E-8CCA-67AAD8523F82>)

From: Bridget Maley <bridget@architecture-history.com>

Sent: Tuesday, September 2, 2025 10:35 PM

To: Matsuda, Diane (CPC) <diane.matsuda@sfgov.org>; Tsern Strang, Gayle (CPC) <gayle.tsernstrang@sfgov.org>; Baldauf, Hans (CPC) <hans.baldauf@sfgov.org>; Baroni, Dan (CPC) <Dan.Baroni@sfgov.org>; Foley, Chris (CPC) <chris.foley@sfgov.org>; Vergara, Robert (CPC) <robert.vergara1@sfgov.org>; eleanor.cox@sfgov.org <eleanor.cox@sfgov.org>
Cc: Lurie, Daniel (MYR) <daniel.lurie@sfgov.org>; Sherrill, Stephen (BOS) <Stephen.Sherrill@sfgov.org>; Dennis Phillips, Sarah (CPC) <sarah.dennis-phillips@sfgov.org>; Segal, Ned (MYR) <ned.segal@sfgov.org>; Sucre, Richard (CPC) <richard.sucre@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Woody LaBounty <wlabounty@sfheritage.org>; Courtney Damkroger <cdamkroger@hotmail.com>; Katherine Petrin <petrin.katherine@gmail.com>; Lori Brooke <neighborhoodsunitedsf@gmail.com>; Dennis Richards <drichards20@outlook.com>

Subject: Item 4: "Family Zoning" HPC Calendar Sept 3 2025

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear President Matsuda and Historic Preservation Commissioners:

Thank you for the opportunity to comment on the "Family Zoning" Item 4 on your agenda for September 3, 2025. The mayor's proposal is a drastic Upzoning Plan that will fuel speculative development, encourage demolition of historic buildings, and result in displacement of residential tenants and small businesses. It will have the opposite effect and will push working class families out of our city.

Unfortunately, I cannot attend the meeting in person. I would like to point out several serious issues with the Upzoning Plan that other preservation professionals, including Courtney Damkroger, a former Commissioner, have highlighted in comments to the Commission.

First, all Category A Historic Buildings should be exempt from the proposed Upzoning Plan. The Final 2022 Housing Element EIR noted on page 4.2-82 that:

"Specifically, the department's projection assumes that Category A resource status would act as a development constraint for future development. The Housing Element 2022 Update Modeling and Projections Memorandum included in Appendix C of this EIR presents additional information about the modeling and growth assumptions used in the department's housing growth projection."

"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."

The proposed Upzoning Plan and accompanying legislation does not exempt Category A buildings, conflicting with what the Housing Element indicated would be protected.

Second, under Article 10, the HPC has the responsibility to review any ordinances concerning historic preservation and to submit reports regarding those resources to the Planning Commission or Board of Supervisors, whichever is applicable. As such, the Commission should push for exemptions of Category A Buildings and other policies and provisions that will protect our city's treasured historic and cultural resources, historic districts and historic neighborhoods that contribute to our tourist economy, drawing visitors from around the world. The Commission should be designating historically and culturally significant buildings, landscapes, and districts for preservation using the Citywide Cultural Resource Survey, Planning Code Articles 10 and 11, and on state and national historic resource registries to ensure appropriate treatment of historic properties that are important to the community. Designation will unlock historic preservation incentives that could be used to enhance and preserve historic buildings for housing. Clear, firm, direction from the Historic Preservation Commission is critical.

Lastly, why is the item not a regular calendar item on your agenda? This issue deserves more input and review than as a "Commission Matters" item. One of you should suggest it be moved from this portion of the agenda to a regular item at the beginning of the hearing.

San Francisco is unlike any other city in the United States. If we erode our city's historic and cultural character through drastic upzoning, we will regret these actions just as we now regret the demolition and displacement that occurred in the historic Fillmore and Western Addition neighborhoods and other redevelopment areas of the 1960s and 1970s.

The Historic Preservation Commission is a City Charter Commission. The citizens of San Francisco are looking to you for leadership at this critical moment.

Thank you for the opportunity to comment.

Sincerely,
Bridget Maley
Former Landmarks Preservation Advisory Board President (appointed by Mayor Gavin Newsom)
LBE Certified Small and Woman-Owned Business Owner
Member Neighborhoods United SF (NUSF)

--

bridget maley
architecture + history, llc
415 . 760 . 4318
san francisco, ca

www.architecture-history.com

From: Nancy Shanahan <nshan@mindspring.com>

Sent: Tuesday, August 19, 2025 1:51 PM

To: Matsuda, Diane (CPC) <diane.matsuda@sfgov.org>; Foley, Chris (CPC) <chris.foley@sfgov.org>; Baldauf, Hans (CPC) <hans.baldauf@sfgov.org>; Baroni, Dan (CPC) <Dan.Baroni@sfgov.org>; Vergara, Robert (CPC) <robert.vergara1@sfgov.org>; Tsern Strang, Gayle (CPC) <gayle.tsernstrang@sfgov.org>; Wright, Jason (CPC) <jason.wright@sfgov.org>; eleanorruth802@gmail.com <eleanorruth802@gmail.com>

Cc: Woody LaBounty <woody@outsidelands.org>; Katherine Petrin <petrin.katherine@gmail.com>; Chen, Lisa (CPC) <lisa.chen@sfgov.org>

Subject: Comments on Family Zoning Plan (Housing Element Rezoning Program) 2021-005878CWP

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear President Matsuda and Commissioners,

Please see the attached letter from the Telegraph Hill Dwellers sharing our concerns with Mayor Lurie's proposed rezoning ordinance and the potentially significant impacts it will have on the historic resources of San Francisco.

We hope that the Commission will recommend the changes set forth in our letter to safeguard our City's important historic resources by (1) removing from the upzoning plan the recently added areas of District 3 that include designated and eligible historic districts; (2) broadening the definition of historic buildings that would be ineligible for demolition under the upzoning ordinance; and (3) recommending that the Preservation Design Standards be amended to apply to all properties in historic districts.

Thank you for your consideration of our concerns and recommendations.

Sincerely,

Sincerely,

Stan Hayes and Nancy Shanahan, Co-Chairs

Telegraph Hill Dwellers

Planning and Zoning Committee



THD letter to HPC
8.19.25.pdf

August 19, 2025

Diane Matsuda, President
San Francisco Historic Preservation Commission
49 S. Van Ness, Suite 1400
San Francisco, CA 94103
Via email: diane.matsuda@sfgov.org



RE: Comments on Family Zoning Plan (Housing Element Rezoning Program) 2021-005878CWP

Dear President Matsuda and Commissioners,

On behalf of the Telegraph Hill Dwellers (THD), a neighborhood organization representing over 500 members in North Beach and Telegraph Hill, we are writing to share our concerns with Mayor Lurie's proposed rezoning ordinance and the potentially significant impacts it will have on the historic resources of San Francisco. Although we support the Planning Department's two preservation initiatives, they will do little to counter the impending threats to our recognized historic buildings and districts from the massive upzoning plan, density decontrol, and ministerial approvals contained in the proposed rezoning ordinance.

To lessen the threats to historic resources, we have the following observations and recommendations for your consideration.

First, we are seriously concerned by the late inclusion within the rezoning plan of the Telegraph Hill Historic District and significant portions of the proposed North Beach National Register Historic District whose nomination is pending. The Washington Square Historic District and the Powell Street Shops Historic District, both recognized as eligible for the California Register, are also now included within the upzoning area. None of these historic areas were included in the 2022 Updated Housing Element or considered in the Housing Element EIR. Nor were they included in any of the previously proposed upzoning maps until after Mayor Lurie introduced his rezoning map in April. [Please see Attachment] We respectfully ask the Commission to recommend the removal of these historic areas from the upzoning Plan.

Second, we urge that the Commission recommend proposed changes to two sections of the proposed rezoning legislation to broaden the definitions of the historic buildings that would be ineligible for demolition under the Housing Choice -San Francisco Program (HC-SF) and Housing Sustainability District (HSD). Please consider recommending the following additions:

Page 12, Lines 8-11 and on Page 25, Lines 1-4:

(4) *The project does not demolish or substantially alter 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, buildings and districts identified in adopted surveys, buildings listed or potentially eligible for individual listing in the California Register of Historical Resources or on the National Register of Historic Places, or buildings located within listed or potentially eligible National Register or California Register historic districts.*

Finally, we urge the Commission to please recommend that the Preservation Design Standards (PDS) be amended to apply to all properties in historic districts. In direct conflict with Articles 10 and 11, which apply to all new construction and alteration of properties in historic districts, the PDS apply solely to contributors to historic districts or to Category A properties that have been determined individually

significant. Historic districts are a mosaic, greater than the sum of their parts, not merely a loose collection of separate individually listed or contributing buildings. Applying standards to a small subset of buildings in a historic district, while allowing the remaining others to be demolished, altered, and developed without PDS controls, risks a steady erosion of the historic character of the districts. Extension of the PDS to all properties within historic districts would better protect the historic character of districts, which together comprise just a small percentage of San Francisco's land area (e.g., Article 10 historic districts together are estimated to be approximately 3-5 percent of the City's total land area).

* * * * *

In conclusion, we hope that you will recommend changes that will safeguard important historic resources by (1) removing designated and eligible historic districts from the upzoning plan as stated above; (2) broadening the definition of historic buildings that would be ineligible for demolition under the upzoning ordinance as suggested above; and (3) recommending that the Preservation Design Standards be amended to apply to all properties in historic districts.

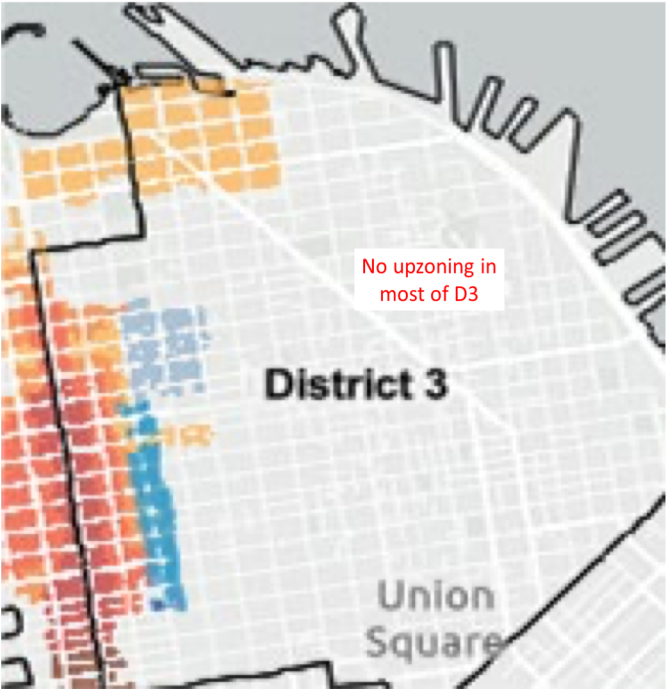
Sincerely,

Stan Hayes and Nancy Shanahan, Co-Chairs
Planning and Zoning Committee

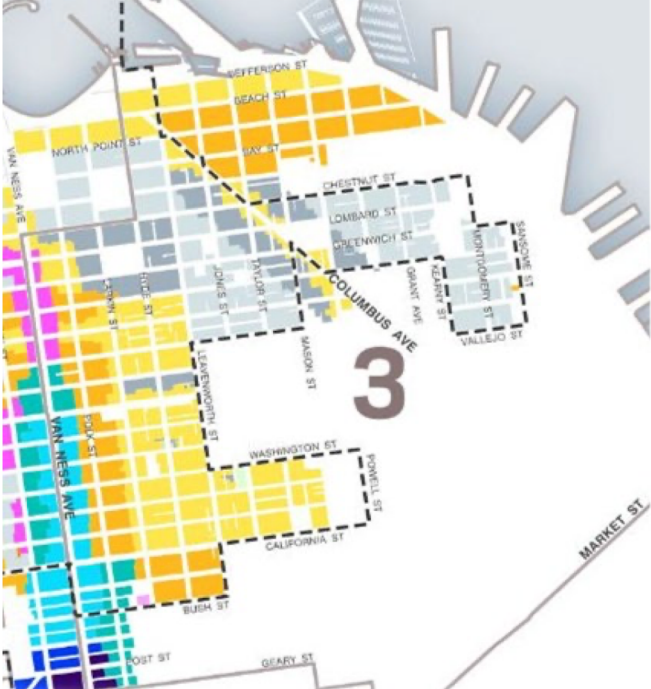
cc: Chris Foley, Vice President chris.foley@sfgov.org
Hans Baldauf, Commissioner hans.baldauf@sfgov.org
Dan Baroni, Commissioner dan.baroni@sfgov.org
Robert Vergara, Commissioner robert.vergaral@sfgov.org
Gayle Tsern Strang, Commissioner gayle.tsernstrang@sfgov.org
Jason Wright, Commissioner jason.wright@sfgov.org
Eleanor Cox, Commissioner eleonoruth802@gmail.com
Woody LaBounty Wlabounty@sfheritage.org
Katherine Petrin petrin.katherine@gmail.com
Lisa Chen Lisa.Chen@sfgov.org

Enc: Attachment

Mayor Breed's Upzoning Map 2024



Mayor Lurie's Upzoning Map June 2025



From: Thomas Schuttish <schuttishtr@sbcglobal.net>

Sent: Wednesday, August 27, 2025 9:17 AM

To: Matsuda, Diane (CPC) <diane.matsuda@sfgov.org>; Foley, Chris (CPC) <chris.foley@sfgov.org>; Baldauf, Hans (CPC) <hans.baldauf@sfgov.org>; Baroni, Dan (CPC) <Dan.Baroni@sfgov.org>; Tsern Strang, Gayle (CPC) <gayle.tsernstrang@sfgov.org>; Vergara, Robert (CPC) <robert.vergara1@sfgov.org>

Cc: CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Sucre, Richard (CPC) <richard.sucre@sfgov.org>; Chen, Lisa (CPC) <lisa.chen@sfgov.org>; Tanner, Rachael (CPC) <rachael.tanner@sfgov.org>; Switzky, Joshua (CPC) <joshua.switzky@sfgov.org>; Bishop, Melanie (CPC) <melanie.bishop@sfgov.org>; CPC - Survey Team <CPC.Survey@sfgov.org>; peter.miljanich@sfgov.org <peter.miljanich@sfgov.org>; YANG, AUSTIN (CAT) <Austin.Yang@sfcityatty.org>; JENSEN, KRISTEN (CAT) <Kristen.Jensen@sfcityatty.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>

Subject: Follow up to HPC Meeting on August 20th

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Dear Commissioners:

This email is a follow up on the issue of codifying the Residential Flat Policy (Resolution 20024).

Under the Rezoning the reason for this is to: *"Codify Planning Commission's Flats Policy to help preserve this family-friendly housing type"*. It is a noble goal.

At the August 20th HPC hearing, Commissioners were concerned about how to protect and preserve sites if they have not yet been analyzed by the Survey, particularly due to the large number of properties currently ranked as "B" and the importance of those currently ranked as "A".

There is no doubt that San Francisco needs to increase the amount of housing.

However, the City doesn't want to lose existing multi-unit housing and existing historic resources.

The Staff has repeatedly stated that existing multi-unit buildings, particularly if they are tenant occupied will have protection.

It is important to preserve Residential Flats, especially if they are determined to have historic and cultural value.

Flats can be found all over the City, in every neighborhood. They provide housing if currently occupied and housing for future occupants.

The HPC has adopted one Context Statement on Flats, and another is in the works.

It makes sense to have really stringent Code language to protect and preserve this existing typology of San Francisco housing.

One way to do that, in addition to a review preserving facades, would be to limit the amount of interior demolition allowed during an Alteration to between 10% to 15%. This would allow for reasonable remodeling/upgrading and not the total relocation and reconfiguration of each Flat.

During my comments at the August 20th hearing I said I would follow up with other examples.

Attached right below is a pdf about 64-66 Beaver Street. Next to this pdf, is a very brief video that shows the sliding door connecting the two units. The video was made at the open house in April and sent to me.

The property, two legal Flats per the Assessor's Info, was marketed and sold as a single family home for \$5.6 million in April 2025.

Right below is another pdf showing the pairs of Flats adjacent to 64-66 Beaver Street prior to the "Alteration", along with two pages from the Context Statement for "Flats and Small Apartments (1915-1978)".

This group of six Flats, three with barrel-front bays and three with an angled bays, should have been analyzed by the Survey.

According to the SFPIM all are "A" rated because they are located in the "Eligible Duboce Triangle Historic District Extension".

However, despite what it says on the SFPIM, 64-66 Beaver Street was listed as a "B" on the 2019 HRA and then lowered to a "C" during the review of the Alteration.

And in terms of providing multi-unit housing, it is fair to say that it can no longer be considered a pair Flats given they are internally connected via the sliding door in the video.

(The Beaver Street project *got around* the Flat Policy which went into affect on October 12, 2017).

This project at 64-66 Beaver Street had a **68% interior demolition**.

And as you can see in the first pdf above the exterior no longer resembles the original pair of Flats (or the adjacent Flats) and doesn't even look like a typical pair of Flats due to the totally redone front facade.

Here in the next pdf right below is another example of another "Alteration" that was in another group of Flats.

This pdf shows a photo of 112 Mallorca Way and it is pretty obvious which structure had the "Alteration" within this group of A-rated Flats in the "Eligible Marina Corporation Residential Historic District". (The legal address is 112-114 Mallorca Way.)

This was an Alteration of a pair of Flats into a SFH that was approved over 20 years ago which is why there is no "before" photo from Google Earth.

But it is fair to assume it looked like the other pairs of Flats in the large group designated in the Sanborn Map. (This Alteration was also prior to the implementation of Planning Code Section 317 and there is no historic review analysis uploaded to the SFPIM as with the Beaver Street project).

This group of Flats was built in 1924. According to the SFPIM, the altered structure retained its A-rating after the facade change and the vertical expansion and the merging of the Flats.

It is important to preserve the exterior of Flats that the Survey may deem worthy as a cultural and historic resource.....but it is also important to preserve the housing that Flats provide.

This is housing that the City has determined provides homes for middle income, moderate income families and is "*family-friendly*".

And the interior and the exterior are equally important. Buildings that are clearly a pair of Flats in the PROW should also be a pair of Flats inside with the typical floor plan that reflects the original interior as built.

Attached below is an array of the six pairs of adjacent Flats on Beaver Street from Google Earth photos in 2019, *prior* to the Alteration and sale of 64-66 Beaver Street to compare with the photo of the Flats on Mallorca Way in the pdf above and with the examples in the Survey in the other pdf above.

I hope that the HPC in their letter to the Planning Commission will encourage a more stringent definition of Demolition to preserve the interior configuration of Flats by limiting the amount of interior Demolition allowed when granting an Alteration permit for Flats. This could best preserve this *"family friendly housing"*. And of course preserve the facades of Flats that the Survey may find to be eligible as a historic and cultural resource.

Sincerely,
Georgia Schuttish



FLAT LOOPHOLE
EXAMPLE copy.pdf



IMG_6994.mov



Comparison Survey
w Beaver.pdf



CURRENT

(Note placement of front doors from street on opposite sides of garage)

Asking Price: **\$5.995 Million** (See Page 5 for sales history)

Original Asking Price Prior to Permit Issuance: **\$2.455 Million** (Owned by “LP” using just one street address, even though property legally two addresses).

Main Site Permit Value: **\$572 Thousand**

2019



2021





Rear Facade Before



Rear Facade After

10/25/2024	\$5,995,000	PriceChange
06/17/2024	\$6,795,000	Listed For Sale
10/11/2018	\$2,455,000	Sold

5 bed 6.5 bath 4,057 sqft 2,875 sqft lot

66 Bayview St, San Francisco, CA 94114

Est.\$39,029/mo

Get pre-approved



Single family
Property type



10 days
On Realtor.com



\$1,478
Price per sqft



1 Car
Garage



2024
Year built

66 Bayview St, San Francisco, CA 94114, a wonderful five bedroom, six and a half bath modern property with a truly rare combination of an A+ location, unobstructed San Francisco views and a deep level yard with exquisite architectural design by EAG Studio and Design 1618. This spacious 3 level 2 unit home was designed to allow natural light to flow through every corner. The second level consists of four bedrooms (three ensuite) shared between the two residences and four bathrooms as well as a comfortable lounge. The upper level of the residence features a large primary suite with walk in closet and well-appointed primary as well as a great room with an expansive chef's kitchen, with large pantry, dining room and full width living room with immediate access to a view terrace with commanding views of downtown San Francisco. The home features European oak stairway and floors and well-lit living spaces including a grand 11+/- foot entertainment room with floor to ceiling windows and doors opening to a custom patio and large yard with lush plantings as a backdrop as well as a mature tree canopy for shade and privacy. 3 car parking with interior access, package delivery closet, air conditioning (upper level) and outdoor kitchens on roof terrace and the rear yard complete this unique & special offering [Show less](#)

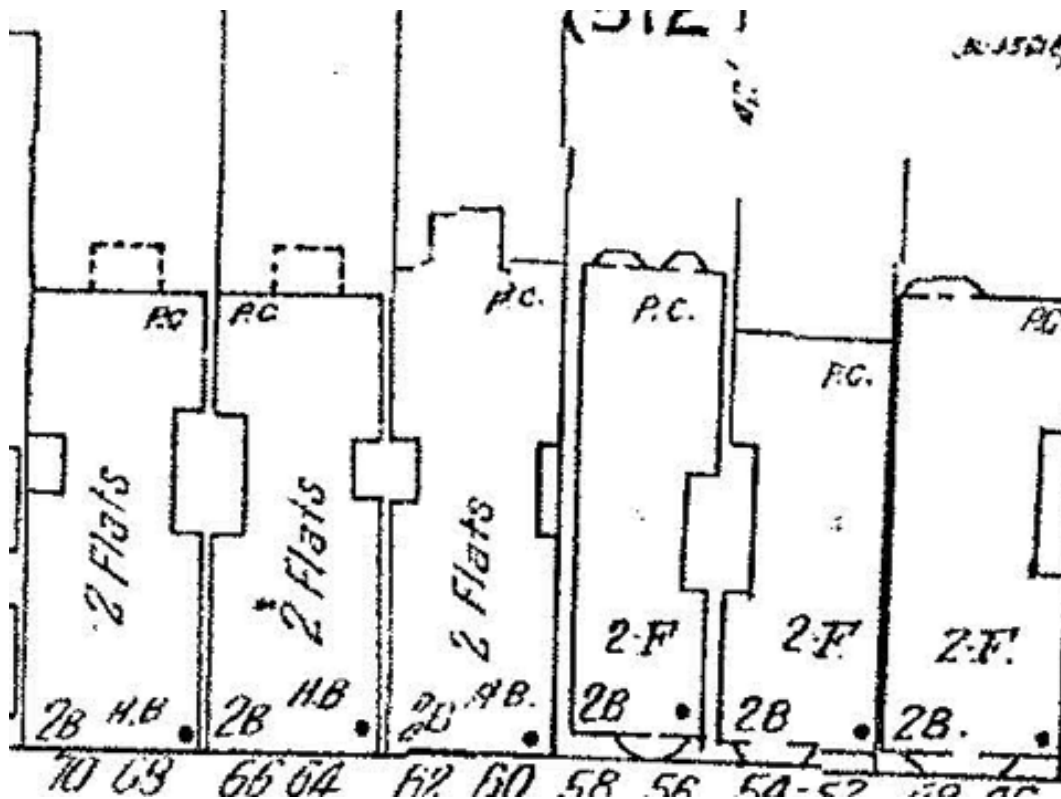
SEE "PROPERTY TYPE" ABOVE.

THIS IS LISTED ON THE INTERNET AS "SINGLE FAMILY". NOT A "MULTI-UNIT" PROPERTY TYPE OR AS A "FLATS" AS LISTED ON SFPIM.

ADDITIONALLY IT HAS BEEN ON (AND OFF) THE MARKET FOR MANY MONTHS.

NO DATE LISTED WHEN CFC WAS ISSUED PER SFPIM.

Assessed Values		Construction Type	Wood or steel frame
Land	\$1,879,428.00	Use Type	Flats & Duplex
Structure	\$1,005,468.00	Units	2
Fixtures	-	Stories	2
Personal Property	-	Rooms	10
Last Sale	10/11/2018	Bedrooms	6
Last Sale Price	\$2,455,000.00	Bathrooms	2
Year Built	1916	Basement	650 sq ft
Building Area	3,250 sq ft	Parcel Shape	-
Parcel Area	2,874 sq ft	Parcel Depth	-
Parcel Frontage	-		



FROM SF PIM. ASSESSOR'S INFO HAS USE TYPE AS "FLATS & DUPLEX"

SANBORN MAP SHOWS ROW OF FLATS INCLUDING SUBJECT OF THIS PDF (Second from Left).

Six pairs of "2 Flats" or "2-F"



ORIGINAL FRONT DOORS

AND

**DESCRIPTION FROM WEB
AD FROM 2018 SALE.**

**PURCHASED BY A
LIMITED PARTNERSHIP**

About this home

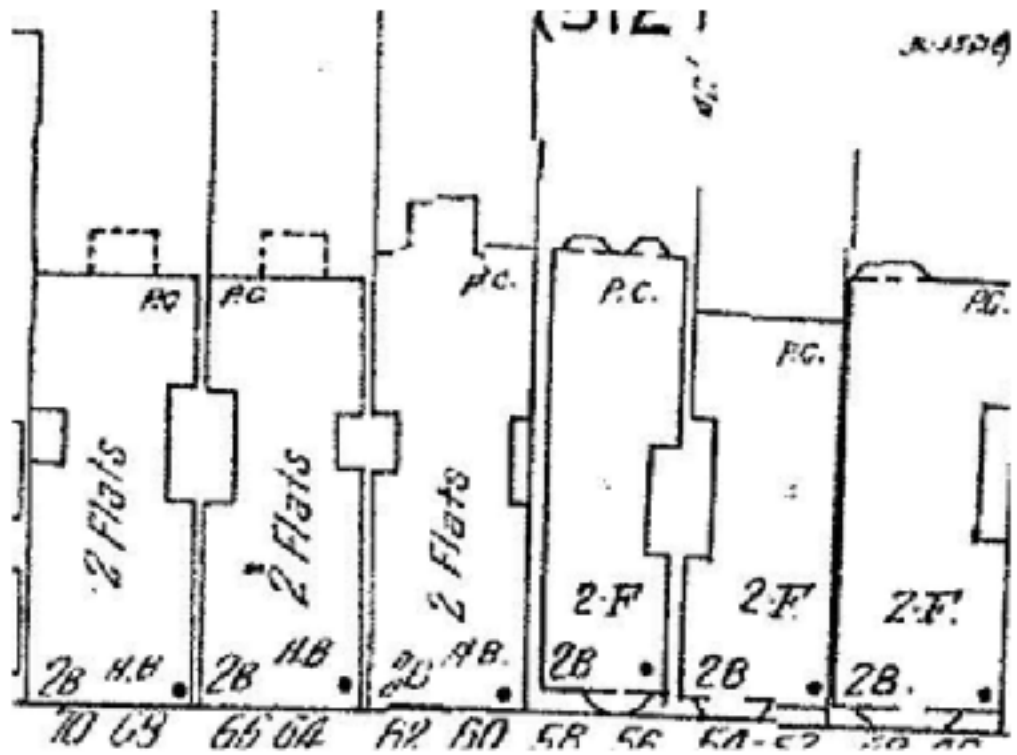
Attractive Edwardian duplex on a quiet, residential street in the Castro sector of the Duboce Triangle. This home is only a few blocks from MUNI, a wide variety of shops and restaurants, famous Castro Theater, and lovely, local area parks. Excellent opportunity with this charming two-family home. Each unit features a large living room with fireplace, formal dining room with original wainscot paneling, kitchen with adjacent pantry, two bedrooms with sizable closets, and split baths. Also featured are original, solid oak floors and charming crown and baseboard molding. Additionally, panoramic views, large backyard, tandem garage parking (2 to 3 cars) with automatic overhead door, and two sizable storerooms. Walk Score = 94; Transit Score = 97. This sale is subject to Confirmation by the Superior Court pursuant to the California Probate Code. No offers will be considered without signed disclosures available from listing broker. Offers are due no later than June 27, 2018 at 5pm.

This example is located in the Family and Senior Housing SUD.

And the CNLR SUD.

The original Flats comply with these SUDs.

The current project for sale does not comply.



EXAMPLE: ELIGIBLE DISTRICT CONTRIBUTOR

- 3321-3323 Scott Street (c.1923)
 - Example of Barrel-Front flat building unique to San Francisco and common in neighborhoods like the Marina
 - Relatively unaltered/high level of integrity
 - Potentially eligible under Criterion A/1 (Events) and C/3 (Architecture) as part of an intact row of 6 Barrel-Front flats



FLATS AND SMALL APARTMENT BUILDINGS (1915-1978) HISTORIC CONTEXT STATEMENT

Goals:

- Identify essential historic features to protect
- Provide property owners, tenants, and planners information about historic designs, materials, and finishes to facilitate appropriate rehabilitation
- Provide greater transparency and consistency of property evaluations through SF Survey

