



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)



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 to 107). 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 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.



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_cat&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 uncoded		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 <u>displaced businesses</u> .	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

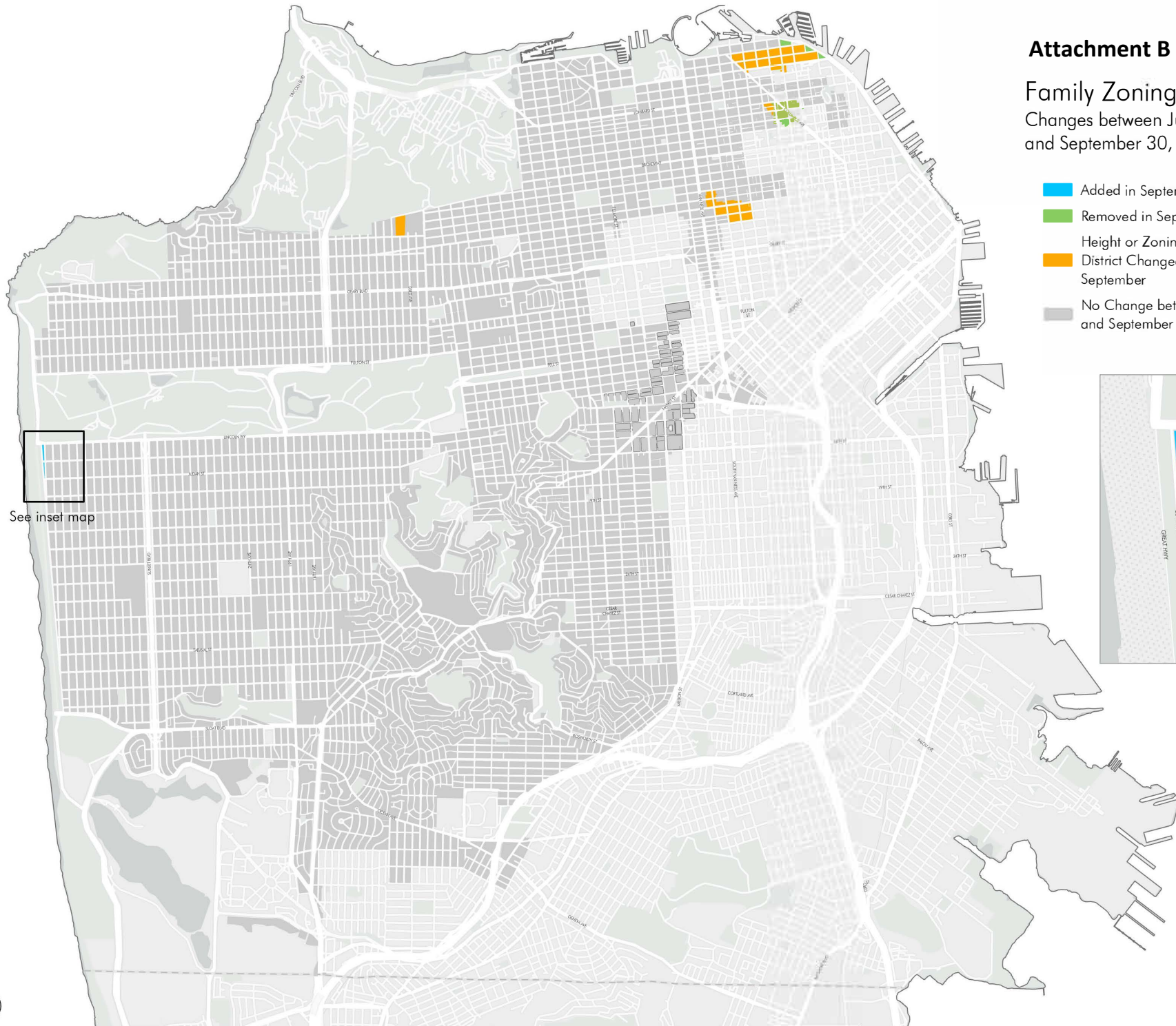
14		209.4	Edit the Use Size Control for the RTO-C district and delete the first clause ("P: up to 4,999 gross square feet per lot") so that it reads as follows: "P: Non-Residential use of any size that is part of a project where at least 2/3 of the floor area contains Residential uses. C: Non-residential 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 uncoded	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 uncoded	Uncoded 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 uncoded	Add uncoded 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

