



# SAN FRANCISCO PLANNING DEPARTMENT

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June 20, 2019

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

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

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Planning  
Information:  
**415.558.6377**

**Re: Transmittal of Planning Department Case Number 2018-013861MAP:  
Oceanview Large Residence Special Use District  
Board File No.180939  
Planning Commission Recommendation: Approval**

Dear Ms. Calvillo and Supervisor Safai,

On June 13, 2019, the Planning Commission conducted a duly noticed public hearing at a regularly scheduled meeting to consider the proposed Ordinance, introduced by Supervisor Safai that would amend the Planning Code and Zoning Map to create the Oceanview Large Residence Special Use District. At the hearing the Planning Commission recommended approval.

The proposed amendments are not defined as a project under CEQA Guidelines Section 15060(c) and 15378 because they do not result in a physical change in the environment.

Please find attached documents relating to the actions of the Commission. If you have any questions or require further information please do not hesitate to contact me.

Sincerely,

**DIPLO R. SANCHEZ FOR:**

Aaron D. Starr  
Manager of Legislative Affairs

cc:

Robb W. Kapla, Deputy City Attorney  
Suha Sandoval, Aide to Supervisor Safai  
Erica Major, Office of the Clerk of the Board

Attachments:

Planning Commission Resolution  
Planning Department Executive Summary



# SAN FRANCISCO PLANNING DEPARTMENT

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## Planning Commission Resolution No. 20463 HEARING DATE JUNE 13, 2019

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*Project Name:* Oceanview Large Residence Special Use District  
*Case Number:* 2018-013861PCA PCA [Board File No. 180939]  
*Initiated by:* Supervisor Safai / Introduced September 25, 2018  
Substituted April 30, 2019  
*Staff Contact:* Diego Sanchez, Legislative Affairs  
diego.sanchez@sfgov.org, 415-575-9082  
*Reviewed by:* Aaron D Starr, Manager of Legislative Affairs  
aaron.starr@sfgov.org, 415-558-6362

**RESOLUTION APPROVING A PROPOSED ORDINANCE THAT WOULD AMEND THE PLANNING CODE AND ZONING MAP TO CREATE THE OCEANVIEW LARGE RESIDENCE SPECIAL USE DISTRICT (THE AREA WITHIN A PERIMETER ESTABLISHED BY INTERSTATE 280, ORIZABA AVENUE, BROTHERHOOD WAY, JUNIPERO SERRA BOULEVARD, HOLLOWAY AVENUE, ASHTON AVENUE, OCEAN AVENUE, GENEVA AVENUE AND INTERSTATE 280) TO PROMOTE AND ENHANCE NEIGHBORHOOD CHARACTER AND AFFORDABILITY BY REQUIRING CONDITIONAL USE AUTHORIZATION FOR LARGE RESIDENTIAL DEVELOPMENTS IN THE DISTRICT; ADOPTING FINDINGS, INCLUDING ENVIRONMENTAL FINDINGS, PLANNING CODE SECTION 302 FINDINGS, AND FINDINGS OF CONSISTENCY WITH THE GENERAL PLAN AND PLANNING CODE SECTION 101.1.**

WHEREAS, on September 25, 2018 Supervisor Safai introduced a proposed Ordinance under Board of Supervisors (hereinafter "Board") File Number 180939, which would amend the Planning Code and Zoning Map to create the District 11 Large Residence Special Use District to promote and enhance neighborhood character and affordability by requiring Conditional Use authorization for large residential developments in the district;

WHEREAS, The Planning Commission (hereinafter "Commission") conducted a duly noticed public hearing at a regularly scheduled meeting to consider the proposed Ordinance on December 6, 2018; and,

WHEREAS, at the December 6, 2018 regularly scheduled meeting the Commission moved to continue the public hearing on the proposed Ordinance to March 7, 2019; and

WHEREAS, at the March 7, 2019 regularly scheduled meeting the Commission moved to continue the public hearing on the proposed Ordinance to April 11, 2019; and

WHEREAS, at the April 11, 2019 regularly scheduled meeting the Commission moved to continue the public hearing on the proposed Ordinance to April 25, 2019; and

WHEREAS, at the April 25, 2019 regularly scheduled meeting the Commission moved to continue the public hearing on the proposed Ordinance to May 9, 2019; and

WHEREAS, on April 30, 2019 a substitute Ordinance was introduced, changing the Ordinance title, Special Use District boundaries, Conditional Use authorization threshold and Conditional Use authorization considerations, among other changes; and

WHEREAS, at the May 9, 2019 regularly scheduled meeting the Commission moved to indefinitely continue the public hearing on the substitute Ordinance; and

WHEREAS, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting to consider the substitute Ordinance on June 13, 2019; and,

WHEREAS, the substitute Ordinance has been determined to be categorically exempt from environmental review under the California Environmental Quality Act Section 15060(c) and 15378; and

WHEREAS, the Planning Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of Department staff and other interested parties; and

WHEREAS, all pertinent documents may be found in the files of the Department, as the custodian of records, at 1650 Mission Street, Suite 400, San Francisco; and

WHEREAS, the Planning Commission has reviewed the substitute Ordinance; and

WHEREAS, the Planning Commission finds from the facts presented that the public necessity, convenience, and general welfare require the proposed amendment; and

MOVED, that the Planning Commission hereby **approves** the substitute ordinance.

## **FINDINGS**

Having reviewed the materials identified in the preamble above, and having heard all testimony and arguments, this Commission finds, concludes, and determines as follows:

1. Basing Special Use District boundaries on land use considerations, such as on proximity to post-secondary educational institutions, is much more appropriate than Supervisorial District boundaries. This avoids utilizing the factors for drawing Supervisorial Districts, such as the race of eligible voters to ensure compliance with the Voting Rights Act, in the establishment of Special Use District boundaries.

2. Using a metric such as Floor Area Ratio (FAR) to establish residential buildings size thresholds is beneficial as it considers existing site conditions. This is further enhanced when FAR thresholds are loosened to create incentives to maximize residential density.
3. The proposed Conditional Use authorization considerations facilitate implementation and realization of policy goals because they rely on quantifiable standards or require routine design review.
4. **General Plan Compliance.** The substitute Ordinance is consistent with the following Objectives and Policies of the General Plan:

## **URBAN DESIGN ELEMENT**

### **OBJECTIVE 1**

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

#### **Policy 1.3**

Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts.

*The proposed FAR threshold for residential building size in the substitute Ordinance will help steer new development into compatibility with the existing neighborhood character.*

### **OBJECTIVE 4**

IMPROVEMENT OF THE NEIGHBORHOOD ENVIRONMENT TO INCREASE PERSONAL SAFETY, COMFORT, PRIDE AND OPPORTUNITY.

#### **Policy 4.15**

Protect the livability and character of residential properties from the intrusion of incompatible new buildings.

*The Conditional Use findings and the FAR thresholds for residential buildings in the substitute Ordinance will help assure that new development is compatible with surrounding development. This contributes to the livability and character of residential neighborhoods in the proposed Special Use District.*

## **HOUSING ELEMENT**

### **OBJECTIVE 4**

FOSTER A HOUSING STOCK THAT MEETS THE NEEDS OF ALL RESIDENTS ACROSS LIFECYCLES.

#### **Policy 4.1**

Develop new housing, and encourage the remodeling of existing housing, for families with children.



**Policy 4.4**

Encourage sufficient and suitable rental housing opportunities, emphasizing permanently affordable rental units wherever possible.

*By incentivizing the maximization of residential density, the substitute Ordinance helps create new housing for families, including rental housing.*

5. **Planning Code Section 101 Findings.** The proposed amendments to the Planning Code are consistent with the eight Priority Policies set forth in Section 101.1(b) of the Planning Code in that:

1. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses enhanced;

*The substitute Ordinance would have a beneficial effect on neighborhood serving retail because it incentivizes creating additional residential units. These new residential units can house future patrons of the neighborhood-serving retail establishments.*

2. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods;

*The substitute Ordinance would have a beneficial effect on housing and neighborhood character because it imposes a new CU requirement for residential buildings that exceed a certain floor area ratio and includes as part of the CU a consideration on neighborhood compatibility.*

3. That the City's supply of affordable housing be preserved and enhanced;

*The substitute Ordinance would have a beneficial effect on the City's supply of affordable housing as it incentivizes the creation of new residential units, some of which may be affordable to a variety of households.*

4. That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking;

*The substitute Ordinance would have neither a positive nor negative effect on MUNI transit service, City streets or neighborhood parking because it concerns itself with imposing a new entitlement process on certain residential development.*

5. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced;

*The substitute Ordinance would not affect the future opportunities for resident employment or ownership in the industrial and service sector because it concerns itself with amending limitations on residential development.*

6. That the City achieve the greatest possible preparedness to protect against injury and loss of

life in an earthquake;

*The substitute Ordinance would not have an effect on the City's preparedness against injury and loss of life in an earthquake as it simply creates a new entitlement process for residential alterations and new construction.*

7. That the landmarks and historic buildings be preserved;

*The substitute Ordinance would have no effect on the City's Landmarks and historic buildings as it simply creates a new process for residential development that exceeds certain FAR thresholds.*

8. That our parks and open space and their access to sunlight and vistas be protected from development;

*The substitute Ordinance would have no positive or negative effect on the City's parks and open space and their access to sunlight and vistas because it concerns itself with imposing a new entitlement process on certain residential development.*

6. **Planning Code Section 302 Findings.** The Planning Commission finds from the facts presented that the public necessity, convenience and general welfare require the proposed amendments to the Planning Code as set forth in Section 302.

NOW THEREFORE BE IT RESOLVED that the Commission hereby APPROVES the substitute Ordinance as described in this Resolution.

I hereby certify that the foregoing Resolution was adopted by the Commission at its meeting on June 13, 2019.



Jonas P. Ionin  
Commission Secretary

AYES: Fung, Hillis, Johnson, Koppel, Melgar, Moore, Richards

NOES: None

ABSENT: None

ADOPTED: June 13, 2019



# SAN FRANCISCO PLANNING DEPARTMENT

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## Executive Summary Planning Code Text & Zoning Map Amendment

HEARING DATE: JUNE 13, 2019  
90-DAY DEADLINE: AUGUST 1, 2019

*Project Name:* Oceanview Large Residence Special Use District  
*Case Number:* 2018-013861MAP PCA [Board File No. 180939]  
*Initiated by:* Supervisor Safai / Introduced September 15, 2019;  
Substituted April 30, 2019  
*Staff Contact:* Diego Sanchez, Legislative Affairs  
diego.sanchez@sfgov.org, 415-575-9082  
*Reviewed by:* Aaron Starr, Manager of Legislative Affairs  
aaron.starr@sfgov.org, 415-558-6362  
*Recommendation:* **Approval with Modifications**

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### PLANNING CODE AMENDMENT

The proposed Ordinance would amend the Planning Code and Zoning Map to create the Oceanview Large Residence Special Use District (the area within a perimeter established by Interstate 280, Orizaba Avenue, Brotherhood Way, Junipero Serra Boulevard, Holloway Avenue, Ashton Avenue, Ocean Avenue, Geneva Avenue, and Interstate 280; *see map*) to promote and enhance neighborhoods character and affordability by requiring Conditional Use authorization for large residential developments in the district.

#### The Way It Is Now:

Projects that result in either (a) a Dwelling unit with five or more bedrooms, (b) a Dwelling unit less than 1/3 the size in floor area of the largest Dwelling unit in a multiple dwelling unit project, or (c) a Floor Area Ratio above a specified threshold do not require Conditional Use authorization solely because either of those three attributes.

#### The Way It Would Be:

Permit applications for Dwelling units that result either in (a) a Dwelling unit with five or more bedrooms, (b) a Dwelling unit less than 1/3 the size in floor area of the largest Dwelling unit in a multiple dwelling unit project, or (c) a Floor Area Ratio above the specified thresholds in the proposed Oceanview Large Residence Special Use District would require Conditional Use authorization.

### BACKGROUND

Planning Department Staff (Staff) understands the intention of the Ordinance as two-fold. As outlined in the Ordinance, the first intention is:



*“To protect and enhance existing neighborhood character, encourage new infill housing at compatible densities and scale, and provide for thorough assessment of proposed large-scale residences that could adversely impact the area and affordable housing opportunities...”*

Through dialogue with the legislative sponsor, Supervisor Safai, Staff understands the second intention is to prevent the use of single-family homes as dormitories or group housing. While this second intention is not identified in the Ordinance, the 278 Monticello case was mentioned as emblematic of the Supervisor’s concerns.

The 278 Monticello Case culminated on June 28, 2018 with the Planning Commission (Commission) taking Discretionary Review (DR) on a building permit application to legalize unpermitted alterations in conjunction with violations at that property.<sup>1</sup> The DR action was the conclusion of a Staff enforcement effort confirming that the Property had been illegally converted into a Group Housing use. The Commission’s DR action required the Property owner to reduce the number of proposed bedrooms from 10 to four and the number of proposed bathrooms from six to three and one-half. The Commission deemed the Property owner’s actions in creating a Group Housing use to be a public nuisance and therefore applied the additional restrictions.

Considering the Supervisor’s concerns, Staff reviewed the number of enforcement complaints related to illegal Dwelling Unit conversions to Group Housing. The Table below illustrates the findings from October 2018. While Supervisorial District 11 has the most complaints, Supervisorial Districts 3, 4 and 10 also had a similar number of complaints.

**ENFORCEMENT COMPLAINTS BY SUPERVISORIAL DISTRICT**

DISTRICT	No. of COMPLAINTS	PERCENTAGE
1	5	3%
2	11	7%
3	24	14%
4	22	13%
5	10	6%
6	10	6%
7	10	6%
8	12	7%
9	13	8%
10	25	15%
11	27	16%
TOTAL	169	

<sup>1</sup> Discretionary Review Action DRA-0596

On March 7, 2019 the Planning Commission (Commission) heard the original version of the Ordinance. This version included:

1. Special Use District boundaries encompassing the entirety of Supervisorial District 11; and
2. a Conditional Use authorization requirement for projects resulting in a Dwelling Unit exceeding 2,500 square feet in gross floor area or five or more bedrooms.

At the March 7 hearing the Commission expressed the following:

1. a preference for Dwelling Unit controls based on Floor Area Ratio (FAR);
2. a desire to see Conditional Use authorization findings that assure compatibility with surrounding development;
3. that enforcement remedies be pursued to address illegal Student Housing; and
4. suggested that the legislative sponsor work with Staff on these and other amendments.

After providing these comments, the Planning Commission moved unanimously to continue the hearing.

On April 30, 2019 the legislative sponsor substituted the original Ordinance with the version included in this Staff report.

## **ISSUES AND CONSIDERATIONS**

### **Recent Efforts to Limit Dwelling Unit Size**

There have been several initiatives to limit Dwelling Unit size in San Francisco. The Corona Heights Special Use District is one based on neighborhood boundaries. This SUD uses the proportional increase of a home's existing square footage and whether a new Dwelling Unit is added to regulate home sizes.<sup>2</sup> It also considers existing site conditions and encourages maximizing residential density. The substitute Ordinance has similar characteristics. It now targets a specific geography and bases land use controls on existing lot conditions, building size or added Dwelling Units.

Another was the Planning Department led Residential Expansion Threshold (RET), abandoned in 2017 due to significant opposition. RET sought to limit the size of Dwelling Units based on Floor Area Ratio (FAR). It also encouraged increasing density by providing more FAR to projects maximizing their allowable residential density. The substitute Ordinance also uses FAR to control Dwelling Unit size and offers additional area for added residential density, including for adding Accessory Dwelling Units.

### **Special Use District (SUD) Boundaries**

The basis for selecting SUD boundaries is quite different than that for supervisorial districts. In drawing supervisorial district boundaries, the City is legally required to consider the race of the eligible voters in each district to ensure compliance with the Voting Rights Act. Drawing SUD boundaries to limit home sizes, for example, that mimic supervisorial district boundaries would be inappropriate. Instead SUD boundaries should be based on factors such as proximity to existing land uses, neighborhood topography, or presence of cultural and architectural resources. The substitute Ordinance is proposing SUD boundaries that encompass specific neighborhoods, including Oceanview, Ingelside and Merced Heights. These neighborhoods either border or are near San Francisco State University and City College of San Francisco, two prominent post-secondary educational institutions.

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<sup>2</sup> Planning Code Section 249.77

### **Proposed Additional Conditional Use Considerations**

The proposed Conditional Use (CU) authorization requirements in the Ordinance require the Planning Commission to consider whether a project establishes at least two of the following:

- The proposed project maximizes allowed density, including allowed Accessory Dwelling Units;
- The proposed project is compatible with surrounding development in terms of floor area, building scale, and form;
- If the proposed project results in five or more bedrooms in any dwelling unit, no dwelling unit contains more than three bathrooms;
- The proposed project does not add new off-street parking areas.

These findings are easily implemented as each is either quantifiable or otherwise routinely discerned from plan review. These findings also meet various City policies and goals, including encouraging the production of new housing stock, preserving neighborhood character, and promoting the transit-first policy in the City's Charter.

### **Regulating Dwelling Units: Definition, and Allowed Locations, Sizes, and Users**

#### Definition of a Dwelling Unit

Planning Code Section 102 defines a Dwelling Unit as a Residential Use designed for, or occupied by, one family doing its own cooking and having only one kitchen. This Residential Use is the most common type in San Francisco. It is found in single-family homes and multifamily buildings throughout the City.

#### Dwelling Unit Permissibility and Size in RH Zoning Districts

In RH districts, the number of Dwelling Units permitted per lot is generally limited by a fixed density. For instance, an RH-2 zoning district allows two units per lot, and an RH-3 zoning district allows three units per lot. The size of a building in an RH Zoning District is limited by height and setback controls, and not based on FAR. The Department also applies applicable design guidelines, including the Residential Design Guidelines, to regulate building scale and form and architectural details.<sup>3</sup>

Except for limiting the number of kitchens to one per unit, the Planning Code does not regulate the interior layout of Dwelling Units in RH districts. Similarly, the Residential Design Guidelines do not regulate a building's interior layout, the one exception being the layout of the garage. During permit review, Staff does make suggestions on floor plan layouts, but has limited purview over interior features, including on the number of bedrooms.

#### Allowed Users of Dwelling Units

The Planning Code does not prohibit the renting of rooms in a Dwelling Unit. A family of any size may share a Dwelling Unit with three unrelated housemates. The Planning Code also allows a group of five or more unrelated persons to occupy a Dwelling Unit. To do so, this group of unrelated persons must demonstrate that they (a) have control over their composition, (b) prepare and consume their meals collectively, and (c) determines its own rules and utilization of the residential space.<sup>4</sup> Further, the

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<sup>3</sup> Planning Code Section 209.1, Table 209.1; Planning Code Section 311(c)(1)

<sup>4</sup> Definition of Family, Planning Code Section 102

Planning Code allows any Residential Use, including Dwelling Units, to house students. Taken together, Staff lacks free rein to regulate the users of a Dwelling Unit, and the associated number of bedrooms.

### **Implementing Bedroom Count Thresholds**

Regulating the number of bedrooms in a Dwelling Unit is difficult. During permit review an applicant may misrepresent a bedroom in several ways, including labeling it as storage, a home entertainment room, or an accessory home office. The Department cannot prohibit the use of residential space for any of these purposes. An applicant may also propose large bedrooms with intention of dividing them after permit issuance, increasing the number of bedrooms from what was approved by Planning. In these ways an applicant may circumvent thresholds on allowed bedrooms.

It is also important to note that the use of rooms in a dwelling may change over time. As a family grows or in-laws move in, a dining room, for example, is often converted to a bedroom. The Department has no way of regulating this unless the property owner seeks an administrative permit to update the recorded bedroom count. When this conversion results in a bedroom count that requires CU, it may be overly optimistic to assume property owners will consistently come forth to do so.

### **Enforcement of the Use of Dwelling Units**

Assuring that Dwelling Units are not used for unauthorized or prohibited uses is handled through the enforcement process. This includes illegally using Dwelling Units as Group Housing. The Planning Department's enforcement division actively responds to complaints about alleged misuse of Dwelling Units through site visits and communication with property owners and occupants. The Department's enforcement staff may also collaborate with staff from other City agencies. This occurs when complaints about the use of Dwelling Units involves specific quality of life issues. For example, loud music, overcrowding, and excessive number of pets are typically dealt with through other codes, including the Police, Housing or Public Health Codes.

It is also important to note that the occupants of any Dwelling Unit, including the sole occupant of a single-family home, may create a public nuisance. The Department is unaware of a direct link between the number of building occupants and a decrease in quality of life. In fact, San Francisco is home to many desirable, residentially dense neighborhoods replete with multifamily buildings.

### **General Plan Compliance**

The substitute Ordinance and proposed modifications are, on balance, in harmony with the Objectives and Policies of the General Plan. The FAR thresholds and CU findings will help steer residential development into compatibility with surrounding buildings, in alignment with the Urban Design Element. The incentives to add residential units as part of developing buildings with larger FAR helps create add to the City's residential housing stock, including its family and rental housing stock, in alignment with the Housing Element.

### **Implementation**

For the reasons stated above., the Department finds that the bedroom limitation in the proposed Ordinance will be difficult to implement and potentially unenforceable.

## **RECOMMENDATION**

The Department recommends that the Commission *approve with modification* the proposed Ordinance and adopt the attached Draft Resolution to that effect.

The proposed modification is to eliminate the bedroom count limits and instead explore creating a robust inter-departmental enforcement program to address public nuisance complaints within the boundaries of the proposed SUD.

## **BASIS FOR RECOMMENDATION**

The Department is in general support of the substitute Ordinance. The amended SUD boundaries are based on a land use rationale, instead of supervisorial districts. Basing dwelling unit size thresholds on FAR considers existing site conditions and, as proposed, incentivizes maximizing residential density. The CU findings in the substitute Ordinance are now much easier to implement, as they are based on quantifiable measures or routine design review. Yet, despite the changes in the substitute Ordinance, the Department maintains strong concerns about the proposed bedroom count regulation.

**Recommendation 1: Eliminate the bedroom count limit and instead explore creating a robust inter-departmental enforcement program to address public nuisance complaints within the boundaries of the proposed SUD.** Bedroom count regulations are easily circumvented by mislabeling bedrooms during Planning Department plan review. This fact renders them ineffective. Within existing homes, limits on bedroom counts fail to recognize how residential spaces are used in a space-constrained city like San Francisco. Over time the use of rooms changes according to need. Requiring homeowners to obtain CU should they exceed the bedrooms count threshold is unnecessarily burdensome, especially for a single room conversion. It is also overly optimistic to expect homeowners to consistently come forth and seek CU for this type of project. Further, there is no absolute link between bedroom count and an increase in public nuisance. Unruly occupants in any sized residence can easily create a public nuisance. Conversely, it is possible that a multi-generational household in a multi-bedroom Dwelling Unit become an asset to a neighborhood. Maintaining quality of life in a neighborhood often requires enforcing the City's other Municipal and Building Codes. In this light, exploring the creation of a robust inter-agency effort to address public nuisance within the SUD is a preferred option.

## **REQUIRED COMMISSION ACTION**

The proposed Ordinance is before the Commission so that it may approve it, reject it, or approve it with modifications.

## **ENVIRONMENTAL REVIEW**

The proposed amendments are not defined as a project under CEQA Guidelines Section 15060(c) and 15378 because they do not result in a physical change in the environment.

## **PUBLIC COMMENT**

As of the date of this report, the Planning Department has received dozens of telephone calls enquiring about the proposed Ordinance and three letters. Most telephone calls sought clarification about the proposed Ordinance's effect on existing housing. Telephone calls in support applauded the intention to reduce the size and intensity of use of residences in Supervisorial District 11. Telephone calls in opposition expressed concern about the proposed Ordinance's effect on rental housing production and of potential infringement on property rights. A common theme of the two letters in opposition is the need for nuanced controls on residential property that encourage density and do not aggravate the current housing shortage. A third letter calls for increased review of increasing density and renovations on neighborhood character and quality of life



**Attachments:**

- Exhibit A: Draft Planning Commission Resolution
- Exhibit B: Map of Oceanview Special Use District boundaries
- Exhibit C: Letters of Opposition to Original Ordinance
- Exhibit D: Board of Supervisors File No. 180939