FILE NO. 251190

Petitions and Communications received from November 25, 2025, through December 4, 2025, for reference by the President to Committee considering related matters, or to be ordered filed by the Clerk on December 9, 2025.

Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information will not be redacted.

From the Office of the Mayor, (MYR), pursuant Charter, Section 13.101.5(a), submitting the appointment of Alan Wong as the District 4 Supervisor. Copy: Each Supervisor. (1)

From the Office of the Mayor (MYR), regarding the proposed Resolution authorizing a six-month waiver of the City's Behested Payments Ordinance for the Mayor, members of the Mayor's Office, and the Executive Director of the Office of Economic and Workforce Development to solicit donations from nonprofits, private organizations, grantmakers, foundations, and other persons and entities for the purpose of supporting the continued economic revitalization of San Francisco, pursuant to Section 3.620(f) of the Campaign and Governmental Conduct Code. File No. 251083. Copy: Each Supervisor. (2)

From the Office of the City Administrator (ADM), Capital Planning Committee (CPC), pursuant to Administrative Code, Section 3.21, submitting approved action items and recommendations from December 1, 2025, to be considered by the Board of Supervisors. Copy: Each Supervisor. (3)

From the Department of Public Works (DPW), pursuant to Ordinance No. 15-25, submitting the 2025 Commercial Vacancy Tax Exemption Annual Report. Copy: Each Supervisor. (4)

From the San Francisco Arts Commission (ART), submitting the Full Arts Commission's meeting agenda for December 1, 2025, and Nominating Committee meeting agenda for December 8, 2025. Copy: Each Supervisor. (5)

From the Planning Department (CPC), submitting a response to a letter of inquiry issued by Supervisor Bilal Mahmood at the October 28, 2025, Board of Supervisors meeting. Copy: Each Supervisor. (6)

From the San Francisco Unified School District (SFUSD), submitting a response to a letter of inquiry issued by Supervisors Chyanne Chen and Bilal Mahmood at the October 28, 2025, Board of Supervisors meeting. Copy: Each Supervisor. (7)

From the Environment Department (ENV), pursuant to Environment Code, Chapter 2, Section 203(g), submitting the Municipal Buy Green 2024 Annual Report. Copy: Each Supervisor. (8)

From the Office of the Controller (CON), submitting the results of Refunding Certificates of Participation (COPs), Series 2025-R2 and 2025-R3. Copy: Each Supervisor. (9)

From the San Francisco Public Utilities Commission (SFPUC), pursuant to Resolution No. 227-18, submitting the Status of Applications to Pacific Gas & Electric Company (PG&E) for Electric Service Quarterly Report from September to November 2025. Copy: Each Supervisor. (10)

From the Ethics Commission (ETH), submitting a notice of proposed regulation amendments regarding the required timeline for considering post-employment and compensated advocacy waivers. Copy: Each Supervisor. (11)

From the Department of Elections (REG), submitting certification of the results of votes cast in San Francsico for the November 4, 2025, Statewide Special Election. Copy: Each Supervisor. (12)

From various departments, pursuant to Administrative Code, Section 12B.5-1(d)(1), submitting approved Chapter 12B Waiver Request Forms. 3 Forms. Copy: Each Supervisor. (13)

From the Department of Public Health (DPH), pursuant to Ordinance No. 10-25, submitting Administrative Code, Chapter 21B, waiver notification. Copy: Each Supervisor. (14)

From the California Department of Parks and Recreation, submitting nomination notice to add Kinmon Gakuen to the National Register of Historic Places. Copy: Each Supervisor. (15)

From Alan Wong, submitting communications resigning form the City College Board of Trustees and Children's Council of San Francisco. 2 Communications. Copy: Each Supervisor. (16)

From Kylie Orman and Alyssa Brady, regarding Jessica's Law. Copy: Each Supervisor. (17)

From Judy Gorski, regarding safety in District 4 and Sunset Dunes/Upper Great Highway. Copy: Each Supervisor. (18)

From Jordan Wasilewski, regarding permanent supportive housing. Copy: Each Supervisor. (19)

From Paul N. Dohrmann, regarding the Western Potable Emergency Firefighting Water System. Copy: Each Supervisor. (20)

From Anthony Bishopric, regarding bike lanes on Market Street. Copy: Each Supervisor. (21)

From Jacob Horowitz, regarding the Hearing to address concerns raised by community members of neglect, abuse, and civil rights violations at the Taylor Street Facility located at 111 Taylor Street, operated by the GEO Group, Inc.; and requesting the GEO Group, Inc., Office of the Public Defender, Adult Probation Department, and California Department of Corrections and Rehabilitation to report. File No. 250792. Copy: Each Supervisor. (22)

From Yesenia Lacayo, regarding the proposed Ordinance appropriating $3,500,000 from the General Reserve to the Mayor's Office of Housing and Community Development to expand access to existing coordinated services for immigration legal defense and community response services to the immigrant community in Fiscal Year (FY) 2025-2026. File No. 251080. Copy: Each Supervisor. (23)

From Maggie Hallahan, regarding the California Water Resources Control Board. Copy: Each Supervisor. (24)

From Aaron Goodman, regarding the 19th Avenue repaving project. Copy: Each Supervisor. (25)

From the Alliance for a Better District 6, regarding a project at 120 Stockton Street. Copy: Each Supervisor. (26)

From Greg Pauxtis M.D., regarding John F. Kennedy Drive. Copy: Each Supervisor. (27)

From Randy Shaw, regarding the Commission Streamlining Task Force. Copy: Each Supervisor. (28)

From Adrienne Hoyer, regarding sex workers in the Mission. Copy: Each Supervisor. (29)

From a member of the public, regarding the Ordinance amending the Public Works Code to require the Department of Public Works to plant replacement Street Trees within 120 days of removal, require that Street Trees removed without a permit be replaced by Street Trees of equal size, require that Tree protection plans include the applicant's acknowledgement of potential Tree replacement costs, and set maximum administrative penalties for removing or injuring Street Trees; and affirming the Planning Department's determination under the California Environmental Quality Act. File No. 250836; Ordinance No. 1-22. Copy: Each Supervisor. (30)

From a member of the public, regarding Labor and Employment Code, Article 21: San Francisco Health Care Security Ordinance. Copy: Each Supervisor. (31)

From the Planning Association for the Richmond (PAR), regarding concerts in Golden Gate Park. Copy: Each Supervisor. (32)

From members of the public, regarding Sunset Dunes. 2 Letters. Copy: Each Supervisor. (33)

From members of the public, regarding automatic sprinkler systems in existing high-rise buildings. 50 Letters. Copy: Each Supervisor. (34)

From members of the public, regarding lobbying activity in San Francisco government. 5 Letters. Copy: Each Supervisor. (35)

From members of the public, regarding banning plastic cigarette filters. 7 Letters. Copy: Each Supervisor. (36)

From members of the public, regarding vehicles on Market Street. 9 Letters. Copy: Each Supervisor. (37)

From members of the public, regarding public transit funding. 93 Letters. Copy: Each Supervisor. (38)

From Sullivan, regarding behested payments. Copy: Each Supervisor. (39)

From Sean Feeney, regarding the Vaillancourt Fountain in Embarcadero Plaza (formerly Justin Herman Plaza). Copy: Each Supervisor. (40)

From members of the public, regarding the proposed Ordinance amending the Business and Tax Regulations Code to repeal the cannabis business tax beginning on January 1, 2026, and remove references to the cannabis business tax from the common administrative provisions of the Code. File No. 250929. 12 Letters. Copy: Each Supervisor. (41)

From members of the public, regarding the Hearing of persons interested in or objecting to the approval of a Conditional Use Authorization pursuant to Planning Code, Sections 209.2, 303, and 304 for a proposed project at 350 Amber Drive (Assessor's Parcel Block No. 7521, Lot No. 005) identified in Planning Case No. 2024-004318CUA, issued by the Planning Commission by Motion No. 21825, dated September 25, 2025, to install a new AT&T Macro Wireless Telecommunications Facility on an approximately 104 foot tall monopole, consisting of 12 new antennas, and nine new remote radio units and ancillary equipment within the P (Public) Zoning District and OS Height and Bulk District. (District 8) (Appellant: Mitchell M. Tsai of Mitchell M. Tsai Law Firm on behalf of the Diamond Heights Community Association) (Filed October 27, 2025). File No. 251098. 9 Letters. Copy: Each Supervisor. (42)

From members of the public, regarding the proposed Ordinances: General Plan Amendments - Family Zoning Plan; Zoning Map - Family Zoning Plan; Planning, Business and Tax Regulations Codes - Family Zoning Plan; and Planning, Business and Tax Regulations Codes - Family Zoning Plan. File Nos. 250966, 250700, 250701, and 251072. 16 Letters. Copy: Each Supervisor. (43)

OFFICE OF THE MAYOR
SAN FRANCISCO

DANIEL LURIE
MAYOR

December 1, 2025

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

Dear Madam Clerk:

On November 13, 2025, Isabella "Beya" Alcaraz vacated the Office of District 4 Supervisor.

Pursuant to San Francisco Charter Section 13.101.5(a), I hereby appoint Alan Wong to the vacant seat on the Board of Supervisors formerly held by Isabella "Beya" Alcaraz. Alan Wong will assume office effective December 1, 2025, immediately upon taking the Oath of Office.

Sincerely,

Daniel Lurie
Mayor
City and County of San Francisco

cc: John Arntz, Director, Department of Elections
David Chiu, City Attorney
Patrick Ford, Executive Director, Ethics Commission
Diane Rea, County Clerk

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Crayton, Monique (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: File No: 251083 [Behested Payment Waiver - Economic Revitalization Efforts] |
| **Date:** | Wednesday, December 3, 2025 12:15:34 PM |
| **Attachments:** | File No 251083 -- Behested Payment Waiver - Economic Revitalization Efforts Memo 12_2_25.pdf |

Hello,

Please see attached memo form the Office of the Mayor (MYR), regarding **File No. 251083:**

Resolution authorizing a six-month waiver of the City's Behested Payments Ordinance for the Mayor, members of the Mayor's Office, and the Executive Director of the Office of Economic and Workforce Development to solicit donations from nonprofits, private organizations, grantmakers, foundations, and other persons and entities for the purpose of supporting the continued economic revitalization of San Francisco, pursuant to Section 3.620(f) of the Campaign and Governmental Conduct Code.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

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**From:** Thongsavat, Adam (MYR) <adam.thongsavat@sfgov.org>
**Sent:** Tuesday, December 2, 2025 2:13 PM
**To:** BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Subject:** File No: 251083 [Behested Payment Waiver - Economic Revitalization Efforts]

Dear Clerks,

Can we please add this memo to File No: 251083 [Behested Payment Waiver - Economic Revitalization Efforts]

Thank you!

Adam

Adam Thongsavat
Liaison to the Board of Supervisors
Office of Mayor Daniel Lurie

OFFICE OF THE MAYOR
SAN FRANCISCO

DANIEL LURIE
MAYOR

TO: President Mandelman and Members of the Board of Supervisors
FROM: Adam Thongsavat, Mayor's Liaison to the Board of Supervisors
RE: File No: 251083 [Behested Payment Waiver - Economic Revitalization Efforts]
DATE: December 2, 2025

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Downtown is San Francisco's front door to the world, the Bay Area's primary transit nexus, and our economic engine. When downtown thrives, it powers our city's services and employs San Franciscans from every neighborhood. Downtown has historically accounted for more than 40% of the city's resident employment, tax revenue, and number of small businesses. Its world-renowned cultural institutions, iconic destinations, and innovation ecosystem attract visitors from across the region and globe.

San Francisco and its downtown area have faced unprecedented challenges resulting in part from the Covid-19 pandemic, including a decline in tourism, the closure of businesses, a rise in homelessness, an increased number of residents living in or near poverty, a lack of affordable housing, and residents relocating out of the City. More resources are urgently needed to support downtown's evolution into a live, work, play destination, accelerate downtown's recovery as the city's economic engine, and promote greater prosperity and opportunity for all San Franciscans.

This urgent need led the Mayor's Office to pursue and secure a waiver of the Behested Payments Ordinance under Section 3.620(f) in June 2025. The waiver has enabled the Mayor's Office and OEWD to coordinate with organizations like the San Francisco Downtown Development Corporation, a public benefit corporation that is raising funds to revitalize San Francisco and specifically its downtown area. Through these efforts, more than $50 million has been pledged to support downtown revitalization, with $6.2 million already secured. Funds raised through the existing waiver have supported several key initiatives, including:

- The Market Street Safety program, which has placed ambassadors at Embarcadero and Montgomery BART station exits as commuters return to work.
- Power washing the convention corridor near Moscone (4th Street from Market to Howard, and Mission Street from 3rd to 5th).
- Attracting tens of thousands of visitors to exciting large events like Downtown First Thursdays and upcoming holiday events Winter Walk and Let's Glow that increase foot traffic to our local businesses.

The staff covered under this waiver may participate in conversations with potential funders to continue this revitalization effort. Together, we will ensure that downtown is a safe, clean, dynamic, economically vibrant, innovative, and inviting place for residents, visitors, and businesses alike.

**Engagement with Potential Interested Parties**

Businesses, foundations, property owners, and other private employers and parties could be solicited under this waiver. These parties are increasingly recognizing how vital downtown's success is — not only for their own operations and employees, but for the broader economic prosperity of San Francisco. We are pursuing a behested payments waiver out of an abundance of caution since some of the types of parties named above (especially businesses or property owners) could have business before the City.

The Mayor's Office and OEWD staff covered under the previous waiver has engaged with the following entities that may be considered interested parties:

- The Conway Family Foundation

- The Resiliency Fund
- Ripple Labs Inc.
- Lior Susan
- Shorenstein Realty Services LP
- Charles and Helen Schwab Foundation
- Mimi & Peter Hass Fund
- Charles Schwab and Co Inc.
- Spero Charitable Fund
- Chen Family Fund

As stated in the resolution in terms substantially similar to the existing waiver, we will offer a report that identifies donors and their interested party relationship, if any, within 60 days of the waiver's expiration.

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | CPC BOS Memo 25.12.01 |
| **Date:** | Tuesday, December 2, 2025 10:57:06 AM |
| **Attachments:** | CPC BOS Memo 2025-12-01 with CC signature.pdf |

Hello,

Please see attached, submitted by the Capital Planning Committee (CPC), December 1, 2025 approved action item and recommendation(s) to be considered by the Board of Supervisors, in accordance with Administrative Code, Section 3.21.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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City & County of San Francisco
Daniel Lurie, Mayor

Office of the City Administrator
Carmen Chu, City Administrator
Brian Strong, Chief Resilience Officer
Office of Resilience & Capital Planning

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2025 DEC 02 AM10:47

# MEMORANDUM

December 1, 2025

**To:** Members of the Board of Supervisors

**From:** Carmen Chu, City Administrator & Capital Planning Committee Chair

**Copy:** Angela Calvillo, Clerk of the Board
Capital Planning Committee

**Regarding:** (1) Proposed 2026 Earthquake Safety and Emergency Response (ESER) General Obligation (G.O.) Bond
(2) Capital Plan and Administrative Code Section 3.20 Amendments
(3) Annual Infrastructure Construction Cost Inflation Estimate (AICCIE)

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In accordance with Section 3.21 of the Administrative Code, on December 1, 2025, the Capital Planning Committee (CPC) approved the following action item to be considered by the Board of Supervisors. The CPC's recommendation is set forth below.

| | |
|---|---|
| **1. Board File Number:** | **Approval of (1) the Resolution of Public Interest and Necessity authorizing the proposed 2026 Earthquake Safety and Emergency Response (ESER) General Obligation (G.O.) Bond in the amount of $535,000,000, and (2) Ordinance calling special election to authorize the incurrence of bonded indebtedness entitled 2026 Earthquake Safety and Emergency Response (ESER) General Obligation (G.O.) Bond in the amount of $535,000,000** |
| CPC Recommendation: | The CPC recommends approval of both the Resolution and the Ordinance related to the 2026 ESER Bond. |
| Comments: | The CPC approves this item by a vote of 9-0. |
| | Committee members or representatives in favor: |
| | Carmen Chu, City Administrator; Sophia Kittler, Mayor's Budget Director; Bruce Robertson, Public Works; Greg Wagner, Controller; Mike Martin, Port of San Francisco; |

| | |
|---|---|
| | Stephen Robinson, Public Utilities Commission; Stacy Bradley, Recreation and Parks Department; Julie Kirschbaum, Director, SFMTA; Mike Nakornkhet, Director, San Francisco International Airport. |
| **2. Board File Number:** | **Approval of the FY2026-2035 Capital Plan and Administrative Code Section 3.20 Amendments** |
| CPC Recommendation: | The CPC recommends approval of both the proposed Resolution amending the G.O. Bond Program schedule from the FY2026-2035 Capital Plan and the proposed Ordinance to amend Administrative Code Section 3.20, to change the reporting requirement for Capital Expenditure Plans to even years from odd years, beginning in 2028. |
| Comments: | The CPC approves this item by a vote of 10-0. |
| | Committee members or representatives in favor: |
| | Carmen Chu, City Administrator; Sophia Kittler, Mayor's Budget Director; Bruce Robertson, Public Works; Greg Wagner, Controller; Sarah Dennis-Phillips, Director, SF Planning; Mike Martin, Port of San Francisco; Stephen Robinson, Public Utilities Commission; Stacy Bradley, Recreation and Parks Department; Julie Kirschbaum, Director, SFMTA; Mike Nakornkhet, Director, San Francisco International Airport. |
| **3. CPC Action Item:** | **Approval of the Annual Infrastructure Construction Cost Inflation Estimate (AICCIE) for Calendar Year 2026. A copy of the analysis is available under the December 1st CPC meeting at https://onesanfrancisco.org/CPC-committee-meetings** |
| Action: | The CPC approves adoption of AICCIE at 4.5% for CY 2026. |
| Comments: | The CPC approves this item by a vote of 10-0. |
| | Committee members or representatives in favor: |
| | Rachel Cukierman, City Administrator's Office; Tiffany Young, Mayor's Budget Office; Bruce Robertson, Public Works; Greg Wagner, Controller; Sarah Dennis-Phillips, Director, SF Planning; Mike Martin, Port of San Francisco; Stephen Robinson, Public Utilities Commission; Stacy Bradley, Recreation and Parks Department; Julie Kirschbaum, Director, SFMTA; Mike Nakornkhet, Director, San Francisco International Airport. |

item 4

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Commercial Vacancy Tax Exemption: Public Infrastructure Projects Annual Report - Due December 1, 2025 |
| **Date:** | Wednesday, November 26, 2025 2:42:41 PM |
| **Attachments:** | 2025 CVT Exemption Annual Report to BOS - Public Works.docx.pdf<br>image002.png |

Hello,

Please see attached and below communication from the Department of Public Works (DPW), pursuant to Ordinance No. 15-25, submitting the 2025 Commercial Vacancy Tax Exemption Annual Report.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Sent:** Wednesday, November 26, 2025 10:54 AM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Cc:** BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Subject:** FW: Commercial Vacancy Tax Exemption: Public Infrastructure Projects Annual Report - Due December 1, 2025

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**From:** Schneider, Ian (DPW) <ian.schneider@sfdpw.org>
**Sent:** Wednesday, November 26, 2025 10:53 AM

**To:** Salehbhai, Hafiza (TTX) <hafiza.salehbhai@sfgov.org>; Fried, Amanda (TTX) <amanda.fried@sfgov.org>; Manke, Eric (TTX) <eric.manke@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Cc:** Short, Carla (DPW) <Carla.Short@sfdpw.org>; Degrafinried, Alaric (DPW) <Alaric.Degrafinried@sfdpw.org>; Marquez, Jennifer (DPW) <jennifer.marquez@sfdpw.org>
**Subject:** RE: Commercial Vacancy Tax Exemption: Public Infrastructure Projects Annual Report - Due December 1, 2025

Hello,
Pursuant to the Commercial Vacancy Tax Exemption Ordinance passed on February 14, 2025, San Francisco Public Works hereby submits its annual report of Major Public Infrastructure or Construction Projects in 2025 that meet the criteria under the ordinance. Please see attached report, and contact me if you have any further questions.
Thank you,

Ian Schneider (he/him)
Government Affairs Manager

San Francisco Public Works | City and County of San Francisco
49 S. Van Ness Ave, Suite 1600 | San Francisco, CA 94103
(628) 271-3126 | sfpublicworks.org

Note: I will be out of office December 22 through January 5.

---

**From:** Salehbhai, Hafiza (TTX) <hafiza.salehbhai@sfgov.org>
**Sent:** Wednesday, October 1, 2025 8:44 AM
**To:** Spitz, Jeremy (PUC) <JSpitz@sfwater.org>; Martinsen, Janet (MTA) <Janet.Martinsen@sfmta.com>; Ramos, Joel (MTA) <Joel.Ramos@sfmta.com>; Schneider, Ian (DPW) <ian.schneider@sfdpw.org>; aidin.sarabi@sfmta.com
**Cc:** Fried, Amanda (TTX) <amanda.fried@sfgov.org>; Manke, Eric (TTX) <eric.manke@sfgov.org>
**Subject:** Commercial Vacancy Tax Exemption: Public Infrastructure Projects Annual Report - Due December 1, 2025

Good morning,

On February 14, 2025, the Board of Supervisors passed the Commercial Vacancy Tax Exemption ordinance, which provides a Commercial Vacancy Tax exemption for businesses impacted by *Public Right of Way Construction Periods*.

Under this ordinance, the Department of Public Works (DPW), Public Utilities Commission (PUC), and Municipal Transportation Agency (MTA) must submit a report to

the Treasurer & Tax Collector (TTX) and Board of Supervisors (BOS) no later than December 1, 2025. The report must list all Major Public Infrastructure or Construction Projects in 2025 that:

- Already exceeded 180 days of construction in a Named Neighborhood Commercial District or Named Neighborhood Commercial Transit District, or
- Are projected to exceed 180 days of construction by December 31, 2025.

TTX will then exempt all taxable commercial space in the affected districts ("Temporarily Excluded Districts") from the Commercial Vacancy Tax for that year.

For reference, a Major Public Infrastructure or Construction Project means a project by DPW, PUC, or MTA that disrupts access to commercial storefronts in a Named Neighborhood Commercial District or Named Neighborhood Commercial Transit District, for more than 180 days in a calendar year.

**What you need to do:**

Please use the attached Annual Report template to submit your report to TTX and BOS by December 1, 2025. The attached template also includes a schedule to provide project details including project name, address, and applicable districts.

Use the Project Address to identify the applicable Named Neighborhood Commercial District or the Named Neighborhood Commercial Transit District. A map of the district is available on this page under "Step 1." Click on the magnifying glass to enter the Project Address and identify the Named District.

Thank you for your attention to this requirement. Please don't hesitate to reach out with any questions.

Hafiza Salehbhai
*Policy and Communications*
Office of the Treasurer & Tax Collector
Office: 415.554.4786
San Francisco only, **call 311**

**sftreasurer.org**

Docusign Envelope ID: 738ED1B4-5B8C-4CCF-B161-FC57E451DC0A

**Alaric Degrafinried, Deputy Director of Strategic Initiatives** | Director's Office
alaric.degrafinried@sfdpw.org | T. 628.271.3170 | 49 South Van Ness Ave. Suite 1600, San Francisco, CA 94103

December 1, 2025

To: Angela Calvillo
Clerk of the Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102

cc: José Cisneros, Treasurer & Tax Collector

From: Alaric Degrafinried, Deputy Director of Support Services, San Francisco Public Works

Re: Annual Report to the Board of Supervisors – 2025 Commercial Vacancy Tax Exemption (Public Right of Way Construction Periods)

Dear Ms. Calvillo:

Pursuant to the Commercial Vacancy Tax Exemption Ordinance passed on February 14, 2025, San Francisco Public Works hereby submits its annual report of Major Public Infrastructure or Construction Projects in 2025 that meet the criteria under the ordinance.

This report lists projects that:

- Already exceeded 180 days of construction in a Named Neighborhood Commercial District or Named Neighborhood Commercial Transit District; or
- Are projected to exceed 180 days of construction by December 31, 2025.

For the 2025 calendar year, Public Works had 19 Major Public Infrastructure or Construction Projects impacting 26 unique NCDs or NCTDs that met this criteria.

The attached schedule provides project details including project name, representative address, and applicable district(s).

If you have any questions regarding this report, please contact Ian Schneider, Government Affairs Manager, at ian.schneider@sfdpw.org.

Sincerely,

Signed by:
Alaric Degrafinried
A1A7D8C8B4F0DA...

Alaric Degrafinried
Deputy Director of Support Services
San Francisco Public Works

Docusign Envelope ID: 738ED1B4-5B8C-4CCF-B161-FC57E451DC0A

## Schedule A – Qualifying Major Public Infrastructure or Construction Projects (2025)

| Department | Year | Project Name | Project Address | Project District(s) |
|---|---|---|---|---|
| DPW | 2025 | MISSION STREET AND GENEVA AVENUE IMPROVEMENT PROJECT | Mission St and Geneva Ave | EXCELSIOR OUTER MISSION STREET NEIGHBORHOOD |
| DPW | 2025 | Western Addition Area Traffic Signal Upgrades: Phase 1 | Fillmore St and Golden Gate Ave | FILLMORE STREET NEIGHBORHOOD COMMERCIAL TRANSIT |
| DPW | 2025 | Castro Station Elevator | Castro St and Market St | CASTRO STREET NEIGHBORHOOD COMMERCIAL |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Filbert St and Columbus Ave | NORTH BEACH NEIGHBORHOOD COMMERCIAL |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Polk St and Vallejo St | POLK STREET NEIGHBORHOOD COMMERCIAL |

Docusign Envelope ID: 738ED1B4-5B8C-4CCF-B161-FC57E451DC0A

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| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Divisadero and Ellis St | DIVISADERO STREET NEIGHBORHOOD COMMERCIAL TRANSIT |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Geary Blvd and 7th Ave | GEARY BOULEVARD NEIGHBORHOOD COMMERCIAL DISTRICT |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Clement St and 22nd Ave | OUTER CLEMENT STREET NEIGHBORHOOD COMMERCIAL |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Noriega St and 32nd Ave | NORIEGA STREET NEIGHBORHOOD COMMERCIAL DISTRICT |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS- | Ocean Ave and Lakewood Ave | OCEAN AVENUE NEIGHBORHOOD COMMERCIAL TRANSIT |

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| | | NEEDED CONTRACT G23) | | |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Mission St and Mount Vernon Ave | EXCELSIOR OUTER MISSION STREET NEIGHBORHOOD |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Cortland Ave and Ellsworth St | CORTLAND AVENUE NEIGHBORHOOD COMMERCIAL DISTRICT |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | 24th St and Alabama St | 24TH-MISSION NEIGHBORHOOD COMMERCIAL TRANSIT |
| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Valencia St and 19th St | VALENCIA STREET NEIGHBORHOOD COMMERCIAL TRANSIT |

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| DPW | 2025 | AS-NEEDED CITYWIDE PAVEMENT PRESERVATION CONTRACT 5 (GENERAL AS-NEEDED CONTRACT G23) | Folsom St and Russ St | SOMA NEIGHBORHOOD COMMERCIAL TRANSIT |
| DPW | 2025 | Various Locations Pavement Renovation No.60 and Sewer Replacement | Presidio Ave and Sacramento St | SACRAMENTO STREET NEIGHBORHOOD COMMERCIAL |
| DPW | 2025 | Various Locations Pavement Renovation No.60 and Sewer Replacement | Clay St and Fillmore St | UPPER FILLMORE NEIGHBORHOOD COMMERCIAL DISTRICT |
| DPW | 2025 | Various Locations Pavement Renovation No.60 and Sewer Replacement | Eddy St and Fillmore St | FILLMORE STREET NEIGHBORHOOD COMMERCIAL TRANSIT |
| DPW | 2025 | PW FOLSOM STREETSCAPE PROJECT | Folsom St and 10th St | REGIONAL COMMERCIAL |
| DPW | 2025 | PW FOLSOM STREETSCAPE PROJECT | Folsom St and 9th St | FOLSOM STREET NEIGHBORHOOD COMMERCIAL TRANSIT |

Docusign Envelope ID: 738ED1B4-5B8C-4CCF-B161-FC57E451DC0A

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| DPW | 2025 | PW FOLSOM STREETSCAPE PROJECT | Folsom St and Harriet St | SOMA NEIGHBORHOOD COMMERCIAL TRANSIT |
| DPW | 2025 | Japantown Peace Plaza Renovation | Geary Blvd and Buchanan St | JAPANTOWN NEIGHBORHOOD COMMERCIAL DISTRICT |
| DPW | 2025 | Hunters Point, Central Waterfront & Potrero Hill Area St Pavement Renovation & Sewer Replacement | Newcomb Ave and Third St | BAYVIEW NEIGHBORHOOD COMMERCIAL DISTRICT |
| DPW | 2025 | PW Various Locations Pavement Renovation No. 67A | Geary Blvd and 14th Ave | GEARY BOULEVARD NEIGHBORHOOD COMMERCIAL DISTRICT |
| DPW | 2025 | Various Locations Pavement Renovation No. 75 and Sewer Replacement | 14th St and Church St | UPPER MARKET NEIGHBORHOOD COMMERCIAL TRANSIT |
| DPW | 2025 | Market and Octavia Living Alleyways Phase 1A | Octavia Blvd and Hickory St | HAYES NCT |
| DPW | 2025 | Various Locations Pavement Renovation No. 62 and Sewer Replacement | Jessie St and 6th St | SOMA NEIGHBORHOOD COMMERCIAL TRANSIT |

Docusign Envelope ID: 738ED1B4-5B8C-4CCF-B161-FC57E451DC0A

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| DPW | 2025 | PW Various Locations Pavement Renovation No.71A and Sewer Replacement | Chestnut St and Columbus St | NORTH BEACH NEIGHBORHOOD COMMERCIAL |
| DPW | 2025 | PW Various Locations Pavement Renovation No.71A and Sewer Replacement | Broadway and Romolo Pl | BROADWAY NEIGHBORHOOD COMMERCIAL |
| DPW | 2025 | 8th St. Clay St., and Leavenworth St Pavement Renovation and Sewer Replacement | Folsom St and 8th St | FOLSOM STREET NEIGHBORHOOD COMMERCIAL TRANSIT |
| DPW | 2025 | 9th St. Clay St., and Leavenworth St Pavement Renovation and Sewer Replacement | Clay St and Polk St | POLK STREET NEIGHBORHOOD COMMERCIAL |
| DPW | 2025 | PW Various Locations Pavement Renovation No.74 and Sewer Replacement | Geneva Ave and Paris St | EXCELSIOR OUTER MISSION STREET NEIGHBORHOOD |
| DPW | 2025 | Various Locations Curb Ramps No.17 | 30th Ave and Judah St | JUDAH STREET NEIGHBORHOOD COMMERCIAL DISTRICT |

Docusign Envelope ID: 738ED1B4-5B8C-4CCF-B161-FC57E451DC0A

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| DPW | 2025 | Various Locations Curb Ramps No.17 | Ocean Ave and Victoria St | OCEAN AVENUE NEIGHBORHOOD COMMERCIAL TRANSIT |
| DPW | 2025 | Various Locations Pavement Renovation No. 73 and Sewer Replacement | 6th Ave and Hugo St | INNER SUNSET NEIGHBORHOOD COMMERCIAL |
| DPW | 2025 | As-Needed Citywide Pavement Preservation Contract 6 (General As-Needed Contract G29) | Diamond St and Wilder St | GLEN PARK NEIGHBORHOOD COMMERCIAL TRANSIT |

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| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: December 1, 2025 SFAC Full Commission Agenda Posted |
| **Date:** | Tuesday, November 25, 2025 4:20:07 PM |
| **Attachments:** | image001.png<br>December_01_2025_Agenda_-_Full_Commission_Meeting.pdf |

Hello,

Please see attached agenda for the Full Arts Commission meeting for December 1, 2025.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

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**From:** Dhaliwal, Manraj (ART) <manraj.dhaliwal@sfgov.org>
**Sent:** Tuesday, November 25, 2025 3:30 PM
**Subject:** December 1, 2025 SFAC Full Commission Agenda Posted

Hello,

The agenda for the Monday, December 1, 2025, Full Commission meeting has been posted:

Full Arts Commission Meeting | San Francisco (sf.gov)

Agenda

Thank you,
Manraj

**Manraj Dhaliwal**
Commission Secretary
Pronouns: he/him
Email: manraj.dhaliwal@sfgov.org
Phone: 415-252-2247
Mobile: 415-940-1803

**San Francisco Arts Commission**
401 Van Ness Avenue, Suite 325
San Francisco, CA 94102

www.sfartscommission.org

Newsletter | Flickr | LinkedIn | Facebook | Instagram | TikTok | Twitter | YouTube

The San Francisco Arts Commission acknowledges that we are on the unceded ancestral homeland of the Ramaytush Ohlone. We affirm the sovereign rights of their community as First Peoples and are committed to supporting the traditional and contemporary evolution of the American Indian community and uplifting contemporary indigenous voices and culture.

Please be mindful that all correspondence and documents submitted to the San Francisco Arts Commission are public records and, as such, are subject to the Sunshine Ordinance and can be requested by the public. If this happens, personal information such as personal emails, Social Security numbers and phone numbers will be redacted.

# MEETING OF THE FULL ARTS COMMISSION

**Monday, December 01, 2025**
**2 p.m.**
**City Hall, Room 416**
**1 Dr. Carlton B. Goodlett Place**

## Agenda

Members of the Commission will attend this meeting in person at the location listed above.

Members of the public are invited to observe the meeting in person at the physical meeting location listed above or remotely online SFGovTV2. Members of the public attending the meeting in-person will have an opportunity to provide up to three minutes of public comment on every agenda item.

Arts Commissioners: Charles Collins, President; Janine Shiota, Vice President; JD Beltran, J. Riccardo Benavides, Seth Brenzel, Patrick Carney, Suzie Ferras, Nabiel Musleh, Al Perez, McKenna Quint, Jessica Rothschild, Marcus Shelby, Debra Walker, Lydia So, ex officio (non-voting)

### 1. Call to Order, Roll Call, Agenda Changes, Land Acknowledgment

1. Call to order
2. Roll call / Confirmation of quorum
3. Agenda Changes
4. Ramaytush Ohlone Land Acknowledgement

The San Francisco Arts Commission acknowledges that we are on the unceded ancestral homeland of the Ramaytush Ohlone who are the original inhabitants of the San Francisco Peninsula. As the indigenous

stewards of this land and in accordance with their traditions, the Ramaytush Ohlone have never ceded, lost nor forgotten their responsibilities as the caretakers of this place, as well as for all peoples who reside in their traditional territory. As guests, we recognize that we benefit from living and working on their traditional homeland. We wish to pay our respects by acknowledging the ancestors, elders and relatives of the Ramaytush Community and by affirming their sovereign rights as First Peoples. As a department dedicated to promoting a diverse and equitable Arts and Culture environment in San Francisco, we are committed to supporting the traditional and contemporary evolution of the American Indian community.

## 2. Approval of Minutes
***Discussion and Possible Action***

Discussion and possible action to approve November 3, 2025, Draft Minutes

**Presentation Time:** Approximately 5 minutes

**Explanatory Document:** November 3, 2025, Draft Minutes

## 3. General Public Comment
***Discussion***

*(This item is to allow members of the public to comment generally on matters within the Commission's purview as well as to suggest new agenda items for the Commission's consideration.)*

## 4. Director's Report
***Discussion***

*Current administrative, budgetary, legislative and programming developments and announcements.*

**Staff Presenter:** Director of Cultural Affairs Ralph Remington

**Presentation Time:** Approximately 10 minutes

## 5. Committee Reports and Committee Matters

### 1. Civic Design Committee – Debra Walker, Chair

#### 1. Civic Design Committee Report
***Discussion***

**Presentation Time:** Approximately 10 minutes

Report from the Civic Design Committee regarding activities of the Committee and the Projects.

### 2. Visual Arts Committee – Suzie Ferras, Chair

#### 1. Visual Arts Committee Report
***Discussion***

**Presentation Time:** Approximately 10 minutes

Report from the Visual Arts Committee regarding activities of the Committee and the Program.

## 6. Consent Calendar
***Discussion and possible action***

**Presentation Time:** Approximately 5 minutes

The following items are included in the Consent Calendar subject to withdrawal at the request of a commissioner.

1. Motion to approve the November 17, 2025, Civic Design Review Committee Meeting Minutes.

   **Civic Design Review Committee Recommendations (November 17, 2025, *link to agenda*)**

2. Motion to approve Phase 3 Review for Cargo Building 626.1

3. Motion to approve Phase 3 Review for SFO Terminal 3 West Modernization

4. Motion to approve Phase 3 Review for SFO Terminal 3 West Modernization: Courtyard 4 Connector (C4C)

   **Visual Arts Committee Recommendations (November 19, 2025, *link to agenda*)**

5. Motion to authorize the Director of Cultural Affairs to enter into a contract with Atthowe Fine Art Services under Chapter 21 of the San Francisco Administrative Code, in an amount not to exceed $1,000,000, for as-needed fine art services to support the Public Art Program.

6. Motion to authorize the Director of Cultural Affairs to enter into a contract with Atthowe Fine Art Services under Chapter 6 of the San Francisco Administrative Code, in an amount not to exceed $1,500,000, for as-needed fine art services to support the Public Art Program.

7. Motion to authorize the Director of Cultural Affairs to enter into a contract with Atthowe Fine Art Services under Chapter 21 of the San Francisco Administrative Code, in an amount not to exceed $1,500,000, for as-needed fine art services to support the Civic Art Collection.

8. Motion to authorize the Director of Cultural Affairs to enter into a contract with Atthowe Fine Art Services under Chapter 6 of the San Francisco Administrative Code, in an amount not to exceed $1,000,000, for as-needed fine art services to support the Civic Art Collection.

9. Motion to authorize the Director of Cultural Affairs to enter into a contract with ARG Conservation Services, Inc. under Chapter 6 of the San Francisco Administrative Code, in an amount not to exceed $2,000,000, for as-needed fine art services, including conservation of various large-scale artworks in the Civic Art Collection.

10. Motion to rescind RESOLUTION NO. 0905-25-136 and approve the amended list of two-dimensional artworks for purchase and display at Gene Friend Recreation Center Project:
    1. Cherisse Alcantara, *Victoria Manalo Draves Park*, 2022, Oil on canvas, 30h x 40w inches, $3,000
    2. Kimberley Acebo Arteche, *Untitled (Places, Icons, Situations – Memories we must not let fade)*, 2020, Screenprint and digital archival print, 30h x 24w inches, $1,500
    3. Rina Ayuyang, *Finding Filipino in SOMA*, 2023, Print, 23h x 16w inches, Limited Edition 1 of 2, $600
    4. Leo Bersamina, *Forty-Fives*, 2024, Acrylic stain on wood, 16.5h x 13.5w x 1d inches, $2,500
    5. Cristine Blanco, *Kapamilya Yard I and 2*, 2021, House paint and aerosol spray on wood, 42h x 57w inches, $3,000
    6. Mel Vera Cruz, *Ligo Sardines*, 2017, Mixed media, 40h x 30w inches, $2,200
    7. Kija Lucas, *Birds of Paradise 4*, 2025, Archival pigment print, 30h x 24w inches, $3,000
    8. Francesca Villa Mateo (DBA ChiChai Mateo), *Bola Ay Buhay/Ball is Life*, 2025, Mixed textiles and vinyl, 37 x 32.75 inches, $3,000
    9. Johanna Poethig, *Corrugated Memories: Malate School Day*, 2022, Ceramic on wood backing, 18h x 14w x 2d inches, $3,000

10. Jerome Reyes, *the horizon toward which we move always recedes before us (Gene Friend Recreation Center),* 2023, Ink, correction fluid, tape, spray paint, vellum, 21.5h x 34 inches, $3,000
11. Favianna Rodriguez, *Mountain People 4*, 2023, Collage with linoleum block and phototransfer elements, 22.5h x 15w inches, $800
12. Charlene Tan, *Research and Remembering*, Ube 2, 2024, Ube, pigment, photo, acrylic paint, wood, 48hx 37w inches, $3,000

11. Motion to approve *Dolores,* a mural design by Juan Manuel Carmona. The mural will be installed at 1057 Valencia Street, in District 9. The mural measures approximately H7 ft. by W15 ft. The artwork is funded by San Francisco Artists Grant and will not become part of the Civic Art Collection. The artwork will be maintained by the artist.

12. Motion to approve *Friego,* a mural design by Juan Manuel Carmona. The mural will be installed at 635 South Van Ness Ave, in District 9. The mural measures approximately H7 ft. by W22 ft. The artwork is funded by San Francisco Artists Grant and will not become part of the Civic Art Collection. The artwork will be maintained by the artist and the HOA.

13. Motion to approve *Big Wave and Carville,* a mural design by Brian Barneclo. The mural will be installed at Java Beach Café, 1396 La Playa, in District 4. The mural measures approximately H12 ft. by W36 ft. The artwork is funded by SF Shines Grant, a program of the Community Economic Development (CED) division of the Office of Economic and Workforce Development and will not become part of the Civic Art Collection; the artwork will be maintained by Java Beach Café.

14. Motion to authorize the Director of Cultural Affairs to review and approve proposals for temporary light projection artwork ("Yerba

Buena Lane Projection Art") to be installed on the Humboldt Bank Building, located at 785 Market Street, managed by the Yerba Buena Community Benefit District. This project is funded by the Office of Economic and Workforce Development. Approval is for artwork installations through December 31, 2026. The artwork will be maintained by A3 Visual LLC.

15. Motion to approve the six final designs by Adrian Arias for the 2026 Art on Market Street Poster Series.

16. Motion to approve Christine Wong Yap, Bijun Liang, Windy Chien as finalists for the Chinatown Him Mark Lai Branch Library Public Art Project, as recommended by the Artist Review Panel.

17. Motion to approve the final design and construction documentation of *Nopal de la Misión*, a wall-integrated artwork by Juana Alicia Araiza for the Mission Branch Library Public Art Project, located at 24th and Bartlett Streets in the Mission District.

18. Motion to approve an increase of Lite Brite Neon Studio LLC's contract from $1,630,907 to $1,758,588 (an increase of $127,681) to include revised scope for fabrication, transportation, and consultation during installation of an artwork by Andrea Bowers (DBA Radical Patience Inc.) for the San Francisco International Airport: Harvey Milk Terminal 1 Underpass Lighting Project.

**7. In Memoriam**
***Discussion***

**8. Adjournment**
***Action***

Agenda posted 11/25/2025 3:30 p.m., md

## Notices

The meetings of the San Francisco Arts Commission will be held in-person at City Hall Room 416, available to view on SFGovTV2, Comcast 78/Astound 28 and AT&T Uverse 99.

## Agenda Item Information / Materials Available

Each item on the agenda may include the following documents:
1) Department or Agency or report;
2) Public correspondence;
3) Other explanatory documents.

Explanatory documents listed above, as well as documents created or distributed after the posting of this agenda to the Arts Commission will be available only electronically, please contact: Commission Secretary Manraj Dhaliwal at manraj.dhaliwal@sfgov.org or 415-252-2247. PLEASE NOTE: The Arts Commission often receives documents created or submitted by other City officials, agencies or departments after the posting of the Arts Commission agenda. For such documents or presentations, members of the public may wish to contact the originating agency if they seek documents not yet provided to the Arts Commission.

## Meeting Procedures

1. Agenda items will normally be heard in order. Please note, that on occasion a special circumstance may necessitate that an agenda item be taken out of order. To ensure that an agenda item is not missed, it is advised to arrive at the beginning of the meeting. All agenda changes will be announced by the Chair at the top of the meeting.

2. Public comment will be taken before or during the Committee's consideration of each agenda item. Each speaker will be allowed to speak for the time allotted by the Chair at the top of the meeting or up to three (3) minutes.

3. During General Public Comment, members of the public may address the Commissioners on matters that are within the Arts Commission's jurisdiction and are not on the agenda.

4. Persons who spoke during the public comment period at a meeting of the Arts Commission may supply a brief written summary of the comments to be included in the minutes if it is 150 words or less. The Arts Commission may reject the summary if it exceeds the prescribed word limit or is not an accurate summary of the speaker's public comment.

5. Persons unable to attend an Arts Commission meeting may submit correspondence to the Arts Commission in connection with an agenda item. The Commission Secretary will post these documents adjacent to the agenda if they are one page in length. If they are longer than one page, the Arts Commission will make such documents available for public inspection and copying. Please note, correspondence submitted to the Arts Commission will NOT be read aloud during the meeting. Names and addresses included in these submittals will be public. Submittals may be made anonymously. Written comments pertaining to this meeting should be submitted to art-info@sfgov.org.

**Electronic Devices Prohibited**
The ringing of and use of cell phones, pagers, and similar sound-producing electronic devices are prohibited at this meeting, except as necessary to participate remotely. The Chair may order the exclusion from participation of any person responsible for improper disruptions to this remote meeting.

**Disability Access**
To obtain a disability-related modification or accommodation, including auxiliary aids or services, to participate in the meeting, please contact Manraj Dhaliwal at manraj.dhaliwal@sfgov.org or 415-252-2247, at least 48 hours before the meeting, except for Monday meetings, for which the deadline is 4:00 p.m. the previous Friday.

**Archives Available**
A recording of this meeting will be available online, 48 hours after the meeting.

**Lobbyist Registration and Reporting Requirements**
Individuals and entities that influence or attempt to influence local legislative or administrative action may be required by the San Francisco Lobbyist Ordinance (San Francisco Campaign and Governmental Conduct

Code sections 2.100-2.160) to register and report lobbying activity. For more information about the Lobbyist Ordinance, please contact the Ethics Commission at 25 Van Ness Avenue, Suite 220, San Francisco, CA 94102, telephone 415/252-3100, fax 415/252-3112 and http://www.sfethics.org/.

**Sunshine Ordinance**
Government's duty is to serve the public, reaching its decision in full view of the public. Commissions, boards, councils and other agencies of the City and County exist to conduct the people's business. This ordinance assures that deliberations are conducted before the people and that City operations are open to the people's review. For more information on your rights under the Sunshine Ordinance or to report a violation of the ordinance, contact by mail to Administrator, Sunshine Ordinance Task Force, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco CA 94102-4689; by phone at 415-554 7724; by fax at 415-554 7854; or by email at sotf@sfgov.org.

Citizens interested in obtaining a free copy of the Sunshine Ordinance can request a copy from by printing Chapter 67 of the San Francisco Administrative Code on the Internet, http://www.sfgov.org/sunshine/

**Accessibility Meeting Policy**
Per the American Disabilities Act and the Language Access Ordinance, Chinese, Spanish, and/or American Sign Language interpreters will be available upon request. Additionally, every effort will be made to provide a sound enhancement system, meeting materials in alternative formats, and/or a reader. Minutes may be translated after they have been adopted by the Commission. For all these requests, please contact Commission Secretary Manraj Dhaliwal at least 48 hours before the meeting at 415-252-2247, manraj.dhaliwal@sfgov.org. Late requests will be honored if possible. The meeting room is wheelchair accessible.

**利便參與會議的相關規定**
根據美國殘疾人士法案和語言服務條例，中文、西班牙語、和/或美國手語翻譯人員在收到要求後將會提供翻譯服務。另外，我們將盡力提供擴音設備。同時也將會提供不同格式的會議資料， 和/或者提供閱讀器。此外，翻譯版本的會議記錄可在委員會通過後提供。上述的要求，請於會議前最少48小時

致電415-252-2247向 Manraj Dhaliwal, manraj.dhaliwal@sfgov.org 提出。逾期提出的請求，若可能的話，亦會被考慮接納。聽證室設有輪椅通道。

**POLITICA DE ACCESO A LA REUNIÓN**
De acuerdo con la Ley sobre Estadounidenses con Discapacidades (American Disabilities Act) y la Ordenanza de Acceso a Idiomas (Language Access Ordinance) intérpretes de chino, español, y lenguaje de señas estarán disponibles de ser requeridos. En adición, se hará todo el esfuerzo posible para proveer un sistema mejoramiento de sonido, materiales de la reunión en formatos alternativos, y/o proveer un leedor. Las minutas podrán ser traducidas luego de ser aprobadas por la Comisión. Para solicitar estos servicios, favor contactar a Commission Secretary, Manraj Dhaliwal, por lo menos 48 horas antes de la reunión al 415-252-2247, manraj.dhaliwal@sfgov.org. Las solicitudes tardías serán consideradas de ser posible. La sala de audiencia es accesible a silla de ruedas.

**Patakaran para sa pag-access ng mga Miting**
Ayon sa batas ng American Disabilities Act at ng Language Access Ordinance, maaring mag-request ng mga tagapagsalin wika sa salitang Tsino, Espanyol at/o sa may kapansanan pandinig sa American Sign Language. Bukod pa dito, sisikapin gawan ng paraan na makapaglaan ng gamit upang lalong pabutihin ang inyong pakikinig, maibahagi ang mga kaganapan ng miting sa iba't ibang anyo, at/o isang tagapagbasa. Ang mga kaganapan ng miting ay maaring isalin sa ibang wika matapos ito ay aprobahan ng komisyon. Sa mga ganitong uri ng kahilingan, mangyari po lamang makipag ugnayan kay Commission Secretary Manraj Dhaliwal sa 415-252-2247, manraj.dhaliwal@sfgov.org. Magbigay po lamang ng hindi bababa sa 48 oras na abiso bago ng miting. Kung maari, ang mga late na hiling ay posibleng tanggapin. Ang silid ng pagpupulungan ay accessible sa mga naka wheelchair.

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: December 8, 2025 SFAC Nominating Committee Agenda Posted |
| **Date:** | Wednesday, December 3, 2025 4:37:54 PM |
| **Attachments:** | image001.png<br>December_8_2025__Agenda_-_Nominating_Committee_Meeting.pdf |

Hello,

Please see attached agenda and below communication for the Full Arts Commission Nominating Committee meeting for December 8, 2025.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
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**From:** Dhaliwal, Manraj (ART) <manraj.dhaliwal@sfgov.org>
**Sent:** Wednesday, December 3, 2025 3:26 PM
**Subject:** December 8, 2025 SFAC Nominating Committee Agenda Posted

Hello,

The agenda for the Monday, December 8, 2025, Nominating Committee meeting has been posted:

Nominating Committee Meeting | San Francisco (sf.gov)

Agenda

Thank you,
Manraj

**Manraj Dhaliwal**
Commission Secretary
Pronouns: he/him
Email: manraj.dhaliwal@sfgov.org
Phone: 415-252-2247
Mobile: 415-940-1803

**San Francisco Arts Commission**
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www.sfartscommission.org

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The San Francisco Arts Commission acknowledges that we are on the unceded ancestral homeland of the Ramaytush Ohlone. We affirm the sovereign rights of their community as First Peoples and are committed to supporting the traditional and contemporary evolution of the American Indian community and uplifting contemporary indigenous voices and culture.

Please be mindful that all correspondence and documents submitted to the San Francisco Arts Commission are public records and, as such, are subject to the Sunshine Ordinance and can be requested by the public. If this happens, personal information such as personal emails, Social Security numbers and phone numbers will be redacted.

# MEETING OF THE FULL ARTS COMMISSION

**Monday, December 08, 2025**
**12 p.m.**
**City Hall, Room 408**
**1 Dr. Carlton B. Goodlett Place**

## Agenda

Members of the Commission will attend this meeting in person at the location listed above.

Members of the public are invited to observe the meeting in person at the physical meeting location listed above or remotely online at SFGovTV2. Members of the public attending the meeting in-person will have an opportunity to provide up to three minutes of public comment on every agenda item.

Nominating Committee: Marcus Shelby (Chair), Seth Brenzel, Suzie Ferras

### 1. Call to Order, Roll Call, Agenda Changes, Land Acknowledgment

1. Call to order
2. Roll call / Confirmation of quorum
3. Agenda Changes
4. Ramaytush Ohlone Land Acknowledgement

The San Francisco Arts Commission acknowledges that we are on the unceded ancestral homeland of the Ramaytush Ohlone who are the original inhabitants of the San Francisco Peninsula. As the indigenous stewards of this land and in accordance with their traditions, the Ramaytush Ohlone have never ceded, lost nor forgotten their responsibilities as the caretakers of this place, as well as for all peoples

who reside in their traditional territory. As guests, we recognize that we benefit from living and working on their traditional homeland. We wish to pay our respects by acknowledging the ancestors, elders and relatives of the Ramaytush Community and by affirming their sovereign rights as First Peoples. As a department dedicated to promoting a diverse and equitable Arts and Culture environment in San Francisco, we are committed to supporting the traditional and contemporary evolution of the American Indian community.

**2. General Public Comment**
***Discussion***

*(This item is to allow members of the public to comment generally on matters within the Commission's purview as well as to suggest new agenda items for the Commission's consideration.)*

**4. Nomination of Candidates**
***Discussion and Possible Action***

Discussion and possible motion to nominate candidates for Arts Commission President and Vice President.

**5. Adjournment**
***Action***

Agenda posted 09/30/2024 1:10 p.m., md

**Notices**

The meetings of the San Francisco Arts Commission will be held in-person at City Hall Room 416, available to view on SFGovTV2, Comcast 78/Astound 28 and AT&T Uverse 99.

**Agenda Item Information / Materials Available**

Each item on the agenda may include the following documents:
1) Department or Agency or report;
2) Public correspondence;
3) Other explanatory documents.

Explanatory documents listed above, as well as documents created or distributed after the posting of this agenda to the Arts Commission will be available only electronically, please contact: Commission Secretary Manraj Dhaliwal at manraj.dhaliwal@sfgov.org or 415-252-2247. PLEASE NOTE: The Arts Commission often receives documents created or submitted by other City officials, agencies or departments after the posting of the Arts Commission agenda. For such documents or presentations, members of the public may wish to contact the originating agency if they seek documents not yet provided to the Arts Commission.

**Meeting Procedures**

1. Agenda items will normally be heard in order. Please note, that on occasion a special circumstance may necessitate that an agenda item be taken out of order. To ensure that an agenda item is not missed, it is advised to arrive at the beginning of the meeting. All agenda changes will be announced by the Chair at the top of the meeting.

2. Public comment will be taken before or during the Committee's consideration of each agenda item. Each speaker will be allowed to speak for the time allotted by the Chair at the top of the meeting or up to three (3) minutes.

3. During General Public Comment, members of the public may address the Commissioners on matters that are within the Arts Commission's jurisdiction and are not on the agenda.

4. Persons who spoke during the public comment period at a meeting of the Arts Commission may supply a brief written summary of the comments to be included in the minutes if it is 150 words or less. The Arts Commission may reject the summary if it exceeds the prescribed word limit or is not an accurate summary of the speaker's public comment.

5. Persons unable to attend an Arts Commission meeting may submit correspondence to the Arts Commission in connection with an agenda item. The Commission Secretary will post these documents adjacent to the agenda if they are one page in length. If they are longer than one page, the Arts Commission will make such documents available for public inspection and copying. Please note, correspondence submitted to the Arts Commission will NOT be read aloud during the meeting. Names and addresses included in these submittals will be public. Submittals may be made anonymously. Written comments pertaining to this meeting should be submitted to art-info@sfgov.org.

**Electronic Devices Prohibited**
The ringing of and use of cell phones, pagers, and similar sound-producing electronic devices are prohibited at this meeting, except as necessary to participate remotely. The Chair may order the exclusion from participation of any person responsible for improper disruptions to this remote meeting.

**Disability Access**
To obtain a disability-related modification or accommodation, including auxiliary aids or services, to participate in the meeting, please contact Manraj Dhaliwal at manraj.dhaliwal@sfgov.org or 415-252-2247, at least 48 hours before the meeting, except for Monday meetings, for which the deadline is 4:00 p.m. the previous Friday.

**Archives Available**
A recording of this meeting will be available online, 48 hours after the meeting.

**Lobbyist Registration and Reporting Requirements**
Individuals and entities that influence or attempt to influence local legislative or administrative action may be required by the San Francisco Lobbyist Ordinance (San Francisco Campaign and Governmental Conduct Code sections 2.100-2.160) to register and report lobbying activity. For more information about the Lobbyist Ordinance, please contact the Ethics Commission at 25 Van Ness Avenue, Suite 220, San Francisco, CA 94102, telephone 415/252-3100, fax 415/252-3112 and http://www.sfethics.org/.

**Sunshine Ordinance**

Government's duty is to serve the public, reaching its decision in full view of the public. Commissions, boards, councils and other agencies of the City and County exist to conduct the people's business. This ordinance assures that deliberations are conducted before the people and that City operations are open to the people's review. For more information on your rights under the Sunshine Ordinance or to report a violation of the ordinance, contact by mail to Administrator, Sunshine Ordinance Task Force, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco CA 94102-4689; by phone at 415-554 7724; by fax at 415-554 7854; or by email at sotf@sfgov.org.

Citizens interested in obtaining a free copy of the Sunshine Ordinance can request a copy from by printing Chapter 67 of the San Francisco Administrative Code on the Internet, http://www.sfgov.org/sunshine/

**Accessibility Meeting Policy**
Per the American Disabilities Act and the Language Access Ordinance, Chinese, Spanish, and/or American Sign Language interpreters will be available upon request. Additionally, every effort will be made to provide a sound enhancement system, meeting materials in alternative formats, and/or a reader. Minutes may be translated after they have been adopted by the Commission. For all these requests, please contact Commission Secretary Manraj Dhaliwal at least 48 hours before the meeting at 415-252-2247, manraj.dhaliwal@sfgov.org. Late requests will be honored if possible. The meeting room is wheelchair accessible.

**利便參與會議的相關規定**
根據美國殘疾人士法案和語言服務條例，中文、西班牙語、和/或美國手語翻譯人員在收到要求後將會提供翻譯服務。另外，我們將盡力提供擴音設備。同時也將會提供不同格式的會議資料， 和/或者提供閱讀器。此外，翻譯版本的會議記錄可在委員會通過後提供。上述的要求，請於會議前最少48小時致電415-252-2247向 Manraj Dhaliwal, manraj.dhaliwal@sfgov.org 提出。逾期提出的請求，若可能的話，亦會被考慮接納。聽證室設有輪椅通道。

**POLITICA DE ACCESO A LA REUNIÓN**
De acuerdo con la Ley sobre Estadounidenses con Discapacidades (American Disabilities Act) y la Ordenanza de Acceso a Idiomas (Language

Access Ordinance) intérpretes de chino, español, y lenguaje de señas estarán disponibles de ser requeridos. En adición, se hará todo el esfuerzo posible para proveer un sistema mejoramiento de sonido, materiales de la reunión en formatos alternativos, y/o proveer un leedor. Las minutas podrán ser traducidas luego de ser aprobadas por la Comisión. Para solicitar estos servicios, favor contactar a Commission Secretary, Manraj Dhaliwal, por lo menos 48 horas antes de la reunión al 415-252-2247, manraj.dhaliwal@sfgov.org. Las solicitudes tardías serán consideradas de ser posible. La sala de audiencia es accesible a silla de ruedas.

**Patakaran para sa pag-access ng mga Miting**
Ayon sa batas ng American Disabilities Act at ng Language Access Ordinance, maaring mag-request ng mga tagapagsalin wika sa salitang Tsino, Espanyol at/o sa may kapansanan pandinig sa American Sign Language. Bukod pa dito, sisikapin gawan ng paraan na makapaglaan ng gamit upang lalong pabutihin ang inyong pakikinig, maibahagi ang mga kaganapan ng miting sa iba't ibang anyo, at/o isang tagapagbasa. Ang mga kaganapan ng miting ay maaring isalin sa ibang wika matapos ito ay aprobahan ng komisyon. Sa mga ganitong uri ng kahilingan, mangyari po lamang makipag ugnayan kay Commission Secretary Manraj Dhaliwal sa 415-252-2247, manraj.dhaliwal@sfgov.org. Magbigay po lamang ng hindi bababa sa 48 oras na abiso bago ng miting. Kung maari, ang mga late na hiling ay posibleng tanggapin. Ang silid ng pagpupulungan ay accessible sa mga naka wheelchair.

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Letter of Inquiry from Supervisor Mahmood - CPC response Civic Center Public Realm Plan |
| **Date:** | Tuesday, December 2, 2025 11:06:57 AM |
| **Attachments:** | CCPRP_D5 LOI_CPC response_20251125.pdf<br>25.10.28 Mahmood CTA_ Clerk"s Memo Signed.pdf<br>25.10.28 Mahmood CTA LOI.pdf<br>25.10.28 Mahmood CTA Inro Form.pdf |

Hello,

Please see attached and below communication from the Planning Department (CPC) in response to a Letter of Inquiry issued by Supervisor Bilal Mahmood at the October 28, 2025, Board of Supervisors meeting.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

---

**From:** Race, Patrick (CPC) <patrick.race@sfgov.org>
**Sent:** Tuesday, November 25, 2025 1:45 PM
**To:** Cooper, Raynell (BOS) <raynell.cooper@sfgov.org>
**Cc:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; Dennis Phillips, Sarah (CPC) <sarah.dennis-phillips@sfgov.org>; Tanner, Rachael (CPC) <rachael.tanner@sfgov.org>; Shaw, Jeremy (CPC) <jeremy.shaw@sfgov.org>; Dwyer, Debra (CPC) <debra.dwyer@sfgov.org>
**Subject:** Letter of Inquiry from Supervisor Mahmood - CPC response Civic Center Public Realm Plan

Dear Raynell,

Please see the attached response to the Letter of Inquiry issued by Supervisor Mahmood at the October 28, 2025 Board of Supervisor's meeting.

Many thanks,
Patrick

**Patrick Race, PLA (he / him)**
**Senior Landscape Architect & Planner**
**Citywide Planning**

San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7461 | www.sfplanning.org
San Francisco Property Information Map

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

November 25, 2025

Supervisor Bilal Mahmood
District 5
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102

Re: **Civic Center Public Realm Plan – Response to Letter of Inquiry**
Planning Department File No. 2015-000937CWP

Dear Supervisor Mahmood:

This letter is in response to the Letter of Inquiry sent by your office to the Planning Department on October 28, 2025. The intent of the inquiry was to determine the status of the Civic Center Public Realm Plan, its implementation, and progression via updates on estimated costs, funding sources, timeline for work, and opportunities for progress.

**Estimated Costs**

A conceptual estimate of probable construction cost was conducted for the concept designs advanced by the Plan. This was completed in 2019 by M Lee Corporation, a respected local program management and cost estimating firm. The attachment outlines the conceptual estimate of probable construction cost for each public space geography. Costs are shown in 2019 dollars and have not been adjusted for inflation.

Design costs and environmental clearance costs are not known, and no additional estimates have been completed.

**Funding Sources**

No funding has been secured to support these projects, however there are multiple sources that could be used to fund the Plan's recommended improvements.

The Public Realm Plan outlines a substantial investment in public infrastructure, centered around public space and seismic investments. There are a variety of public and private funding precedents for projects of this scale in San Francisco. While the funding may be combined in different ways or phases, project implementation should be consistent with the community's vision.

Public Funding: Voter approved bonds for capital improvements have been used to fund larger public projects within the City including India Basin Park (900 Innes Ave), Japantown Peace Plaza, and Buchanan

Street Mall. This includes general obligation (GO) bonds which are approved by the voters of San Francisco and are backed by the City's property tax revenue and repaid directly out of property taxes.

Private Funding is often undertaken for large, transformative projects of this scale. For example, Tunnel Tops Park was funded by $20 Million from the Presidio Trust and $98 Million raised by the Golden Gate National Parks Conservancy. The potential for funding often depends on an advocacy group that can champion fundraising and implementation consistent with the community-built vision. India Basin Waterfront Park also benefits from private donors.

Grants can also help fund the planning, design and capital costs of implementing this Plan. The range of possible grants is wide and can help target different aspects of a project. Many grants fund transportation and safety improvements, and some focus on more specific interventions such as bicycle infrastructure or safe routes to school. Other grants fund open space improvements associated with new housing and regional growth, climate resiliency, and many other project types. Examples of grants include One Bay Area Grant (OBAG), community placemaking grants, and state and federal grants.

The aforementioned sources are not an exhaustive list. The Plan will require creative thinking, advocacy and commitment to secure funding beyond the traditional sources. The suggested phasing plan contained within the Public Realm Plan can also inform the funding strategy and priorities. Ultimately, the City and advocacy groups must take the lead in identifying funds and implementing the Plan, as neighborhood community groups do not have the capacity to do so on their own.

**Timeline for Work**

The Plan, in coordination with other City initiatives, sets forth a 100-year vision to implement community-supported capital improvements that will address the inequities of access to open space and amenities for some of our most vulnerable populations. It creates a road map for upgrading the area, ensuring that Civic Center serves existing neighborhoods, including 6,300 new housing units, for decades to come. The City and County of San Francisco Capital Plan, Fiscal Years 2024-2033 includes the Civic Center Public Realm Plan among emerging projects (see page 125, and 206).

Design Completion – The Plan takes potential improvements to the 10% conceptual level. Additional technical analysis, schematic design, detailed design, construction design, and bidding and construction administration are needed to realize any projects in the Plan. As potential designs progress, additional outreach and engagement would also need to be undertaken, led by a capital agency or consultant. Design completion will range in scope and duration in accordance with the size and complexity of projects and may range from a few months for temporary programming and activation, to several years for a full plaza design.

Environmental Review – compliance with the California Environmental Quality Act (CEQA) is necessary for project implementation. Given the long-term vision for the Plan and the anticipated phasing for funding and implementation, the City would conduct environmental review, as applicable, for individual project elements or groups of interconnected projects as sufficient project details are available. Some pedestrian, bicycle and transit projects may qualify for a statutory exemption under CEQA if they meet specific criteria outlined in Public Resources Code 21080.25 Exemptions for specified transit, bicycle, and pedestrian projects. Streetscape safety improvements proposed by the Plan such as sidewalk extensions, Grove Street

improvements, and other streetscape-related improvements could benefit from this exemption. Additional CEQA review and preservation analysis will be required for larger scale projects like Civic Center Plaza.

Permitting and Construction – will be contingent upon the scope and scale of the project being proposed. Smaller scale interventions like temporary structures, programming, and activation may use Love Our Neighborhoods, Recreation and Parks permits, or other processes that could take a month or more. Larger-scale projects that would require legislation like curb-line changes or street closures would require months to legislate through the MTA Board and other bodies. The construction timeline would vary significantly with project scope. Large-scale projects like Civic Center Plaza would also require legislation and require a longer timeline. Given the Plan overlaps with the Civic Center Historic District, projects will require Historic Preservation Commission review and may require a Certificate of Appropriateness.

Implementation – will need to consider city priorities, available funding, and stakeholder input. The Phasing Plan can help prioritize subprojects. Currently, funding is not available to advance additional subprojects in the Plan. However, Recreation and Parks has improved and activated UN Plaza in ways that are consistent with the Plan. (See additional response below.)

**Opportunities for Progress**

Any planning, visioning, activation, design or construction requires some level of public and/or private funding beyond existing encumbered budgets. Funding and resources are not currently available to advance elements of the Plan.

City agencies, the Civic Center Community Benefit District and other organizations remain active in the area, using the Plan as a road map for public realm improvements. SF Planning will continue to partner with others and use the Plan to inform future planning, activation, and design when funding opportunities arise.

SF Planning does not pursue capital funding or manage capital projects. Should funding become available, the Plan considers the following projects to advance in the near-term:

- Additional free programming and activation centered around multi-generational and community gathering and recreation
- Fulton Street improvements as outlined in the Plan, including full street closure, plaza and lawn improvements, new trees, lighting, paving, and activation of the SF Public Library and Asian Art Museum ‘porches’
- UN Plaza east improvements
    - Leavenworth Dog Park
    - Fountain retrofit + adaptation
    - Fit Park and Community Message Board
    - Leavenworth Gateway Improvements
    - Trees, paving, lighting
- Grove Street ‘Culture Connector’ streetscape improvements between Polk and Larkin Streets as outlined in the Plan, including street closure, new trees, lighting, paving and bikeway

- Street safety improvements, including sidewalk extensions that shorten crossing distances along Vision Zero Corridors

The Public Realm Plan supports existing uses and builds in flexibility. The Plan's recommendations support a variety of programming, activation, and public space amenities as needs grow and change over time.

**Conclusion**

The Civic Center Public Realm Plan's development represented an unprecedented outreach and engagement effort that resulted in an ambitious vision built by the community. The Planning Department remains committed to the Plan's implementation. We will continue to follow up with potential opportunities for funding and remain committed to interagency and community collaboration as we advance toward implementation.

If you have any questions related to the Civic Center Public Realm Plan, please call me at 628.652.7461.

Sincerely,

Patrick Race, PLA
Senior Planner & Landscape Architect

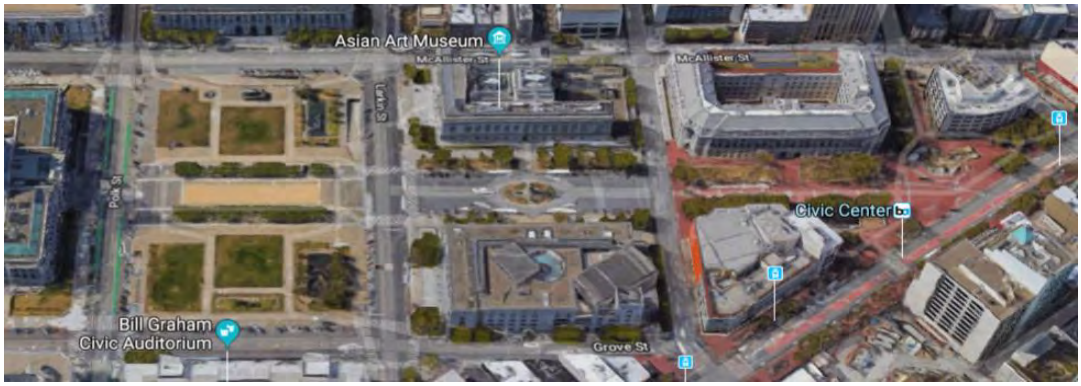
Attachment:
Conceptual Estimate of Probable Construction Cost

Cc:
Sarah Dennis Philips, *Planning Director*
Rachael Tanner, *Director Citywide*
Jeremy Shaw, *Principal Planner*
Debra Dwyer, *Principal Planner*

**CIVIC CENTER PUBLIC SPACE REALM PLAN**
**CIVIC CENTER PUBLIC SPACE DESIGN**
**SAN FRANCISCO, CA**

**CONCEPTUAL ESTIMATE OF PROBABLE CONSTRUCTION COST**
**(AN OPINION OF PROBABLE CONSTRUCTION COST)**
**BASED ON**
**CONCEPTUAL DESIGN INFORMATION**

**OWNER:**
**CITY AND COUNTY OF SAN FRANCISCO**




**Date: 1/14/2019**

1268 Civic Center Public Space Estimate 20190114

**CIVIC CENTER PUBLIC SPACE REALM PLAN**
**CONCEPTUAL ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON**
**CONCEPTUAL DESIGN INFORMATION**

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| 3.4 ESTIMATE DETAILS - LEAVENWORTH | 30-33 |
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**Date: 1/14/2019**

**CIVIC CENTER PUBLIC SPACE REALM PLAN**
**CIVIC CENTER PUBLIC SPACE DESIGN**
**SAN FRANCISCO, CA**

**CONCEPTUAL ESTIMATE OF PROBABLE CONSTRUCTION COST**
**(AN OPINION OF PROBABLE CONSTRUCTION COST)**
**BASED ON**
**CONCEPTUAL DESIGN INFORMATION**

**OWNER:**
**CITY & COUNTY OF SAN FRANCISCO**

Prepared for:
**CMG LANDSCAPE ARCHITECTURE**
500 3rd Street #215
San Francisco, CA 94107

Contact: Willet Moss or Lauren Hackney
Phone: 415-757-2048
Lauren Hackney, Landscape Architect
Willet Moss, PLA FAAR, Partner
Email: lhackney@cmgsite.com; WMoss@cmgsite.com

Prepared by:
**M LEE CORPORATION**
Construction Management & Consulting
601 Montgomery Street, Suite 2040
San Francisco, CA 94111

Contact: Franklin Lee, PE, LEED AP, CEP
Certified Estimating Professional
415-693-0236; flee@mleecorp.com

**Date: 1/14/2019**

## A) Basis of Estimate:

This Estimate is based on the following:

1 Conceptual Design drawings, a total of 23 sheets, prepared by CMG dated 10.31.2018 including the following drawings:
Cost Estimate - Illustrative Key Plan, 1 sheet
Landscaping, 16 sheets
Architectural, 6 sheets

2 Cost Estimate Narrative, dated 10/31/2018, 14 sheets, prepared by CMG

3 Architectural Narrative for Cost Estimate, dated 11/5/2018, 14 sheets, prepared by Kennerly Architects

4 Structural Narrative for Cost Estimate, undated, 17 sheets, prepared by Structus

5 Updated Structural Narrative for Cost Estimate, undated, 17 sheets, prepared by Structus

6 Selected structural as-builts from The San Francisco Main Library project, 4 sheets, dated 5/14/1993

7 Google maps

8 Clarifications with designers/planners

9 Incorporation of comments on draft estimate

## B) General Scope of Work

1 There are three program areas as follows:

1.1 Civic Center Plaza, including portion of Grove Street

1.2 Fulton Mall, including portion of Larkin Street

1.3 United Nation Plaza, including portion of Leavenworth

2 The general scope of work is as follows:

2.1 Demolition of existing elements and protection of remaining elements

2.2 Earthwork and Grading

2.3 Site Materials/Paving

2.4 Planting/Landscaping/Irrigation

2.5 Site utilities including drainage, electrical and lighting

2.6 Surface Architectural Elements (Structures)

## C) Exclusions

The estimate specifically excludes the following items:

1 Abatement of hazmat, if any, unless otherwise noted

2 Contaminated soil disposal, if any, unless otherwise noted

3 Permit and plan check fees

4 Administration costs such as bidding, advertising and contract award

5 Professional fees for architect, engineers, consultants, construction management and other soft costs
6 Costs for independent testing and inspection
7 Project reserve
8 Cost escalation beyond the date of this estimate
9 Bill Graham Civic Auditorium interior modifications

It is assumed that the above items, if needed, are included elsewhere in the owner's overall project budget.

**D) Assumptions & Qualifications**

1 The work will be done during regular working hours.

2 Assumed normal construction period. Construction schedule to be determined.

3 The estimate is based on estimated prices current as of December 2018 with four to five responsible and responsive bids under a competitive bidding environment for a fixed price lump sum contract (a fair market condition).

Note: Experience indicates that fewer bidders may result in higher bids, and conversely more bidders may result in more competitive bids. Therefore it is important to obtain as many bids as possible.

The following table provides a general guideline for probable impacts due to number of bids:

| | |
|---|---|
| 1 bid | +20% to +50% |
| 2-3 bids | +10% to +20% |
| 4-5 bids | 0% to +10% |
| 6-7 bids | 0% to -10% |
| 8 or more bids | -10% to -20% |

4 The following is a list of some items that may affect the cost estimate:
Modifications to the scope of work or assumptions included in this estimate

Unforeseen sub-surface conditions
Special phasing requirements
Restrictive technical specifications or excessive contract conditions
Any specified item of equipment, material, or product that cannot be obtained from at least three different sources
Any other non-competitive bid situations

5 The estimate represents M Lee Corporation's opinion of probable construction costs based on current market conditions and the assumptions and qualifications stated in this Basis of Estimate.

6 Client acknowledges that our estimating service is consistent with and limited to the standard of care applicable to such services, which is that we provide our services consistent with the professional skill and care ordinarily provided by consultants practicing in the same or similar locality under the same or similar circumstances. The estimate is intended to be a determination of fair market value for the project construction. Since we have no control over market conditions, costs of labor, materials, equipment and other factors which may affect the bid prices, we cannot and do not warrant or guarantee that bids or ultimate construction costs will not vary from the cost estimate. We make no other warranties, either expressed or implied, and are not responsible for the interpretation by others of the contents herein the cost estimate.

7 It should be noted that the cost estimate is a "snapshot in time" and that the reliability of this opinion of probable construction cost will inherently degrade over time. The estimate should be updated as design progresses or when market condition has been changed.

8 Please note that the estimate has been prepared based on preliminary information and design assumptions which are subject to verifications and changes as the design progresses. An updated estimate should be prepared when more specific and detailed design information is available.

9 Unit costs include costs for material, labor and equipment, sales tax, and installing contractor's markup.

10 All prices are based on December 2018 dollars. No allowance for cost escalation is included.

11 Abbreviations used in the estimate:
AL = allowance
CY = cubic yard
(E) = existing
EA = each
GSF = gross square foot
LB = pound
LF = linear foot
LOC = location
LS = lump sum
MTH = month
(N) = new
SF = square foot

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST** **Date: 1/14/2019**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**2.1 ESTIMATE GRAND SUMMARY** **ALL IN 2018 DOLLARS**

| Tier | Description | CC Plaza / Grove St Estimate $ | Fulton Mall Estimate $ | UN Plaza Estimate $ | Leavenworth Estimate $ | CC Parking Garage Estimate $ | TOTAL ESTIMATE $ |
|---|---|---|---|---|---|---|---|
| | ***Direct Costs + Markups**** | | | | | | |
| 1 | Demolition/Existing Conditions | 5,318,000 | 10,719,000 | 2,684,000 | 322,000 | NONE | 19,043,000 |
| 2 | Earthwork and Grading | 9,580,000 | 13,283,000 | 1,212,000 | 719,000 | NONE | 24,794,000 |
| 3 | Site Materials/Paving | 25,677,000 | 7,349,000 | 4,875,000 | 2,060,000 | NONE | 39,961,000 |
| 4 | Planting/Landscaping | 4,523,000 | 1,544,000 | 796,000 | 396,000 | NONE | 7,259,000 |
| 5 | Irrigation | 1,212,000 | 659,000 | 74,000 | 63,000 | NONE | 2,008,000 |
| 6 | Site Electrical & Site Lighting | 2,660,000 | 965,000 | 479,000 | 375,000 | NONE | 4,479,000 |
| 7 | Non-potable Water Reuse | 1,842,000 | 422,000 | 98,000 | 192,000 | NONE | 2,554,000 |
| | Subtotal: Public Realm | 50,812,000 | 34,941,000 | 10,218,000 | 4,127,000 | NONE | 100,098,000 |
| | Public Realm Area, SF | 352,000 | 128,000 | 89,500 | 40,600 | NONE | 610,100 |
| | $/SF | 144 | 273 | 114 | 102 | NONE | 164 |
| 8 | Surface Architectural Elements | 26,097,000 | 7,875,000 | 18,395,000 | NONE | NONE | 52,367,000 |
| | Above-grade Structures, SF | 13,100 | 2,500 | 8,000 | NONE | NONE | 23,600 |
| | $/SF | 1,992 | 3,150 | 2,299 | NONE | NONE | 2,219 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST** **Date: 1/14/2019**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**2.1 ESTIMATE GRAND SUMMARY** **ALL IN 2018 DOLLARS**

| Tier | Description | CC Plaza / Grove St Estimate $ | Fulton Mall Estimate $ | UN Plaza Estimate $ | Leavenworth Estimate $ | CC Parking Garage Estimate $ | TOTAL ESTIMATE $ |
|---|---|---|---|---|---|---|---|
| 9 | Brooks Hall additional structure - per attached 3.1 Details | 4,742,000 | NONE | NONE | NONE | NONE | 4,742,000 |
| 9.1 | Structural Retrofit - based on previous Brooks Hall estimate | 31,969,000 | NONE | NONE | NONE | NONE | 31,969,000 |
| 9.2 | Core + Shell - based on previous Brooks Hall estimate | 35,094,000 | NONE | NONE | NONE | NONE | 35,094,000 |
| 9.3 | Tenant Improvements - based on previous Brooks Hall estimate | 27,789,000 | NONE | NONE | NONE | NONE | 27,789,000 |
| 10 | Civic Center Parking Garage | SEE BREAKOUT | NONE | NONE | NONE | 9,014,000 | 9,014,000 |
| 11 | Other Below-grade Structures | NONE | 2,051,000 | 1,439,000 | NONE | NONE | 3,490,000 |
| | Subtotal: Below-grade Structures | 99,594,000 | 2,051,000 | 1,439,000 | NONE | 9,014,000 | 112,098,000 |
| | Below-grade Structures, SF | 116,600 | 10,400 | 1,700 | NONE | 201,200 | 329,900 |
| | $/SF | 854 | 197 | 846 | NONE | 45 | 340 |
| 12 | Public Art Allowance | 816,000 | 449,000 | 300,000 | 41,000 | NONE | 1,606,000 |
| | **TOTAL ESTIMATED CONSTRUCTION HARD COST** | **177,319,000** | **45,316,000** | **30,352,000** | **4,168,000** | **9,014,000** | **266,169,000** |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST** **Date: 1/14/2019**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**2.1 ESTIMATE GRAND SUMMARY** **ALL IN 2018 DOLLARS**

| Tier | Description | CC Plaza / Grove St | Fulton Mall | UN Plaza | Leavenworth | CC Parking Garage | TOTAL |
|---|---|---|---|---|---|---|---|
| | | Estimate $ | Estimate $ | Estimate $ | Estimate $ | Estimate $ | ESTIMATE $ |

Notes:

a) *Markups, directly pro-rated to the direct costs, include general contractor's general conditions, bonds & insurance, overhead & profit, design phase estimating contingency, bid market conditions contingency, and construction contingency.

b) Please see attached Estimate Summary for percentages included.

c) Please read the attached "Basis of Estimate" and "Estimate Details" for assumptions, exclusions, qualifications and scope of work

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**2.2 ESTIMATE SUMMARY**

**Date: 1/14/2019**

**ALL IN 2018 DOLLARS**

| | Description | CC Plaza / Grove St | Fulton Mall | UN Plaza | Leavenworth | CC Parking Garage | Total Estimated Cost |
|---|---|---|---|---|---|---|---|
| | Direct Cost from Attached Details | | | | | | |
| 1 | Demolition/Existing Conditions | 2,775,272 | 5,594,285 | 1,400,946 | 168,010 | NONE | 9,938,513 |
| 2 | Earthwork and Grading | 4,999,978 | 6,932,417 | 632,306 | 375,189 | NONE | 12,939,889 |
| 3 | Site Materials/Paving | 13,400,552 | 3,835,386 | 2,544,218 | 1,074,902 | NONE | 20,855,059 |
| 4 | Planting/Landscaping | 2,360,445 | 805,831 | 415,400 | 206,630 | NONE | 3,788,306 |
| 5 | Irrigation | 632,781 | 344,065 | 38,380 | 32,730 | NONE | 1,047,956 |
| 6 | Site Electrical & Site Lighting | 1,388,450 | 503,700 | 250,050 | 195,900 | NONE | 2,338,100 |
| 7 | Non-potable Water Reuse | 961,500 | 220,000 | 51,000 | 100,000 | NONE | 1,332,500 |
| | Subtotal: Public Realm | 26,518,978 | 18,235,683 | 5,332,300 | 2,153,361 | NONE | 52,240,323 |
| | Public Realm Area, SF | 352,000 | 128,000 | 89,500 | 40,600 | NONE | 610,100 |
| | $/SF | $75 | $142 | $60 | $53 | NONE | $86 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**2.2 ESTIMATE SUMMARY**

**Date: 1/14/2019**

**ALL IN 2018 DOLLARS**

| | Description | CC Plaza / Grove St | Fulton Mall | UN Plaza | Leavenworth | CC Parking Garage | Total Estimated Cost |
|---|---|---|---|---|---|---|---|
| 8 | Surface Architectural Elements | 13,620,000 | 4,110,000 | 9,600,000 | NONE | NONE | 27,330,000 |
| | Above-grade Structures, SF | 13,100 | 2,500 | 8,000 | NONE | NONE | 23,600 |
| | $/SF | $1,040 | $1,644 | $1,200 | NONE | NONE | $1,158 |
| 9 | Brooks Hall additional structure - per attached 3.1 Details | 2,474,779 | NONE | NONE | NONE | NONE | 2,474,779 |
| 9.1 | Structural Retrofit - from previous Brooks Hall estimate | 16,684,570 | NONE | NONE | NONE | NONE | 16,684,570 |
| 9.2 | Core + Shell - from previous Brooks Hall estimate | 18,315,546 | NONE | NONE | NONE | NONE | 18,315,546 |
| 9.3 | Tenant Improvements - from previous Brooks Hall estimate | 14,503,000 | NONE | NONE | NONE | NONE | 14,503,000 |
| 10 | Civic Center Parking Garage | SEE BREAKOUT | NONE | NONE | NONE | 4,704,403 | 4,704,403 |
| 11 | Other Below-grade Structures | NONE | 1,070,394 | 751,000 | NONE | NONE | 1,821,394 |
| | Subtotal: Below-grade Structures | 51,977,895 | 1,070,394 | 751,000 | NONE | 4,704,403 | 58,503,692 |
| | Below-grade Structures, SF | 116,600 | 10,400 | 1,700 | NONE | 201,200 | 329,900 |
| | $/SF | $446 | $103 | $442 | NONE | $23 | $177 |
| 12 | Public Art Allowance | 426,100 | 234,200 | 156,800 | 21,500 | NONE | 838,600 |
| | TOTAL DIRECT COST | 92,542,973 | 23,650,277 | 15,840,100 | 2,174,861 | 4,704,403 | 138,912,614 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**2.2 ESTIMATE SUMMARY**

**Date: 1/14/2019**

**ALL IN 2018 DOLLARS**

| Description | | CC Plaza / Grove St | Fulton Mall | UN Plaza | Leavenworth | CC Parking Garage | Total Estimated Cost |
|---|---|---|---|---|---|---|---|
| MARKUPS: | | | | | | | |
| General Contractor's General Conditions | 15.0% | 13,881,446 | 3,547,542 | 2,376,015 | 326,229 | 705,660 | 20,836,892 |
| Bonds and Insurance | 2.0% | 2,128,488 | 543,956 | 364,322 | 50,022 | 108,201 | 3,194,990 |
| Overhead and Profit | 8.0% | 8,684,233 | 2,219,342 | 1,486,435 | 204,089 | 441,461 | 13,035,560 |
| Subtotal | | 117,237,140 | 29,961,117 | 20,066,872 | 2,755,201 | 5,959,725 | 175,980,056 |
| Design Phase Estimating Contingency | 25.0% | 29,309,285 | 7,490,279 | 5,016,718 | 688,800 | 1,489,931 | 43,995,014 |
| Bid Market Conditions Contingency | 10.0% | 14,654,643 | 3,745,140 | 2,508,359 | 344,400 | 744,966 | 21,997,507 |
| Subtotal | | 161,201,068 | 41,196,536 | 27,591,949 | 3,788,401 | 8,194,622 | 241,972,577 |
| Construction Contingency | 10.0% | 16,120,107 | 4,119,654 | 2,759,195 | 378,840 | 819,462 | 24,197,258 |
| Total Estimated Construction Cost In 2018 Dollars, Unescalated | | 177,321,175 | 45,316,190 | 30,351,144 | 4,167,241 | 9,014,084 | 266,169,835 |

Please read the attached "Basis of Estimate" and "Estimate Details" for assumptions, exclusions, qualifications and scope of work

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.1 ESTIMATE DETAILS - CIVIC CENTER PLAZA** **Date: 1/14/2019**

| Line | Tier | Component Description | 352,000 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 1 | **1** | **Demolition/Existing Conditions** | | | | |
| 2 | 1.1 | Existing Elements to Remain or Relocate | | | | |
| 3 | | Helen Diller Civic Center Playgrounds, protect in place | 1 | LS | 7,800.00 | 7,800 |
| 4 | | Armed Forces Flagpole – salvage pole to relocate | 1 | EA | 500.00 | 500 |
| 5 | | (18) Flag poles – salvage poles to relocate | 18 | EA | 500.00 | 9,000 |
| 6 | | 6” Granite and brick curb (east side of Polk St travelway) – salvage for reuse | 527 | LF | 15.00 | 7,905 |
| 7 | | AWSS hydrant with blue top, relocate, including piping & earthwork | 2 | EA | 7,500.00 | 15,000 |
| 8 | | Fire Box – red metal single post – protect in place | 1 | EA | 200.00 | 200 |
| 9 | | Street Lights – protect in place | 4 | EA | 100.00 | 400 |
| 10 | | Live utilities discovered that were not indicated previously- protected in place and removed only at the direction of CCSF. | 1 | AL | 10,000.00 | 10,000 |
| 11 | | | | | | |
| 12 | 1.2 | Demolition | | | | |
| 13 | | Concrete paving | 142,552 | SF | 4.00 | 570,208 |
| 14 | | Street paving | 87,353 | SF | 3.00 | 262,059 |
| 15 | | Lawn | 59,493 | SF | 1.00 | 59,493 |
| 16 | | Decomposed granite | 10,466 | SF | 1.50 | 15,699 |
| 17 | | Trees including stumps | 212 | EA | 250.00 | 53,000 |
| 18 | | Site elements | 20 | EA | 500.00 | 10,000 |
| 19 | | Premium for abatement of hazardous serpentine rock of concrete aggregate pavement, allow | 142,552 | SF | 4.00 | 570,208 |
| 20 | | Existing stairs - abandon, remove guardrails, close opening | 6 | EA | 10,000.00 | 60,000 |
| 21 | | Existing mechanical vents - abandon | 10 | EA | 300.00 | 3,000 |
| 22 | | Foundation for flagpoles | 18 | EA | 5,000.00 | 90,000 |
| 23 | | Footings for lights | 59 | EA | 800.00 | 47,200 |
| 24 | | Waterproofing at plaza area | 229,933 | SF | 1.50 | 344,900 |
| 25 | | Stockpile existing soil and test for horticultural purposes, say 3 ft deep | 25,548 | CY | 25.00 | 638,700 |
| 26 | | | | | | |
| 27 | **1** | **Demolition/Existing Conditions - Subtotal** | | | | **2,775,272** |
| 28 | | | | | | |
| 29 | | | | | | |
| 30 | **2** | **Earthwork and Grading** | | | | |
| 31 | | Grading: raise plaza 18"-36" above existing grade at perimeter using structural foam | 326 | CY | 260.00 | 84,760 |
| 32 | | Aggregate base under paving | 1,207 | CY | 66.00 | 79,662 |
| 33 | | Waterproofing with drain mat & protection board | 229,933 | SF | 10.00 | 2,299,330 |
| 34 | | Roof drainage | 229,933 | SF | 2.50 | 574,833 |
| 35 | | Sub-drainage | 229,933 | SF | 1.50 | 344,900 |
| 36 | | Landscape drainage | 58,180 | SF | 1.00 | 58,180 |
| 37 | | Storm water treatment | | | | |
| 38 | | Bioretention area, 30% of understory planting | 6,792 | sf-key qty | | |
| 39 | | Gravel mulch, 3" thick | 6,792 | SF | 2.40 | 16,301 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.1 ESTIMATE DETAILS - CIVIC CENTER PLAZA** **Date: 1/14/2019**

| | | | 352,000 | gsf | | |
|---|---|---|---|---|---|---|
| **Line** | **Tier** | **Component Description** | **Quantity** | **Unit** | **Unit Cost** | **Estimated Cost** |
| 40 | | Soil, 18" thick | 377 | CY | 160.00 | 60,373 |
| 41 | | Aggregate base, 12" thick | 252 | CY | 66.00 | 16,632 |
| 42 | | Impervious membrane | 6,792 | SF | 1.00 | 6,792 |
| 43 | | Underdrain | 6,792 | SF | 1.50 | 10,188 |
| 44 | | Overflow drain | 20 | EA | 2,000.00 | 40,000 |
| 45 | | Over-structure soil preparation, assume import | 41,279 | SF | 2.25 | 92,878 |
| 46 | | Native soil preparation at sidewalks | None shown | | | |
| 47 | | Planting soil for trees in planting areas | 848 | CY | 71.00 | 60,208 |
| 48 | | Understory planting soil | 980 | CY | 71.00 | 69,580 |
| 49 | | Sand profile at lawn | 942 | CY | 86.00 | 81,012 |
| 50 | | Clean pea gravel layer, 2" thick | 160 | CY | 100.00 | 16,000 |
| 51 | | Structural soil w/ underdrainage for trees in paving | 6,589 | CY | 150.00 | 988,350 |
| 52 | | Planting and bioretention planting under Planting/Landscaping section | | | | |
| 53 | | | | | | |
| 54 | | Misc earthwork & grading | 1 | LS | 100,000.00 | 100,000 |
| 55 | | | | | | |
| 56 | **2** | **Earthwork and Grading - Subtotal** | | | | **4,999,978** |
| 57 | | | | | | |
| 58 | | | | | | |
| 59 | **3** | **Site Materials/Paving** | | | | |
| 60 | | **Paving & Surfacing:** | | | | |
| 61 | | P1 CIP Concrete pedestrian paving, 4", heavy sandblast finish | 42,138 | SF | 22.00 | 927,036 |
| 62 | | P2 CIP Concrete pedestrian paving, 4", integral color, custom stamp pattern/etching | 2,567 | SF | 20.00 | 51,340 |
| 63 | | P3 Concrete unit paving Type 1 | 79,709 | SF | 22.00 | 1,753,598 |
| 64 | | P4 Concrete unit paving Type 2, vehicle rated | 37,522 | SF | 24.00 | 900,528 |
| 65 | | P5 Concrete unit paving Type 3 | None shown | | | |
| 66 | | P6 SCSP paving | None shown | | | |
| 67 | | P7 Terrazzo paving | None shown | | | |
| 68 | | P8 Stone paving | 83,720 | SF | 45.00 | 3,767,400 |
| 69 | | P9 Fountain paving | 9,986 | SF | 45.00 | 449,370 |
| 70 | | P10 Play surfacing | None shown | | | |
| 71 | | P11 Understory planting | See Planting/Landscaping | | | |
| 72 | | P12 Lawn | See Planting/Landscaping | | | |
| 73 | | Concrete sub-slab, 4" thick | 169,848 | SF | 7.30 | 1,239,890 |
| 74 | | Geofoam | 197 | CY | 260.00 | 51,220 |
| 75 | | | | | | |
| 76 | | **Site walls, stairs and ramps:** | | | | |
| 77 | | W1 CIP Concrete stepped edge w/ granite stone veneer | 4,340 | LF | 650.00 | 2,821,000 |
| 78 | | W2 CIP Concrete amphitheater seat | 752 | LF | 600.00 | 451,200 |
| 79 | | W3 CIP Concrete seat wall | 621 | LF | 370.00 | 229,770 |
| 80 | | W4 CIP Concrete sculpture garden wall | None shown | | | |
| 81 | | W5 CIP concrete seat wall | None shown | | | |
| 82 | | W6 CIP concrete art pedestal, 10'-6" x 6'-9" x 3' H | 2 | EA | 5,900.00 | 11,800 |
| 83 | | ADA sloped walks | 5,876 | SF | 25.00 | 146,900 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.1 ESTIMATE DETAILS - CIVIC CENTER PLAZA** **Date: 1/14/2019**

| Line | Tier | Component Description | 352,000 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 84 | | | | | | |
| 85 | | **Site elements & Structures** | | | | |
| 86 | | E1 Metal running bench | 990 | LF | 120.00 | 118,800 |
| 87 | | E2 Metal planting rail, bronze | 755 | LF | 500.00 | 377,500 |
| 88 | | E3 Custom wood bench | None shown | | | |
| 89 | | E4 Flag pole grove | None shown | | | |
| 90 | | E5 Granite bench | None shown | | | |
| 91 | | E6 Dog park fence | None shown | | | |
| 92 | | E7 Park bench | None shown | | | |
| 93 | | E8 Fitness equipment | None shown | | | |
| 94 | | E9 Custom chess tables and stools | None shown | | | |
| 95 | | E10 Community message board | None shown | | | |
| 96 | | E11 Overhead light fixtures | None shown | | | |
| 97 | | | | | | |
| 98 | | **Allowances (items not yet shown on drawings)** | | | | |
| 99 | | Water fountain, accessible | 4 | EA | 6,500.00 | 26,000 |
| 100 | | Water fountain, accessible, bottle refill | 2 | EA | 7,000.00 | 14,000 |
| 101 | | Piping for water fountains | 1,200 | LF | 20.00 | 24,000 |
| 102 | | Trenching | 1,200 | LF | 12.00 | 14,400 |
| 103 | | Trash receptacles, Landscape Forms or equal "Select Recycling System" trash and recycling double unit | 8 | EA | 3,100.00 | 24,800 |
| 104 | | | | | | |
| 105 | **3** | **Site Materials/Paving - Subtotal** | | | | **13,400,552** |
| 106 | | | | | | |
| 107 | | | | | | |
| 108 | **4** | **Planting/Landscaping** | | | | |
| 109 | | P11 Understory planting | 15,848 | SF | 15.00 | 237,720 |
| 110 | | Bioretention planting | 6,792 | SF | 16.00 | 108,672 |
| 111 | | P12 Lawn | 25,431 | SF | 1.40 | 35,603 |
| 112 | | Trees: | | | | |
| 113 | | 36" | 131 | EA | 900.00 | 117,900 |
| 114 | | 48" | 35 | EA | 2,200.00 | 77,000 |
| 115 | | 60" | 72 | EA | 4,300.00 | 309,600 |
| 116 | | 72" | 108 | EA | 6,600.00 | 712,800 |
| 117 | | 84" | 15 | EA | 9,000.00 | 135,000 |
| 118 | | Tree grates | 271 | EA | 2,000.00 | 542,000 |
| 119 | | Tree protection | 361 | EA | 150.00 | 54,150 |
| 120 | | | | | | |
| 121 | | Maintenance period | 6 | MTH | 5,000.00 | 30,000 |
| 122 | | | | | | |
| 123 | **4** | **Planting/Landscaping - Subtotal** | | | | **2,360,445** |
| 124 | | | | | | |
| 125 | | | | | | |
| 126 | **5** | **Irrigation** | | | | |
| 127 | | Irrigation at garden area | 15,848 | SF | 4.50 | 71,316 |
| 128 | | Irrigation at lawn, EPIC turf irrigation system | 25,431 | SF | 15.00 | 381,465 |
| 129 | | Irrigation at trees: | | | | |

| | | | 352,000 | gsf | | |
|---|---|---|---|---|---|---|
| **Line** | **Tier** | **Component Description** | **Quantity** | **Unit** | **Unit Cost** | **Estimated Cost** |
| 130 | | 36" | 131 | EA | 300.00 | 39,300 |
| 131 | | 48" | 35 | EA | 590.00 | 20,650 |
| 132 | | 60" | 72 | EA | 590.00 | 42,480 |
| 133 | | 72" | 108 | EA | 590.00 | 63,720 |
| 134 | | 84" | 15 | EA | 590.00 | 8,850 |
| 135 | | Irrigation controller | 1 | LS | 5,000.00 | 5,000 |
| 136 | | | | | | |
| 137 | **5** | **Irrigation - Subtotal** | | | | **632,781** |
| 138 | | | | | | |
| 139 | | | | | | |
| 140 | **6** | **Site Electrical & Site Lighting** | | | | |
| 141 | | Upgrade site electrical power | 1 | LS | 500,000.00 | 500,000 |
| 142 | | | | | | |
| 143 | | Site Lighting Fixtures | | | | |
| 144 | | Façade lighting (excluded) | | Excluded | | |
| 145 | | Mast lights | 2 | EA | 10,000.00 | 20,000 |
| 146 | | Pedestrians-Scale street lamps | 45 | EA | 3,500.00 | 157,500 |
| 147 | | Overhead light canopy | | None | | |
| 148 | | Garden/Intimate lighting | 20 | EA | 500.00 | 10,000 |
| 149 | | Paving - inset lights, 1/40SF typ | 333 | EA | 600.00 | 199,800 |
| 150 | | Entry thresholds, 1/30 LF typ | 31 | EA | 1,000.00 | 31,000 |
| 151 | | City Hall Lights (excluded) | | Excluded | | |
| 152 | | | | | | |
| 153 | | Conduits & cables including trenching, allowance | 12,930 | LF | 35.00 | 452,550 |
| 154 | | Infrastructure for temporary lighting | 352,000 | GSF | 0.05 | 17,600 |
| 155 | | | | | | |
| 156 | **6** | **Site Electrical & Site Lighting - Subtotal** | | | | **1,388,450** |
| 157 | | | | | | |
| 158 | | | | | | |
| 159 | **7** | **Non-potable Water Reuse** | | | | |
| 160 | | Non-potable water supply | 2,400 | LF | 100.00 | 240,000 |
| 161 | | Foundation drainage collection pipe | 430 | LF | 50.00 | 21,500 |
| 162 | | Emergency water storage tank | 1 | EA | 400,000.00 | 400,000 |
| 163 | | Public restroom | 2 | EA | 100,000.00 | 200,000 |
| 164 | | Fire cistern | 1 | EA | 100,000.00 | 100,000 |
| 165 | | | | | | |
| 166 | **7** | **Non-potable Water Reuse - Subtotal** | | | | **961,500** |
| 167 | | | | | | |
| 168 | | | | | | |
| 169 | **8** | **Surface Architectural Elements** | | | | |
| 170 | | CCPG access pavilion, say 3500 SF | 1 | EA | 5,250,000.00 | 5,250,000 |
| 171 | | WC at pavilion, 5 fixtures | 2 | EA | 150,000.00 | 300,000 |
| 172 | | Kiosk + stair including roof overhang & 140 SF active retail space | 3 | EA | 530,000.00 | 1,590,000 |
| 173 | | Public WC + stair | 1 | EA | 330,000.00 | 330,000 |
| 174 | | Grove Street pavilion, about 3000 SF, including 1500 SF active retail space | 1 | EA | 3,750,000.00 | 3,750,000 |

| Line | Tier | Component Description | 352,000 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 175 | | Bill Graham Civic Auditorium Pavilion with Canopy, about 4800 SF | 1 | EA | 2,400,000.00 | 2,400,000 |
| 176 | | | | | | |
| 177 | **8** | **Surface Architectural Elements - Subtotal** | | | | **13,620,000** |
| 178 | | | | | | |
| 179 | | | | | | |
| 180 | **9** | **Brooks Hall additional structure** | | | | |
| 181 | | Shotcrete at (E) concrete walls | | | | |
| 182 | | Formwork | 9,644 | SF | 22.00 | 212,168 |
| 183 | | Rebar, including dowels | 77,440 | LB | 1.70 | 131,648 |
| 184 | | Concrete material and placement | 359 | CY | 350.00 | 125,650 |
| 185 | | Concrete finishing | 9,644 | SF | 1.30 | 12,537 |
| 186 | | | | | | |
| 187 | | Site retaining walls at planters - see W3 CIP Concrete seat wall line item | | | | |
| 188 | | Geosynthetic drainage layer at site retaining walls | 2,484 | SF | 4.00 | 9,936 |
| 189 | | Drill holes for shotcrete placement near site retaining walls | 468 | EA | 150.00 | 70,200 |
| 190 | | Shotcrete at (E) wall slab "cells" near site retaining walls | | | | |
| 191 | | Formwork | 15,905 | SF | 22.00 | 349,910 |
| 192 | | Rebar | 4,118 | LB | 1.70 | 7,001 |
| 193 | | Concrete material and placement | 360 | CY | 350.00 | 126,000 |
| 194 | | Concrete finishing | 15,905 | SF | 1.30 | 20,677 |
| 195 | | Drill and epoxy grout at (E) wall slab "cells" | 3,744 | EA | 140.00 | 524,160 |
| 196 | | | | | | |
| 197 | | Roughen and provide shear keys next to beams | 305 | LF | 30.00 | 9,150 |
| 198 | | Beams at openings in (E) roof slab | | | | |
| 199 | | Formwork | 3,058 | SF | 22.00 | 67,276 |
| 200 | | Rebar | 6,710 | LB | 1.70 | 11,407 |
| 201 | | Concrete material and placement | 50 | CY | 350.00 | 17,500 |
| 202 | | Concrete finishing | 3,058 | SF | 1.30 | 3,975 |
| 203 | | Drill holes for shotcrete placement near beams | 230 | EA | 150.00 | 34,500 |
| 204 | | Shotcrete at (E) wall slab "cells" near beams | | | | |
| 205 | | Formwork | 7,817 | SF | 22.00 | 171,974 |
| 206 | | Rebar | 2,024 | LB | 1.70 | 3,441 |
| 207 | | Concrete material and placement | 177 | CY | 350.00 | 61,950 |
| 208 | | Concrete finishing | 7,817 | SF | 1.30 | 10,162 |
| 209 | | Drill and epoxy grout at (E) wall slab "cells" | 1,840 | EA | 140.00 | 257,600 |
| 210 | | | | | | |
| 211 | | Concrete pads at restroom/kiosk/housing structure (see Grove Street pavilion line item for cost that includes fixed base connection, cantilevers, custom shapes, composite framing, and AESS) and relocated flagpole/lighting/play structure | | | | |
| 212 | | Formwork | 1,050 | SF | 22.00 | 23,100 |
| 213 | | Rebar | 2,475 | LB | 1.70 | 4,208 |
| 214 | | Concrete material and placement | 18 | CY | 350.00 | 6,300 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.1 ESTIMATE DETAILS - CIVIC CENTER PLAZA** **Date: 1/14/2019**

| Line | Tier | Component Description | 352,000 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 215 | | Concrete finishing | 1,050 | SF | 1.30 | 1,365 |
| 216 | | Drill and epoxy grout at slab | 650 | EA | 140.00 | 91,000 |
| 217 | | Shotcrete at (E) wall slab "cells" near pads | | | | |
| 218 | | Formwork | 1,699 | SF | 22.00 | 37,378 |
| 219 | | Rebar | 440 | LB | 1.70 | 748 |
| 220 | | Concrete material and placement | 39 | CY | 350.00 | 13,650 |
| 221 | | Concrete finishing | 1,699 | SF | 1.30 | 2,209 |
| 222 | | Drill and epoxy grout at (E) wall slab "cells" | 400 | EA | 140.00 | 56,000 |
| 223 | | | | | | |
| 224 | | See Bill Graham Civic Auditorium Pavilion with Canopy line item for Grove Street at Bill Graham Auditorium scope of work | | | | |
| 225 | | | | | | |
| 226 | **9** | **Brooks Hall additional structure - Subtotal** | | | | **2,474,779** |
| 227 | | | | | | |
| 228 | | | | | | |
| 229 | **10** | **Civic Center Parking Garage** | SEE SEPARATE BREAKOUT | | | |
| 230 | | | | | | |
| 231 | | | | | | |
| 232 | **11** | **Other Below-grade Structures** | NONE | | | |
| 233 | | | | | | |
| 234 | | | | | | |
| 235 | **12** | **Public Art Allowance** | | | | |
| 236 | | Public art, allow, at 1% | 1 | LS | 426,100.00 | 426,100 |
| 237 | | | | | | |
| 238 | **12** | **Public Art Allowance - Subtotal** | | | | **426,100** |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.2 ESTIMATE DETAILS - FULTON MALL** **Date: 1/14/2019**

| Line | Tier | Component Description | 128,000 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 1 | **1** | **Demolition/Existing Conditions** | | | | |
| 2 | 1.1 | Existing Elements to Remain or Relocate - site level | | | | |
| 3 | | Pioneer Monument, protect and relocate per conservation standards | 1 | AL | 5,000,000.00 | 5,000,000 |
| 4 | | Ashurbanipal Statue (south of Museum entrance on Fulton St) – protect in place | 1 | EA | 600.00 | 600 |
| 5 | | Fire box – protect in place | 1 | EA | 200.00 | 200 |
| 6 | | Traffic control box – protect in place | 1 | EA | 200.00 | 200 |
| 7 | | 6" Granite curb (south side of Fulton St travelway, east side of Larkin St travelway) – salvage for reuse | 966 | LF | 15.00 | 14,490 |
| 8 | | Street Lights – protect in place | 2 | EA | 100.00 | 200 |
| 9 | | Live utilities discovered that were not indicated previously- protected in place and removed only at the direction of CCSF. | 1 | AL | 10,000.00 | 10,000 |
| 10 | | | | | | |
| 11 | 1.2 | Existing Elements to Remain - Library and Museum Terraces | | | | |
| 12 | | Museum Terrace steps – protect in place | 1 | EA | 2,000.00 | 2,000 |
| 13 | | Museum Terrace outer granite retaining wall – protect in place | 351 | LF | 25.00 | 8,775 |
| 14 | | Library Terrace – refer to architectural section | | | | |
| 15 | | | | | | |
| 16 | 1.3 | Demolition | | | | |
| 17 | | Concrete paving | 58,946 | SF | 4.00 | 235,784 |
| 18 | | Street paving | 38,887 | SF | 3.00 | 116,661 |
| 19 | | Steps - salvage | 351 | LF | 50.00 | 17,550 |
| 20 | | Low wall | 1,570 | SF | 25.00 | 39,250 |
| 21 | | Wall | 2,544 | SF | 30.00 | 76,320 |
| 22 | | Handrail | 25 | LF | 20.00 | 500 |
| 23 | | Planting area | 12,354 | SF | 1.60 | 19,766 |
| 24 | | Hedge | 1,438 | SF | 1.80 | 2,588 |
| 25 | | Trees including stumps | 58 | EA | 500.00 | 29,000 |
| 26 | | Site elements | 8 | EA | 500.00 | 4,000 |
| 27 | | Existing mechanical vents - abandon | 4 | EA | 500.00 | 2,000 |
| 28 | | Footings for lights | 18 | EA | 800.00 | 14,400 |
| 29 | | | | | | |
| 30 | **1** | **Demolition/Existing Conditions - Subtotal** | | | | **5,594,285** |
| 31 | | | | | | |
| 32 | | | | | | |
| 33 | **2** | **Earthwork and Grading** | | | | |
| 34 | | Grading: change of +/- 7 feet, terraced from Larkin Street down to Hyde Street | | | | |
| 35 | | Cut | 4,148 | CY | 26.00 | 107,848 |
| 36 | | Fill from cut | 4,148 | CY | 32.00 | 132,736 |
| 37 | | Aggregate base under pedestrian paving | 685 | CY | 66.00 | 45,210 |
| 38 | | Waterproofing | 28,370 | SF | 10.00 | 283,700 |
| 39 | | Landscape drainage | 18,852 | SF | 2.00 | 37,704 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.2 ESTIMATE DETAILS - FULTON MALL** **Date: 1/14/2019**

| Line | Tier | Component Description | 128,000 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 40 | | Storm water treatment | | | | |
| 41 | | Infiltration basin, 2.7 acres | 117,612 | SF | 36.00 | 4,234,032 |
| 42 | | Subsurface piping | 117,612 | SF | 10.00 | 1,176,120 |
| 43 | | Over-structure soil preparation, assume import | 2,750 | SF | 2.25 | 6,188 |
| 44 | | Native soil preparation in tree planting areas, 4' deep | 11,384 | SF | 12.00 | 136,608 |
| 45 | | Native soil preparation in all other areas, 2' deep | 22,859 | SF | 6.00 | 137,154 |
| 46 | | Planting soil for trees in planting areas | 85 | CY | 71.00 | 6,035 |
| 47 | | Understory planting soil | 362 | CY | 71.00 | 25,702 |
| 48 | | Sand profile at lawn | 630 | CY | 86.00 | 54,180 |
| 49 | | Clean pea gravel layer, 2" thick | 107 | CY | 100.00 | 10,700 |
| 50 | | Structural soil w/ underdrainage for trees in paving | 2,590 | CY | 150.00 | 388,500 |
| 51 | | Planting under Planting/Landscaping section | | | | |
| 52 | | | | | | |
| 53 | | Misc earthwork & grading | 1 | LS | 150,000.00 | 150,000 |
| 54 | | | | | | |
| 55 | **2** | **Earthwork and Grading - Subtotal** | | | | **6,932,417** |
| 56 | | | | | | |
| 57 | | | | | | |
| 58 | **3** | **Site Materials/Paving** | | | | |
| 59 | | **Paving & Surfacing:** | | | | |
| 60 | | P1 CIP Concrete pedestrian paving, 4", heavy sandblast finish | 17,986 | SF | 22.00 | 395,692 |
| 61 | | P2 CIP Concrete pedestrian paving, 4", integral color, custom stamp pattern/etching | 1,202 | SF | 20.00 | 24,040 |
| 62 | | P3 Concrete unit paving Type 1 | 26,648 | SF | 22.00 | 586,256 |
| 63 | | P4 Concrete unit paving Type 2, vehicle rated | None shown | | | |
| 64 | | P5 Concrete unit paving Type 3 | None shown | | | |
| 65 | | P6 SCSP paving | None shown | | | |
| 66 | | P7 Terrazzo paving | None shown | | | |
| 67 | | P8 Stone paving | 31,683 | SF | 45.00 | 1,425,735 |
| 68 | | P9 Fountain paving | None shown | | | |
| 69 | | P10 Play surfacing | None shown | | | |
| 70 | | P11 Understory planting | See Planting/Landscaping | | | |
| 71 | | P12 Lawn | See Planting/Landscaping | | | |
| 72 | | Concrete sub-slab, 4" thick | 39,347 | SF | 7.30 | 287,233 |
| 73 | | Sloped walk | 3,412 | SF | 20.00 | 68,240 |
| 74 | | Geofoam | 164 | CY | 260.00 | 42,640 |
| 75 | | Misc. concrete paving, allow | 8,090 | SF | 15.00 | 121,350 |
| 76 | | | | | | |
| 77 | | **Site walls, stairs and ramps:** | | | | |
| 78 | | W1 CIP Concrete stepped edge w/ granite stone veneer | None shown | | | |
| 79 | | W2 CIP Concrete amphitheater seat | 482 | LF | 600.00 | 289,200 |
| 80 | | W3 CIP Concrete seat wall | None shown | | | |
| 81 | | W4 CIP Concrete sculpture garden wall | 539 | LF | 360.00 | 194,040 |
| 82 | | W5 CIP concrete seat wall | None shown | | | |
| 83 | | W6 CIP concrete art pedestal, 7'-10" x 5'-7" x 3' H | 2 | EA | 3,800.00 | 7,600 |
| 84 | | W6 CIP concrete art pedestal, oval, 53 sf, 2' H | 2 | EA | 4,200.00 | 8,400 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.2 ESTIMATE DETAILS - FULTON MALL** **Date: 1/14/2019**

| | | | 128,000 | gsf | | |
|---|---|---|---|---|---|---|
| **Line** | **Tier** | **Component Description** | **Quantity** | **Unit** | **Unit Cost** | **Estimated Cost** |
| 85 | | Concrete stairs, 5'-5" W, 2 risers | 1 | EA | 3,500.00 | 3,500 |
| 86 | | Concrete stairs, 5'-5" W, 3 risers | 1 | EA | 5,300.00 | 5,300 |
| 87 | | Misc. concrete walls, allow | 712 | LF | 300.00 | 213,600 |
| 88 | | | | | | |
| 89 | | **Site elements & Structures** | | | | |
| 90 | | E1 Metal running bench | None shown | | | |
| 91 | | E2 Metal planting rail, bronze | None shown | | | |
| 92 | | E3 Custom wood bench | None shown | | | |
| 93 | | E4 Flag pole grove | | | | |
| 94 | | Paving | 1,648 | SF | 20.00 | 32,960 |
| 95 | | CIP concrete footings for relocated flagpoles | 18 | EA | 1,000.00 | 18,000 |
| 96 | | E5 Granite bench | 243 | LF | 300.00 | 72,900 |
| 97 | | E6 Dog park fence | None shown | | | |
| 98 | | E7 Park bench | None shown | | | |
| 99 | | E8 Fitness equipment | None shown | | | |
| 100 | | E9 Custom chess tables and stools | None shown | | | |
| 101 | | E10 Community message board | None shown | | | |
| 102 | | E11 Overhead light fixtures | None shown | | | |
| 103 | | | | | | |
| 104 | | **Allowances (items not yet shown on drawings)** | | | | |
| 105 | | Water fountain, accessible | 1 | EA | 6,500.00 | 6,500 |
| 106 | | Water fountain, accessible, bottle refill | 1 | EA | 7,000.00 | 7,000 |
| 107 | | Piping for water fountains | 400 | LF | 20.00 | 8,000 |
| 108 | | Trenching | 400 | LF | 12.00 | 4,800 |
| 109 | | Trash receptacles, Landscape Forms or equal "Select Recycling System" trash and recycling double unit | 4 | EA | 3,100.00 | 12,400 |
| 110 | | | | | | |
| 111 | **3** | **Site Materials/Paving - Subtotal** | | | | **3,835,386** |
| 112 | | | | | | |
| 113 | | | | | | |
| 114 | **4** | **Planting/Landscaping** | | | | |
| 115 | | P11 Understory planting | 5,855 | SF | 15.00 | 87,825 |
| 116 | | P12 Lawn | 17,004 | SF | 1.40 | 23,806 |
| 117 | | Misc. planting, allow | 2,750 | SF | 15.00 | 41,250 |
| 118 | | Trees: | | | | |
| 119 | | 36" | 18 | EA | 900.00 | 16,200 |
| 120 | | 60" | 80 | EA | 4,300.00 | 344,000 |
| 121 | | 84" | 7 | EA | 9,000.00 | 63,000 |
| 122 | | Tree grates | 98 | EA | 2,000.00 | 196,000 |
| 123 | | Tree protection | 105 | EA | 150.00 | 15,750 |
| 124 | | | | | | |
| 125 | | Maintenance period | 6 | MTH | 3,000.00 | 18,000 |
| 126 | | | | | | |
| 127 | **4** | **Planting/Landscaping - Subtotal** | | | | **805,831** |
| 128 | | | | | | |
| 129 | | | | | | |
| 130 | **5** | **Irrigation** | | | | |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.2 ESTIMATE DETAILS - FULTON MALL** **Date: 1/14/2019**

| | | | 128,000 | gsf | | |
|---|---|---|---|---|---|---|
| **Line** | **Tier** | **Component Description** | **Quantity** | **Unit** | **Unit Cost** | **Estimated Cost** |
| 131 | | Irrigation at garden area | 5,855 | SF | 5.00 | 29,275 |
| 132 | | Irrigation at lawn, EPIC turf irrigation system | 17,004 | SF | 15.00 | 255,060 |
| 133 | | Irrigation at trees: | | | | |
| 134 | | 36" | 18 | EA | 300.00 | 5,400 |
| 135 | | 60" | 80 | EA | 590.00 | 47,200 |
| 136 | | 84" | 7 | EA | 590.00 | 4,130 |
| 137 | | Irrigation controller | 1 | LS | 3,000.00 | 3,000 |
| 138 | | | | | | |
| 139 | **5** | **Irrigation - Subtotal** | | | | **344,065** |
| 140 | | | | | | |
| 141 | | | | | | |
| 142 | **6** | **Site Electrical & Site Lighting** | | | | |
| 143 | | Upgrade site electrical power | 1 | LS | 300,000.00 | 300,000 |
| 144 | | | | | | |
| 145 | | Site Lighting Fixtures | | | | |
| 146 | | Façade lighting (excluded) | | Excluded | | |
| 147 | | Mast lights | | None | | |
| 148 | | Pedestrians-Scale street lamps | 24 | EA | 3,500.00 | 84,000 |
| 149 | | Overhead light canopy | | None | | |
| 150 | | Garden/Intimate lighting | | None | | |
| 151 | | Paving - inset lights, 1/40SF typ | | None | | |
| 152 | | Entry thresholds, 1/30 LF typ | 42 | EA | 1,200.00 | 50,400 |
| 153 | | City Hall Lights (excluded) | | Excluded | | |
| 154 | | | | | | |
| 155 | | Conduits & cables including trenching, allowance | 1,980 | LF | 35.00 | 69,300 |
| 156 | | | | | | |
| 157 | **6** | **Site Electrical & Site Lighting - Subtotal** | | | | **503,700** |
| 158 | | | | | | |
| 159 | | | | | | |
| 160 | **7** | **Non-potable Water Reuse** | | | | |
| 161 | | Non-potable water supply | 1,200 | LF | 100.00 | 120,000 |
| 162 | | Public restroom | 1 | EA | 100,000.00 | 100,000 |
| 163 | | | | | | |
| 164 | **7** | **Non-potable Water Reuse - Subtotal** | | | | **220,000** |
| 165 | | | | | | |
| 166 | | | | | | |
| 167 | **8** | **Surface Architectural Elements** | | | | |
| 168 | | Library pavilion, about 1000 SF/EA | 2 | EA | 1,500,000.00 | 3,000,000 |
| 169 | | WC at pavilion, 6 fixtures | 2 | EA | 180,000.00 | 360,000 |
| 170 | | Kiosk, about 500 SF | 1 | EA | 750,000.00 | 750,000 |
| 171 | | | | | | |
| 172 | **8** | **Surface Architectural Elements - Subtotal** | | | | **4,110,000** |
| 173 | | | | | | |
| 174 | | | | | | |
| 175 | **9** | **Brooks Hall additional structure** | | NONE | | |
| 176 | | | | | | |
| 177 | | | | | | |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.2 ESTIMATE DETAILS - FULTON MALL** **Date: 1/14/2019**

| Line | Tier | Component Description | 128,000 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 178 | **10** | **Civic Center Parking Garage** | | NONE | | |
| 179 | | | | | | |
| 180 | | | | | | |
| 181 | **11** | **Other Below-grade Structures** | | | | |
| 182 | | Cut and retrofit (E) steel trusses | | | | |
| 183 | | Shoring | 1,080 | SF | 90.00 | 97,200 |
| 184 | | Cut truss (1) bay from wall to vertical W14x48 strut | 12 | LOC | 500.00 | 6,000 |
| 185 | | Field weld doubler and stiffener plates along 7' height of vertical W14x48 strut | 12 | LOC | 2,400.00 | 28,800 |
| 186 | | Steel bearing columns | 10,800 | LB | 10.00 | 108,000 |
| 187 | | Shear studs for steel bearing columns | 12 | LOC | 200.00 | 2,400 |
| 188 | | Concrete columns, 36"x36" | 36 | CY | 4,500.00 | 162,000 |
| 189 | | Footings for columns | | | | |
| 190 | | Formwork | 576 | SF | 22.00 | 12,672 |
| 191 | | Rebar | 8,400 | LB | 1.70 | 14,280 |
| 192 | | Concrete material and placement | 23 | CY | 350.00 | 8,050 |
| 193 | | Concrete finishing | 576 | SF | 1.30 | 749 |
| 194 | | Concrete planter basin | | | | |
| 195 | | Formwork | 6,048 | SF | 22.00 | 133,056 |
| 196 | | Steel | 19,656 | LB | 1.70 | 33,415 |
| 197 | | Concrete material and placement | 93 | CY | 350.00 | 32,550 |
| 198 | | Concrete finishing | 6,048 | SF | 1.30 | 7,862 |
| 199 | | Drill and epoxy grout into (E) concrete | 3,024 | EA | 140.00 | 423,360 |
| 200 | | | | | | |
| 201 | | See Surface Architectural Elements for Proposed Surface Structure scope of work in Fulton Mall | | | | |
| 202 | | | | | | |
| 203 | **11** | **Other Below-grade Structures - Subtotal** | | | | **1,070,394** |
| 204 | | | | | | |
| 205 | | | | | | |
| 206 | **12** | **Public Art Allowance** | | | | |
| 207 | | Public art, allow, at 1% | 1 | LS | 234,200.00 | 234,200 |
| 208 | | | | | | |
| 209 | **12** | **Public Art Allowance - Subtotal** | | | | **234,200** |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.3 ESTIMATE DETAILS - UN PLAZA** **Date: 1/14/2019**

| Line | Tier | Component Description | 89,500 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 1 | **1** | **Demolition/Existing Conditions** | | | | |
| 2 | 1.1 | Existing Elements to Remain or Relocate | | | | |
| 3 | | Simon Bolivar Monument - protect and relocate to Grove Street as per conservation standards | 1 | AL | 1,000,000.00 | 1,000,000 |
| 4 | | (16) Granite columns - protect in place | 16 | EA | 200.00 | 3,200 |
| 5 | | (1) UN monument obelisk - protect in place | 1 | EA | 200.00 | 200 |
| 6 | | 6” Granite curb (east side of Hyde Street) – salvage for reuse | 248 | LF | 15.00 | 3,720 |
| 7 | | (2) Flag poles with grates - protect in place | 2 | EA | 300.00 | 600 |
| 8 | | (9) Bronze tree grates – salvage for reuse | 9 | EA | 100.00 | 900 |
| 9 | | (E) Granite Bands with inscriptions (total of 7) at center of plaza - remove and protect for re-installation with new paving | 7 | EA | 400.00 | 2,800 |
| 10 | | (E) Granite meridians - remove and protect for re-installation with new paving | 2 | EA | 400.00 | 800 |
| 11 | | 50 UN Plaza: | | | | |
| 12 | | Existing steps at SE corner - to be replaced in kind | 198 | LF | 350.00 | 69,300 |
| 13 | | Bollards at front door on south façade and SW corner - to be replaced in kind | 8 | EA | 2,000.00 | 16,000 |
| 14 | | Live utilities discovered that were not indicated previously- protected in place and removed only at the direction of CCSF. | 1 | AL | 6,000.00 | 6,000 |
| 15 | | | | | | |
| 16 | 1.2 | Demolition | | | | |
| 17 | | Concrete paving | 708 | SF | 4.00 | 2,832 |
| 18 | | Brick paving | 59,556 | SF | 4.00 | 238,224 |
| 19 | | Planter edges | 1,638 | LF | 3.00 | 4,914 |
| 20 | | Planting area | 20,254 | SF | 1.60 | 32,406 |
| 21 | | Trees including stumps | 63 | EA | 250.00 | 15,750 |
| 22 | | Site elements | 5 | EA | 500.00 | 2,500 |
| 23 | | Footings for lights | 1 | EA | 800.00 | 800 |
| 24 | | | | | | |
| 25 | **1** | **Demolition/Existing Conditions - Subtotal** | | | | **1,400,946** |
| 26 | | | | | | |
| 27 | | | | | | |
| 28 | **2** | **Earthwork and Grading** | | | | |
| 29 | | Rough grading | 89,500 | SF | 0.50 | 44,750 |
| 30 | | Fine grading | 89,500 | SF | 1.00 | 89,500 |
| 31 | | Aggregate base under pedestrian paving | 880 | CY | 66.00 | 58,080 |
| 32 | | Landscape drainage | 12,152 | SF | 1.00 | 12,152 |
| 33 | | Storm water treatment | See Leavenworth | | | |
| 34 | | Native soil preparation in tree planting areas, 4' deep | 12,152 | SF | 12.00 | 145,824 |
| 35 | | Structural soil w/ underdrainage for trees in paving | 1,800 | CY | 150.00 | 270,000 |
| 36 | | Planting and bioretention planting under Planting/Landscaping section | | | | |
| 37 | | | | | | |
| 38 | | Misc earthwork & grading | 1 | LS | 12,000.00 | 12,000 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.3 ESTIMATE DETAILS - UN PLAZA** **Date: 1/14/2019**

| Line | Tier | Component Description | 89,500 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 39 | | | | | | |
| 40 | **2** | **Earthwork and Grading - Subtotal** | | | | **632,306** |
| 41 | | | | | | |
| 42 | | | | | | |
| 43 | **3** | **Site Materials/Paving** | | | | |
| 44 | | **Paving & Surfacing:** | | | | |
| 45 | | P1 CIP Concrete pedestrian paving, 4", heavy sandblast finish | None shown | | | |
| 46 | | P2 CIP Concrete pedestrian paving, 4", integral color, custom stamp pattern/etching | 15,585 | SF | 20.00 | 311,700 |
| 47 | | P3 Concrete unit paving Type 1 | 16,758 | SF | 22.00 | 368,676 |
| 48 | | P4 Concrete unit paving Type 2, vehicle rated | None shown | | | |
| 49 | | P5 Concrete unit paving Type 3 | 15,166 | SF | 22.00 | 333,652 |
| 50 | | P6 SCSP paving | None shown | | | |
| 51 | | P7 Terrazzo paving | None shown | | | |
| 52 | | P8 Stone paving | 30,582 | SF | 45.00 | 1,376,190 |
| 53 | | P9 Fountain paving | None shown | | | |
| 54 | | P10 Play surfacing | None shown | | | |
| 55 | | P11 Understory planting | See Planting/Landscaping | | | |
| 56 | | P12 Lawn | None shown | | | |
| 57 | | Concrete sub-slab, 4" thick | None shown | | | |
| 58 | | | | | | |
| 59 | | **Site walls, stairs and ramps:** | | | | |
| 60 | | W1 CIP Concrete stepped edge w/ granite stone veneer | None shown | | | |
| 61 | | W2 CIP Concrete amphitheater seat | None shown | | | |
| 62 | | W3 CIP Concrete seat wall | None shown | | | |
| 63 | | W4 CIP Concrete sculpture garden wall | None shown | | | |
| 64 | | W5 CIP concrete seat wall | None shown | | | |
| 65 | | W6 CIP concrete art pedestal, 10'-6" x 6'-9" x 3' H | None shown | | | |
| 66 | | | | | | |
| 67 | | **Site elements & Structures** | | | | |
| 68 | | E1 Metal running bench | None shown | | | |
| 69 | | E2 Metal planting rail, bronze | None shown | | | |
| 70 | | E3 Custom wood bench, smaller type | 9 | EA | 2,500.00 | 22,500 |
| 71 | | E3 Custom wood bench, larger type | 12 | EA | 4,000.00 | 48,000 |
| 72 | | E4 Flag pole grove | None shown | | | |
| 73 | | E5 Granite bench | None shown | | | |
| 74 | | E6 Dog park fence | None shown | | | |
| 75 | | E7 Park bench | None shown | | | |
| 76 | | E8 Fitness equipment | None shown | | | |
| 77 | | E9 Custom chess tables and stools | None shown | | | |
| 78 | | E10 Community message board | None shown | | | |
| 79 | | E11 Overhead light fixtures | See Site Electrical | | | |
| 80 | | | | | | |
| 81 | | **Allowances (items not yet shown on drawings)** | | | | |
| 82 | | Water fountain | 1 | EA | 6,000.00 | 6,000 |
| 83 | | Water fountain, accessible | 1 | EA | 6,500.00 | 6,500 |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.3 ESTIMATE DETAILS - UN PLAZA** **Date: 1/14/2019**

| Line | Tier | Component Description | 89,500 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 84 | | Water fountain, accessible, bottle refill | 1 | EA | 7,000.00 | 7,000 |
| 85 | | Piping for water fountains | 600 | LF | 20.00 | 12,000 |
| 86 | | Trenching | 600 | LF | 12.00 | 7,200 |
| 87 | | Trash receptacles, Landscape Forms or equal "Select Recycling System" trash and recycling double unit | 8 | EA | 3,100.00 | 24,800 |
| 88 | | Bollards | 10 | EA | 2,000.00 | 20,000 |
| 89 | | | | | | |
| 90 | **3** | **Site Materials/Paving - Subtotal** | | | | **2,544,218** |
| 91 | | | | | | |
| 92 | | | | | | |
| 93 | **4** | **Planting/Landscaping** | | | | |
| 94 | | P11 Understory planting | None shown | | | |
| 95 | | Bioretention planting | None shown | | | |
| 96 | | P12 Lawn | None shown | | | |
| 97 | | Trees: | | | | |
| 98 | | 60" | 61 | EA | 4,300.00 | 262,300 |
| 99 | | 84" | 1 | EA | 9,000.00 | 9,000 |
| 100 | | Tree grates | 62 | EA | 2,000.00 | 124,000 |
| 101 | | Tree protection | 62 | EA | 150.00 | 9,300 |
| 102 | | | | | | |
| 103 | | Maintenance period | 6 | MTH | 1,800.00 | 10,800 |
| 104 | | | | | | |
| 105 | **4** | **Planting/Landscaping - Subtotal** | | | | **415,400** |
| 106 | | | | | | |
| 107 | | | | | | |
| 108 | **5** | **Irrigation** | | | | |
| 109 | | Irrigation at trees: | | | | |
| 110 | | 60" | 61 | EA | 590.00 | 35,990 |
| 111 | | 84" | 1 | EA | 590.00 | 590 |
| 112 | | Irrigation controller | 1 | LS | 1,800.00 | 1,800 |
| 113 | | | | | | |
| 114 | **5** | **Irrigation - Subtotal** | | | | **38,380** |
| 115 | | | | | | |
| 116 | | | | | | |
| 117 | **6** | **Site Electrical & Site Lighting** | | | | |
| 118 | | Upgrade site electrical power | 1 | LS | 200,000.00 | 200,000 |
| 119 | | | | | | |
| 120 | | Site Lighting Fixtures | | | | |
| 121 | | Façade lighting (excluded) | Excluded | | | |
| 122 | | Mast lights | None | | | |
| 123 | | Pedestrians-Scale street lamps | 11 | EA | 3,500.00 | 38,500 |
| 124 | | Overhead light canopy | None | | | |
| 125 | | Garden/Intimate lighting | None | | | |
| 126 | | Paving - inset lights, 1/40SF typ | None | | | |
| 127 | | Entry thresholds, 1/30 LF typ | None | | | |
| 128 | | City Hall Lights (excluded) | Excluded | | | |
| 129 | | | | | | |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.3 ESTIMATE DETAILS - UN PLAZA** **Date: 1/14/2019**

| Line | Tier | Component Description | 89,500 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 130 | | Conduits & cables including trenching, allowance | 330 | LF | 35.00 | 11,550 |
| 131 | | | | | | |
| 132 | **6** | **Site Electrical & Site Lighting - Subtotal** | | | | **250,050** |
| 133 | | | | | | |
| 134 | | | | | | |
| 135 | **7** | **Non-potable Water Reuse** | | | | |
| 136 | | Non-potable water supply | 510 | LF | 100.00 | 51,000 |
| 137 | | | | | | |
| 138 | **7** | **Non-potable Water Reuse - Subtotal** | | | | **51,000** |
| 139 | | | | | | |
| 140 | | | | | | |
| 141 | **8** | **Surface Architectural Elements** | | | | |
| 142 | | BART Market structure, about 8000 SF, a new ground-up 2-story structure to enclose the existing BART stair and escalator well | 1 | EA | 9,600,000.00 | 9,600,000 |
| 143 | | Includes only elements above grade and foundation. Specifically excludes escalators, stairs, elevators and any other elements below grade | | | | |
| 144 | | | | | | |
| 145 | **8** | **Surface Architectural Elements - Subtotal** | | | | **9,600,000** |
| 146 | | | | | | |
| 147 | | | | | | |
| 148 | **9** | **Brooks Hall additional structure** | | NONE | | |
| 149 | | | | | | |
| 150 | | | | | | |
| 151 | **10** | **Civic Center Parking Garage** | | NONE | | |
| 152 | | | | | | |
| 153 | | | | | | |
| 154 | **11** | **Other Below-grade Structures** | | | | |
| 155 | | Infill (E) street level elevator opening | 1 | EA | 10,400.00 | 10,400 |
| 156 | | (N) elevator opening | 1 | EA | 14,800.00 | 14,800 |
| 157 | | "Lightwell" type opening, about 1600 SF | | | | |
| 158 | | Earthwork | 593 | CY | 200.00 | 118,600 |
| 159 | | Base slab | 1,600 | SF | 80.00 | 128,000 |
| 160 | | Shoring | 1,580 | SF | 90.00 | 142,200 |
| 161 | | Wall | 1,580 | SF | 150.00 | 237,000 |
| 162 | | Misc. items | 1 | LS | 100,000.00 | 100,000 |
| 163 | | | | | | |
| 164 | | See BART Market structure line item for Market Structure scope of work | | | | |
| 165 | | | | | | |
| 166 | **11** | **Other Below-grade Structures - Subtotal** | | | | **751,000** |
| 167 | | | | | | |
| 168 | | | | | | |
| 169 | **12** | **Public Art Allowance** | | | | |
| 170 | | Public art, allow, at 1% | 1 | LS | 156,800.00 | 156,800 |
| 171 | | | | | | |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.3 ESTIMATE DETAILS - UN PLAZA** **Date: 1/14/2019**

| | | | 89,500 | gsf | | |
|---|---|---|---|---|---|---|
| **Line** | **Tier** | **Component Description** | **Quantity** | **Unit** | **Unit Cost** | **Estimated Cost** |
| 172 | **12** | **Public Art Allowance - Subtotal** | | | | **156,800** |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.4 ESTIMATE DETAILS - LEAVENWORTH** **Date: 1/14/2019**

| Line | Tier | Component Description | 40,600 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 1 | **1** | **Demolition/Existing Conditions** | | | | |
| 2 | 1.1 | Existing Elements to Remain or Relocate | | | | |
| 3 | | Existing fountain - protect at perimeter during demolition | 1 | EA | 5,300.00 | 5,300 |
| 4 | | 6” Granite curb (east side of Leavenworth) – salvage for reuse | 178 | LF | 15.00 | 2,670 |
| 5 | | (2) Mast Lights - gold spotlight poles with 12 lamps - protect in place | 2 | EA | 300.00 | 600 |
| 6 | | (11) Bronze tree grates – salvage for reuse | 11 | EA | 100.00 | 1,100 |
| 7 | | 50 UN Plaza - relocate fence | 110 | LF | 25.00 | 2,750 |
| 8 | | Live utilities discovered that were not indicated previously- protected in place and removed only at the direction of CCSF. | 1 | AL | 10,000.00 | 10,000 |
| 9 | | | | | | |
| 10 | 1.2 | Demolition | | | | |
| 11 | | Concrete paving | 2,935 | SF | 4.00 | 11,740 |
| 12 | | Brick paving | 27,535 | SF | 4.00 | 110,140 |
| 13 | | Planter edges | 471 | LF | 3.00 | 1,413 |
| 14 | | Planting area | 4,592 | SF | 1.60 | 7,347 |
| 15 | | Trees including stumps | 25 | EA | 250.00 | 6,250 |
| 16 | | Site elements | 3 | EA | 500.00 | 1,500 |
| 17 | | Footings for lights | 9 | EA | 800.00 | 7,200 |
| 18 | | | | | | |
| 19 | **1** | **Demolition/Existing Conditions - Subtotal** | | | | **168,010** |
| 20 | | | | | | |
| 21 | | | | | | |
| 22 | **2** | **Earthwork and Grading** | | | | |
| 23 | | Rough grading | 40,600 | SF | 0.50 | 20,300 |
| 24 | | Fine grading | 40,600 | SF | 1.00 | 40,600 |
| 25 | | Aggregate base under pedestrian paving | 393 | CY | 66.00 | 25,938 |
| 26 | | Landscape drainage | 7,448 | SF | 1.00 | 7,448 |
| 27 | | Storm water treatment | | | | |
| 28 | | Bioretention area, 30% of understory planting | 1,125 | sf-key qty | | |
| 29 | | Gravel mulch, 3" thick | 1,125 | SF | 2.40 | 2,700 |
| 30 | | Soil, 18" thick | 63 | CY | 160.00 | 10,000 |
| 31 | | Aggregate base, 12" thick | 42 | CY | 66.00 | 2,772 |
| 32 | | Impervious membrane | 1,125 | SF | 1.00 | 1,125 |
| 33 | | Underdrain | 1,125 | SF | 1.50 | 1,688 |
| 34 | | Overflow drain | 1 | EA | 2,000.00 | 2,000 |
| 35 | | Native soil preparation in tree planting areas, 4' deep | 7,448 | SF | 12.00 | 89,376 |
| 36 | | Native soil preparation in all other areas, 2' deep | 2,947 | SF | 6.00 | 17,682 |
| 37 | | Planting soil for trees in planting areas | 97 | CY | 71.00 | 6,887 |
| 38 | | Understory planting soil | 113 | CY | 71.00 | 8,023 |
| 39 | | Structural soil w/ underdrainage for trees in paving | 871 | CY | 150.00 | 130,650 |
| 40 | | Planting and bioretention planting under Planting/Landscaping section | | | | |
| 41 | | | | | | |
| 42 | | Misc earthwork & grading | 1 | LS | 8,000.00 | 8,000 |

| Line | Tier | Component Description | 40,600 gsf Quantity | Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 43 | | | | | | |
| 44 | **2** | **Earthwork and Grading - Subtotal** | | | | **375,189** |
| 45 | | | | | | |
| 46 | | | | | | |
| 47 | **3** | **Site Materials/Paving** | | | | |
| 48 | | **Paving & Surfacing:** | | | | |
| 49 | | P1 CIP Concrete pedestrian paving, 4", heavy sandblast finish | None shown | | | |
| 50 | | P2 CIP Concrete pedestrian paving, 4", integral color, custom stamp pattern/etching | None shown | | | |
| 51 | | P3 Concrete unit paving Type 1 | None shown | | | |
| 52 | | P4 Concrete unit paving Type 2, vehicle rated | None shown | | | |
| 53 | | P5 Concrete unit paving Type 3 | 16,835 | SF | 22.00 | 370,370 |
| 54 | | P6 SCSP paving | 2,314 | SF | 8.20 | 18,975 |
| 55 | | P7 Terrazzo paving | 11,002 | SF | 30.00 | 330,060 |
| 56 | | P8 Stone paving | None shown | | | |
| 57 | | P9 Fountain paving | 199 | SF | 45.00 | 8,955 |
| 58 | | P10 Play surfacing | 2,076 | SF | 28.00 | 58,128 |
| 59 | | P11 Understory planting | See Planting/Landscaping | | | |
| 60 | | P12 Lawn | None shown | | | |
| 61 | | Concrete sub-slab, 4" thick | 11,002 | SF | 7.30 | 80,315 |
| 62 | | | | | | |
| 63 | | **Site walls, stairs and ramps:** | | | | |
| 64 | | W1 CIP Concrete stepped edge w/ granite stone veneer | None shown | | | |
| 65 | | W2 CIP Concrete amphitheater seat | None shown | | | |
| 66 | | W3 CIP Concrete seat wall | 112 | LF | 370.00 | 41,440 |
| 67 | | W4 CIP Concrete sculpture garden wall | None shown | | | |
| 68 | | W5 CIP concrete seat wall | None shown | | | |
| 69 | | W6 CIP concrete art pedestal, 10'-6" x 6'-9" x 3' H | None shown | | | |
| 70 | | | | | | |
| 71 | | **Site elements & Structures** | | | | |
| 72 | | E1 Metal running bench | None shown | | | |
| 73 | | E2 Metal planting rail, bronze | None shown | | | |
| 74 | | E3 Custom wood bench | None shown | | | |
| 75 | | E4 Flag pole grove | None shown | | | |
| 76 | | E5 Granite bench | None shown | | | |
| 77 | | E6 Dog park fence, including (2) custom gates | 264 | LF | 140.00 | 36,960 |
| 78 | | E7 Park bench | 10 | EA | 2,800.00 | 28,000 |
| 79 | | E8 Fitness equipment | 1 | LS | 18,200.00 | 18,200 |
| 80 | | E9 Custom chess tables and stools | 6 | EA | 4,100.00 | 24,600 |
| 81 | | E10 Community message board | 1 | EA | 24,000.00 | 24,000 |
| 82 | | E11 Overhead light fixtures | See Site Electrical | | | |
| 83 | | | | | | |
| 84 | | **Allowances (items not yet shown on drawings)** | | | | |
| 85 | | Water fountain, accessible | 1 | EA | 6,500.00 | 6,500 |
| 86 | | Water fountain, accessible, bottle refill & dog fountain | 1 | EA | 8,000.00 | 8,000 |
| 87 | | Piping for water fountains | 400 | LF | 20.00 | 8,000 |

| | | | 40,600 | gsf | | |
|---|---|---|---|---|---|---|
| **Line** | **Tier** | **Component Description** | **Quantity** | **Unit** | **Unit Cost** | **Estimated Cost** |
| 88 | | Trenching | 400 | LF | 12.00 | 4,800 |
| 89 | | Trash receptacles, Landscape Forms or equal "Select Recycling System" trash and recycling double unit | 2 | EA | 3,100.00 | 6,200 |
| 90 | | Special litter bin for dog park: mm cite CP110, special litter bin for dog excrements with integrated plastic bag dispenser, stainless steel | 1 | EA | 1,400.00 | 1,400 |
| 91 | | | | | | |
| 92 | **3** | **Site Materials/Paving - Subtotal** | | | | **1,074,902** |
| 93 | | | | | | |
| 94 | | | | | | |
| 95 | **4** | **Planting/Landscaping** | | | | |
| 96 | | P11 Understory planting | 1,822 | SF | 15.00 | 27,330 |
| 97 | | Bioretention planting | 1,125 | SF | 16.00 | 18,000 |
| 98 | | P12 Lawn | None shown | | | |
| 99 | | Trees: | | | | |
| 100 | | 48" | 30 | EA | 2,200.00 | 66,000 |
| 101 | | 72" | 3 | EA | 6,600.00 | 19,800 |
| 102 | | 84" | 5 | EA | 9,000.00 | 45,000 |
| 103 | | Tree grates | 8 | EA | 2,000.00 | 16,000 |
| 104 | | Salvaged tree grates | 8 | EA | 200.00 | 1,600 |
| 105 | | Tree protection | 38 | EA | 150.00 | 5,700 |
| 106 | | | | | | |
| 107 | | Maintenance period | 6 | MTH | 1,200.00 | 7,200 |
| 108 | | | | | | |
| 109 | **4** | **Planting/Landscaping - Subtotal** | | | | **206,630** |
| 110 | | | | | | |
| 111 | | | | | | |
| 112 | **5** | **Irrigation** | | | | |
| 113 | | Irrigation at garden area | 1,822 | SF | 5.00 | 9,110 |
| 114 | | Irrigation at trees: | | | | |
| 115 | | 48" | 30 | EA | 590.00 | 17,700 |
| 116 | | 72" | 3 | EA | 590.00 | 1,770 |
| 117 | | 84" | 5 | EA | 590.00 | 2,950 |
| 118 | | Irrigation controller | 1 | LS | 1,200.00 | 1,200 |
| 119 | | | | | | |
| 120 | **5** | **Irrigation - Subtotal** | | | | **32,730** |
| 121 | | | | | | |
| 122 | | | | | | |
| 123 | **6** | **Site Electrical & Site Lighting** | | | | |
| 124 | | Upgrade site electrical power | 1 | LS | 100,000.00 | 100,000 |
| 125 | | | | | | |
| 126 | | Site Lighting Fixtures | | | | |
| 127 | | Façade lighting (excluded) | Excluded | | | |
| 128 | | Mast lights, (E) lights to be upgraded | 2 | EA | 1,500.00 | 3,000 |
| 129 | | Pedestrians-Scale street lamps | None | | | |
| 130 | | Overhead light canopy | 40 | EA | 520.00 | 20,800 |
| 131 | | Garden/Intimate lighting | None | | | |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.4 ESTIMATE DETAILS - LEAVENWORTH** **Date: 1/14/2019**

| Line | Tier | Component Description | 40,600 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 132 | | Paving - inset lights, 1/40SF typ | | None | | |
| 133 | | Entry thresholds, 1/30 LF typ | | None | | |
| 134 | | City Hall Lights (excluded) | | Excluded | | |
| 135 | | | | | | |
| 136 | | Conduits & cables including trenching, allowance | 1,260 | LF | 35.00 | 44,100 |
| 137 | | 6" poles for catenary overhead light feature | 10 | EA | 2,000.00 | 20,000 |
| 138 | | Footings for poles | 10 | EA | 800.00 | 8,000 |
| 139 | | | | | | |
| 140 | **6** | **Site Electrical & Site Lighting - Subtotal** | | | | **195,900** |
| 141 | | | | | | |
| 142 | | | | | | |
| 143 | **7** | **Non-potable Water Reuse** | | | | |
| 144 | | Public restroom | 1 | EA | 100,000.00 | 100,000 |
| 145 | | | | | | |
| 146 | **7** | **Non-potable Water Reuse - Subtotal** | | | | **100,000** |
| 147 | | | | | | |
| 148 | | | | | | |
| 149 | **8** | **Surface Architectural Elements** | | NONE | | |
| 150 | | | | | | |
| 151 | | | | | | |
| 152 | **9** | **Brooks Hall additional structure** | | NONE | | |
| 153 | | | | | | |
| 154 | | | | | | |
| 155 | **10** | **Civic Center Parking Garage** | | NONE | | |
| 156 | | | | | | |
| 157 | | | | | | |
| 158 | **11** | **Other Below-grade Structures** | | NONE | | |
| 159 | | | | | | |
| 160 | | | | | | |
| 161 | **12** | **Public Art Allowance** | | | | |
| 162 | | Public art, allow, at 1% | 1 | LS | 21,500.00 | 21,500 |
| 163 | | | | | | |
| 164 | **12** | **Public Art Allowance - Subtotal** | | | | **21,500** |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.5 ESTIMATE DETAILS - CC PARKING GARAGE** **Date: 1/14/2019**

| Line | Tier | Component Description | 201,200 Quantity | gsf Unit | Unit Cost | Estimated Cost |
|---|---|---|---|---|---|---|
| 1 | **1** | **Demolition/Existing Conditions** | | NONE | | |
| 2 | | | | | | |
| 3 | | | | | | |
| 4 | **2** | **Earthwork and Grading** | | NONE | | |
| 5 | | | | | | |
| 6 | | | | | | |
| 7 | **3** | **Site Materials/Paving** | | NONE | | |
| 8 | | | | | | |
| 9 | | | | | | |
| 10 | **4** | **Planting/Landscaping** | | NONE | | |
| 11 | | | | | | |
| 12 | | | | | | |
| 13 | **5** | **Irrigation** | | NONE | | |
| 14 | | | | | | |
| 15 | | | | | | |
| 16 | **6** | **Site Electrical & Site Lighting** | | NONE | | |
| 17 | | | | | | |
| 18 | | | | | | |
| 19 | **7** | **Non-potable Water Reuse** | | NONE | | |
| 20 | | | | | | |
| 21 | | | | | | |
| 22 | **8** | **Surface Architectural Elements** | | NONE | | |
| 23 | | | | | | |
| 24 | | | | | | |
| 25 | **9** | **Brooks Hall additional structure** | | NONE | | |
| 26 | | | | | | |
| 27 | | | | | | |
| 28 | **10** | **Civic Center Parking Garage** | | | | |
| 29 | | Shotcrete at (E) concrete walls | | | | |
| 30 | | Rebar, including dowels | 174,240 | LB | 3.00 | 522,720 |
| 31 | | Concrete material and placement | 807 | CY | 350.00 | 282,450 |
| 32 | | Concrete finishing | 21,644 | SF | 1.30 | 28,137 |
| 33 | | | | | | |
| 34 | | FRP panels | 134,100 | SF | 6.00 | 804,600 |
| 35 | | | | | | |
| 36 | | Concrete ramps | 3,750 | sf-key qty | | |
| 37 | | Formwork | 8,480 | SF | 25.00 | 212,000 |
| 38 | | Rebar, including dowels | 30,938 | LB | 3.00 | 92,814 |
| 39 | | Concrete material and placement | 153 | CY | 350.00 | 53,550 |
| 40 | | Concrete finishing | 4,310 | SF | 1.30 | 5,603 |
| 41 | | | | | | |
| 42 | | Concrete walls at ramps, 18" thick | | | | |
| 43 | | Formwork | 9,090 | SF | 22.00 | 199,980 |
| 44 | | Rebar | 37,125 | LB | 3.00 | 111,375 |
| 45 | | Concrete material and placement | 275 | CY | 350.00 | 96,250 |
| 46 | | Concrete finishing | 9,090 | SF | 1.30 | 11,817 |
| 47 | | | | | | |

**CIVIC CENTER PUBLIC SPACE**
**ESTIMATE OF PROBABLE CONSTRUCTION COST**
**BASED ON CONCEPTUAL DESIGN INFORMATION**
**3.5 ESTIMATE DETAILS - CC PARKING GARAGE** **Date: 1/14/2019**

| | | | 201,200 | gsf | | |
|---|---|---|---|---|---|---|
| **Line** | **Tier** | **Component Description** | **Quantity** | **Unit** | **Unit Cost** | **Estimated Cost** |
| 48 | | Concrete infill slab, 18" thick | 16,500 | sf-key qty | | |
| 49 | | Formwork | 18,555 | SF | 22.00 | 408,210 |
| 50 | | Rebar | 136,125 | LB | 2.50 | 340,313 |
| 51 | | Concrete material and placement | 1,008 | CY | 350.00 | 352,800 |
| 52 | | Concrete finishing | 18,555 | SF | 1.30 | 24,122 |
| 53 | | Drill and epoxy grout at (E) slabs | 2,742 | EA | 140.00 | 383,880 |
| 54 | | | | | | |
| 55 | | Drop panel, 10' L x 10' W x 6" H | 21 | EA | 2,500.00 | 52,500 |
| 56 | | Column, 1'-3" L x 3'-9" W x 10' H | 21 | EA | 6,000.00 | 126,000 |
| 57 | | | | | | |
| 58 | | Roughen and provide shear keys next to walls | 240 | LF | 30.00 | 7,200 |
| 59 | | Concrete walls for (N) stairwell/elevator shafts and openings in (E) roof slab, 8" thick | | | | |
| 60 | | Formwork | 3,622 | SF | 22.00 | 79,684 |
| 61 | | Rebar | 3,630 | LB | 3.00 | 10,890 |
| 62 | | Concrete material and placement | 36 | CY | 350.00 | 12,600 |
| 63 | | Concrete finishing | 3,622 | SF | 1.30 | 4,709 |
| 64 | | Drill and epoxy grout at (E) slab | 482 | EA | 140.00 | 67,480 |
| 65 | | | | | | |
| 66 | | Site retaining walls at planters | | | | |
| 67 | | Formwork | 7,860 | SF | 22.00 | 172,920 |
| 68 | | Rebar | 9,251 | LB | 1.70 | 15,727 |
| 69 | | Concrete material and placement | 92 | CY | 350.00 | 32,200 |
| 70 | | Concrete finishing | 7,860 | SF | 1.30 | 10,218 |
| 71 | | Drill and epoxy grout at (E) slab | 842 | EA | 140.00 | 117,880 |
| 72 | | Geosynthetic drainage layer at site retaining walls | 3,364 | SF | 4.00 | 13,456 |
| 73 | | | | | | |
| 74 | | Concrete pads at restroom/retail/housing structure (see CCPG access pavilion line item in CC Plaza for fixed base connection, cantilevers, custom shapes, composite framing, and AESS) | | | | |
| 75 | | Formwork | 420 | SF | 22.00 | 9,240 |
| 76 | | Rebar | 990 | LB | 1.70 | 1,683 |
| 77 | | Concrete material and placement | 7 | CY | 350.00 | 2,450 |
| 78 | | Concrete finishing | 420 | SF | 1.30 | 546 |
| 79 | | Drill and epoxy grout at slab | 260 | EA | 140.00 | 36,400 |
| 80 | | | | | | |
| 81 | | | | | | |
| 82 | **10** | **Civic Center Parking Garage - Subtotal** | | | | **4,704,403** |
| 83 | | | | | | |
| 84 | | | | | | |
| 85 | **11** | **Other Below-grade Structures** | | NONE | | |
| 86 | | | | | | |
| 87 | | | | | | |
| 88 | **12** | **Public Art Allowance** | | NONE | | |

BOARD OF SUPERVISORS
CITY & COUNTY OF SAN FRANCISCO

OFFICE OF THE CLERK OF THE BOARD

Phone: (415) 554-5184
Email: Angela.Calvillo@sfgov.org

October 31, 2025

Sarah Dennis Phillips, Director
Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Via Email: Sarah.Dennis-Phillips@sfgov.org

Dear Director Dennis Phillips,

At the October 28, 2025, Board of Supervisors meeting, Supervisor Bilal Mahmood issued the attached inquiry to the Planning Department (CPC). Please review the attached letter of inquiry, which provides the Supervisor's request.

The inquiry, in summary, pertains to the status of the Civic Center Public Realm Plan and implementation. Supervisor Mahmood requests that CPC provide the following information:

1. Estimated Costs: What are the most current estimated costs for each of the major sub-projects identified in the plan, such as improvements to Civic Center Plaza, United Nations (UN) Plaza, Fulton Mall, and the surrounding corridors? If available, please include both design and construction estimates, as well as any updates since the plan's endorsement.

2. Funding Sources: What funding sources have been identified or secured to support these projects? Please describe any confirmed or potential allocations from City funds, state or federal grants, philanthropic partnerships, or other sources. Are there known funding gaps that could affect the project phasing?

3. Timeline for Work: What is the anticipated timeline for work on these projects, including design completion, environmental review, permitting, and construction start? Which subprojects are prioritized for implementation in the near future, and what interagency coordination efforts are currently underway to support their advancement?

4. Opportunities for Progress: What elements of the plan are implementable in the short-term without the need for outside funding? What parts of planning, visioning, or activation can be achieved within existing budgets?

Please contact, Raynell Cooper, Raynell.Cooper@sfgov.org, Legislative Aide to Supervisor Mahmood, for any questions related to this request, and copy BOS@sfgov.org on all communications to enable my office to track and close out this inquiry. Please provide your response no later than December 1, 2025.

For questions pertaining to the administration of this inquiry, do not hesitate to contact me in the Office of the Clerk of the Board at (415) 554-5184.

Very Truly Yours,

Angela Calvillo
Clerk of the Board
San Francisco Board of Supervisors

WN/JB

Attachment:

- Introduction Form
- Letter of Inquiry

Cc: Dan Sider, CPC, Dan.Sider@sfgov.org
Corey Teague, CPC, Corey.Teague@sfgov.org
Tina Tam, CPC, Tina.Tam@sfgov.org
Lisa Gibson, CPC, Lisa.Gibson@sfgov.org
Aaron Starr, CPC, Aaron.Starr@sfgov.org
Josh Switzky, CPC, Joshua.Switzky@sfgov.org
Joy Navarrete, CPC, Joy.Navarrete@sfgov.org
Debra Dwyer, CPC, Debra.Dwyer@sfgov.org
Elizabeth Watty, CPC, Elizabeth.Watty@sfgov.org

Member, Board of Supervisors

District 5

City and County of San Francisco

**BILAL MAHMOOD**
馬百樂

October 28, 2025

Dear San Francisco Planning Department,

I am writing to inquire about the status of the Civic Center Public Realm Plan and its implementation, which was endorsed by the Planning Commission earlier this year. We recognize the Planning Department's leadership in shaping this long-term plan and understand that enactment will require coordination among multiple city agencies and partners.

Our office is eager to better understand the progression of this plan, particularly regarding project costs, funding strategies, and delivery timelines, in order to support efforts that strengthen the Civic Center as a vibrant, accessible, and safe public space. The open space in Civic Center is essential to the vitality of the Tenderloin neighborhood and the City as a whole. We understand the plan's scope means that its full completion would be costly and time-intensive and wish to learn more about how to make progress in the short term and be best prepared to secure funding and full buildout in the long term.

To help inform and update constituents, we respectfully request a coordinated response to the following questions:

1. Estimated Costs: What are the most current estimated costs for each of the major sub-projects identified in the plan, such as improvements to Civic Center Plaza, UN Plaza, Fulton Mall, and the surrounding corridors? If available, please include both design and construction estimates, as well as any updates since the plan's endorsement.

2. Funding Sources: What funding sources have been identified or secured to support these projects? Please describe any confirmed or potential allocations from City funds, state or federal grants, philanthropic partnerships, or other sources. Are there known funding gaps that could affect the project phasing?

City Hall, Room 244 • 1 Dr. Carlton B. Goodlett Place • San Francisco, CA 94102-4689
(415) 554-7630 • Bilal.Mahmood@sfgov.org

3. Timeline for Work: What is the anticipated timeline for work on these projects, including design completion, environmental review, permitting, and construction start? Which subprojects are prioritized for implementation in the near future, and what interagency coordination efforts are currently underway to support their advancement?

4. Opportunities for Progress: What elements of the plan are implementable in the short-term without the need for outside funding? What parts of planning, visioning, or activation can be achieved within existing budgets?

Our goal is to ensure that San Franciscans are involved in the development process of Civic Center and receive clear and transparent updates about its progress. We appreciate your attention to this matter and look forward to the future improvement of public space in Civic Center.

Sincerely,



Bilal Mahmood
District 5 Supervisor

City Hall, Room 244 • 1 Dr. Carlton B. Goodlett Place • San Francisco, CA 94102-4689
(415) 554-7630 • Bilal.Mahmood@sfgov.org

# Introduction Form

*(by a Member of the Board of Supervisors or the Mayor)*

I hereby submit the following item for introduction (select only one):

☐ 1. For reference to Committee (Ordinance, Resolution, Motion or Charter Amendment)

☐ 2. Request for next printed agenda (For Adoption Without Committee Reference)
*(Routine, non-controversial and/or commendatory matters only)*

☐ 3. Request for Hearing on a subject matter at Committee

■ 4. Request for Letter beginning with "Supervisor Mahmood inquires…"

☐ 5. City Attorney Request

☐ 6. Call File No. _____ from Committee.

☐ 7. Budget and Legislative Analyst Request (attached written Motion)

☐ 8. Substitute Legislation File No. _____

☐ 9. Reactivate File No. _____

☐ 10. Topic submitted for Mayoral Appearance before the Board on _____

The proposed legislation should be forwarded to the following (please check all appropriate boxes):

☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission

☐ Planning Commission ☐ Building Inspection Commission ☐ Human Resources Department

General Plan Referral sent to the Planning Department (proposed legislation subject to Charter 4.105 & Admin 2A.53):

☐ Yes ■ No

*(Note: For Imperative Agenda items (a Resolution not on the printed agenda), use the Imperative Agenda Form.)*

Sponsor(s):

Mahmood

Subject:

Letter of Inquiry regarding the implementation of the Civic Center Public Realm Plan

Long Title or text listed:

Supervisor Mahmood inquires of the Planning Department the costs, timeline, and opportunities for progress on the Civic Center Public Realm Plan.

Signature of Sponsoring Supervisor: /s/ Bilal Mahmood

item 7

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Letter of Inquiry from Supervisors Chen and Mahmood |
| **Date:** | Tuesday, December 2, 2025 11:42:01 AM |
| **Attachments:** | SFUSD Response_SFBOS LOI ICE Activities.pdf<br>25.10.28 Chen CTA_ Clerk"s Memo Signed.pdf<br>25.10.28 Chen CTA LOI.pdf<br>25.10.28 Chen CTA Inro Form.pdf |

Hello,

Please see attached and below communication from the San Francisco Unified School District (SFUSD) in response to a Letter of Inquiry issued by Supervisors Chyanne Chen and Bilal Mahmood at the October 28, 2025, Board of Supervisors meeting.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

---

**From:** Pang, Hong Mei <pangh@sfusd.edu>
**Sent:** Tuesday, December 2, 2025 10:22 AM
**To:** Chen, Chyanne (BOS) <Chyanne.Chen@sfgov.org>; Mahmood, Bilal (BOS) <bilal.mahmood@sfgov.org>
**Cc:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; Chin, Linshao (BOS) <linshao.chin@sfgov.org>; Prager, Jackie (BOS) <jackie.prager@sfgov.org>; Johnston, Jennifer (ADM) <jennifer.johnston@sfgov.org>; Hayward, Sophie (ADM) <sophie.hayward@sfgov.org>; Chu, Carmen (ADM) <carmen.chu@sfgov.org>; Logan, Samantha (BOS) <sam.logan@sfgov.org>; Su, Maria (USD) <mariasu@sfusd.edu>

**Subject:** Re: Letter of Inquiry from Supervisors Chen and Mahmood

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

Good morning Supervisor Mahmood and Supervisor Chen,

On behalf of SFUSD Superintendent Dr. Maria Su, please see the attached SFUSD response to your LOI regarding existing policies, procedures, and trainings for SFUSD operations and staff regarding SFUSD's response to Immigration and Customs Enforcement ("ICE").

I am copying the Office of the Clerk of the Board, along with the City Administrator and her office here to streamline distribution of our response. Please do not hesitate to reach out if you have any questions or would like to follow up.

Thank you,
Hong Mei

**Dr. Maria Su**
**Superintendent of Schools &**
**San Francisco County Office of Education**
555 Franklin Street, Room 301 | San Francisco, CA 94102
PH: (415) 241-6121 | Email: mariasu@sfusd.edu

Transmitted via email

December 2, 2025

Hon. Bilal Mahmood, Member, Board of Supervisors, District 5
Hon. Chyanne Chen, Member, Board of Supervisors, District 11
San Francisco City Hall
1 Dr. Carlton B. Goodlett Place
Room 244
San Francisco, California 94102-4689

Dear Supervisor Mahmood and Supervisor Chen,

The San Francisco Unified School District ("SFUSD") is in receipt of your correspondence titled, "Re: Letter of Inquiry - Policies, Procedures, and Trainings for City Operated Services at City Owned Properties" which was directed to several governmental agencies and public officials. Your correspondence was dated October 28, 2025, but was received by SFUSD on November 3, 2025. In your correspondence, you make several requests for information regarding existing policies, procedures, and trainings for SFUSD operations and staff regarding SFUSD's response to Immigration and Customs Enforcement ("ICE").

Your inquiries are timely and reflect the shared values of SFUSD and the City and County of San Francisco ("City"). I want to assure you that SFUSD schools are safe places where students can learn and grow without fear. All children in San Francisco, regardless of immigration status, have a constitutional right to receive a public education. (*Plyler v. Doe* (1982) 457 U.S. 202.) SFUSD is committed to doing everything within our power to uphold and protect that right. During these uncertain times, it is important for children to maintain their daily routines, like attending school. In order to achieve this important goal, the Governing Board for SFUSD recognizes that agencies at all levels of government share its concern and responsibility for the health, safety, and welfare of youth. (Board Policy ("BP") 1400.) We agree that SFUSD and the City have a joint responsibility to protect our community. With this in mind, your questions are recited below, as are the responses from SFUSD.

***As such, I am asking that each department provide us with responses to the following questions*[1]:**

1. ***What are the policies and procedures in place when ICE agents enter your facility or public transportation?***

**Response:** Since the first Trump Administration in 2016, SFUSD has developed and implemented several policies and procedures for staff regarding what to do should ICE attempt to enter either our facilities or our student transportation. SFUSD is a sanctuary school district. This means that our schools are safe havens where all students are welcomed and valued, and where every child has the right to attend school, no matter their immigration status or that of their family members. Unlike some City or County facilities, the majority of SFUSD properties serve children in an educational setting and are not open to the general public. SFUSD has established clear protocols for school staff in the event that immigration officials attempt to enter our schools. At the beginning of each school year, all staff are required to review and understand these protocols so they are prepared to respond appropriately. SFUSD's policies and procedures are publicly available for review. A brief summary of the protocols are recited here, and the more in-depth information can be found at the following links:

- Immigration officials shall be redirected to the SFUSD Legal Office at 555 Franklin St. to seek approval for access to a school site for any purpose.
- If the officer doesn't leave, they will be escorted to the front office and an administrator will be notified. The officer will NOT be provided with information about students or families or offered access to campus except to the front office.
- The site administrator will get clarification about the purpose of the officer's visit and contact the SFUSD Legal Office.
- The district will not give access to students or student information except when mandated pursuant to a valid warrant or court order signed by a federal or state judge, or if the officer declares that exigent circumstances necessitate immediate action. (Board Policy 5145.10)
- **What happens if an immigration officer shows up at a school event before 8 a.m. or after 5 p.m.?** The site administrator will be contacted. If a site administrator is not on site, staff will contact the SF Rapid Response Network 24-Hour Hotline at (415) 200-1548.

[1] Although not found in the original request, the questions have been numbered for convenience.

The network may send a responder or an attorney to the site. The student's caregiver will be informed by site staff or after-school staff.

- **What if I hear a rumor that immigration officers are in our school's neighborhood?** If you or someone you know observes an individual in your school's neighborhood who is believed to be an immigration officer, contact the SF Rapid Response Network 24-Hour Hotline at (415) 200-1548. To help verify your observations, please provide a video or photos.
- **If I'm worried about immigration officers taking my student from their school, can I keep my child at home?** SFUSD staff, teachers, and administrators are trained on what to do if an official comes to the school. If there is a safety issue or possibility of disruption, staff will keep students in class until the area is cleared and safe for students. All youth and children in San Francisco have a constitutional right to receive a public education. SFUSD will do everything within our power to ensure every child's rights are preserved. It is important for children to maintain their routines during challenging times, and if there are concerned about a child's well-being, parents and caregivers are encouraged to reach out to their school site principal or teacher.
- **What if I am not able to pick up a student from school due to a parent/caregivers's immigration issue?** The student's school will contact all numbers on the student's emergency card to identify a relative or caregiver authorized to take care of the student in the parents' absence. So please make sure that student emergency cards are up to date and include as many trusted adults as possible. Alternatively, the school can release the student into the custody of an adult who presents a Caregiver's Authorization Affidavit on behalf of the student. If no one is able to pick up a child, Child Protective Services will be contacted.
- **What can I do to prepare my family in case of an emergency or separation?**

  Here are resources that will help families prepare:

  - ILRC's Family Preparedness Toolkit: Lengthy explanation of detention/deportation planning (Chinese, English, Spanish)
  - SFILEN's Family Emergency Plans: Printable booklet with information and fillable forms for families to complete with important personal information in case of emergency or separation (Arabic, Chinese, English, Filipino, Spanish)

  Here are some key things to remember:

- If anyone you know is detained by ICE in San Francisco, call the Rapid Response 24-Hour Network Hotline: (415) 200-1548.
- Have a plan to take care of your children if you are detained. Make a plan with an adult family member or friend with legal authorization to be in the United States who you can contact in an emergency to take care of your child. As soon as you can, ask the ICE agent to let you call that person to take care of your child.
- Have the number of an immigration attorney with you. There is no right to a free attorney unless you are charged with a crime. There are organizations that can help you find low-cost or free immigration attorneys.
- Avoid fraud! Take steps to ensure the person you're working with is allowed to practice law.
- City of San Francisco Immigrant Support website
- Bar Association of San Francisco: (415) 989-1616
- SF Rapid Response Network: (415) 200-1548

- We willc continue to partner with local and non-profit agencies to make information and resources available to students, families and staff, including topics such as family emergency planning and know-your-rights workshops.

**2.** ***If ICE is allowed on site, what are the procedures in place for city staff to engage if at all?***

**Response:** Because City employees do not regularly staff our schools, we interpret this question to seek information on how SFUSD staff are to "engage if at all" with ICE agents. SFUSD has established clear protocols for school staff in the event that immigration officials enter our schools. At the beginning of each school year, all staff are required to review and understand these protocols so they are prepared to respond appropriately. SFUSD's policies and procedures are publicly available for review. A brief summary of the protocols are recited here, and the more indepth information can be found at the links cited at the end of our response.

- Immigration officials shall be redirected to the SFUSD Legal Office at 555 Franklin St. to seek approval for access to a school site for any purpose.
- If the officer doesn't leave, they will be escorted to the front office and an administrator will be notified. The officer will NOT be

provided with information about students or families or offered access to campus except to the front office.

- The site administrator will get clarification about the purpose of the officer's visit and contact the SFUSD Legal Office.
- The district will not give access to students or student information except when mandated pursuant to a valid warrant or court order signed by a federal or state judge, or if the officer declares that exigent circumstances necessitate immediate action. (Board Policy 5145.10)
- **What happens if an immigration officer shows up at a school event before 8 a.m. or after 5 p.m.?** The site administrator will be contacted. If a site administrator is not on site, staff will contact the SF Rapid Response Network 24-Hour Hotline at (415) 200-1548. The network may send a responder or an attorney to the site. The student's caregiver will be informed by site staff or after-school staff.

**3.** ***What trainings do department staff receive on how to interact with federal immigration enforcement officers?***

**Response:** Because City employees do not regularly staff our schools, we interpret this question to seek information regarding the training that SFUSD staff received. Staff have been provided training though a variety of methods. Several trainings on these topics have been held through the years. Specifically, staff have been trained online, in person and through various informational links. Further training is expected to keep staff informed about developing issues and to serve as refreshers.

**4.** ***Do department staff receive de-escalation training?***

**Response:** Because City employees do not regularly staff our schools, we interpret this question to seek information on whether SFUSD staff receive de-escalation training as it pertains to ICE agents. SFUSD staff consists of educators and support staff whose mission is to educate and protect students. While staff are trained in dealing with a variety of difficult members of the public, SFUSD staff are neither trained or equipped to confront armed ICE agents or military personnel. Rather, SFUSD staff are trained to "de-escalate" citations with federal agents through existing protocols mentioned and referenced throughout this response.

**5.** ***Do all staff who interface with the public receive training or only managers?***

**Response:** SFUSD training, information and policies are available to all SFUSD staff, not just managers.

**6.** **Are d*epartment staff fully trained on all recent state law changes in this area, including:***

**a.** ***Assembly Bill 49 by Al Muratsuchi (D-Torrance) — School sites: immigration enforcement.***

**Response:** Because City employees do not regularly staff our schools, we interpret this question to seek information on whether SFUSD staff are fully trained on recently adopted Assembly Bill ("AB") 49. According to the bill, AB 49 requires the Attorney General to first update certain model policies by December 1, 2025. Once written, the Attorney General's updates will provide guidance, to school districts that do not have such policies, on how to align themselves with the prohibitions on school employees from allowing an officer or employee of an agency conducting immigration enforcement to enter a nonpublic area of a school site without a valid judicial warrant or judicial subpoena, or a court order and from disclosing or providing certain information to those officers or employees, as provided. AB 49 goes on to require a local educational agency to update its model policy by March 1, 2026, and to make the policy available to the State Department of Education upon request. By imposing additional duties on local educational agencies, the bill would impose a state-mandated local program. For several years now, SFUSD has adopted policies and trained staff on the prohibition of federal agents on SFUSD property. To the extent that AB 49, and the future Attorney General guidance, requires more than what SFUSD is currently doing, SFUSD will become compliant by the March 1, 2026 deadline.

**b.** ***Senate Bill 81 by Jesse Arreguín (D-Berkeley) — Health and care facilities: information sharing.***

**Response:** Senate Bill ("SB") 81 requires health care provider entities, not school districts such as SFUSD, to establish or amend procedures for monitoring, documenting, and receiving visitors to health care provider entities to the extent possible. SB 81 requires health care provider entity personnel to immediately notify health care provider entity management, administration, or legal counsel of any request for access to a health care provider entity site or patient for immigration enforcement, and to provide any requests for review of health care provider entity documents, as prescribed. This requirement mirrors existing SFUSD policy, in which staff are trained.

**c.** ***Senate Bill 98 by Sasha Renée Pérez (D-Pasadena) — Elementary, secondary, and postsecondary education: immigration enforcement: notification.***

**Response:** SB 98 states that at the time a comprehensive school safety plan is next reviewed and updated, or by no later than March 1, 2026, those plans to include procedures specifically designed to notify parents and guardians of pupils, teachers, administrators, and school personnel when the school confirms the presence of immigration enforcement, as defined, on the school site. SFUSD is in the process of ensuring that all such plans are updated consistent with this law.

**d.** ***Senate Bill 627 by Scott Wiener (D-San Francisco) — Law enforcement: masks.***

**Response:** SB 627 makes it a crime for a law enforcement officer to wear a facial covering in the performance of their duties, and SFUSD does not enforce this law. SFUSD will cooperate with state and local agencies tasked with implementing the new legislation as permitted by law.

e. ***Senate Bill 805 by Sasha Renée Pérez (D-Pasadena) — Law enforcement: masks.***

**Response:** SB 805 prohibits the impersonation of a law enforcement officer, including a federal law enforcement officer, and SFUSD does not enforce this law. SFUSD will cooperate with state and local agencies tasked with implementing the new legislation as permitted by law.

**7. Are department policies posted either on site or online? If yes, are they accessible in multiple languages?**

**Response:** Because City employees do not regularly staff our schools, we interpret this question to seek information regarding the posting of SFUSD policies and procedures. Yes, SFUSD policies are posted online. Yes, SFUSD instructions regarding who to call should ICE agents appear, are posted online and at sites in multiple languages.

**8. Does your department have protocols distinguishing between civil immigration enforcement and criminal warrants or subpoenas, and how are staff instructed to verify or defer such interactions?**

**Response:** Because City employees do not regularly staff our schools, we interpret this question to seek information regarding the handling of civil versus criminal inquiries. SFUSD policies treat both civil and criminal inquiries the same, and require staff to utilize SFUSD's Legal Department, through licensed attorneys, to navigate these issues.

**9. Has your department experienced an ICE-related incident or inquiry in recent years?**

**Response:** Because City employees do not regularly staff our schools, we interpret this question to seek information regarding whether ICE-related incidents or inquiries have occurred in recent years. Yes, SFUSD has felt the impact of ICE-related activities in our community but

no immigration enforcement activities have taken place on SFUSD grounds.

**10. If so, how was it handled and reviewed?**

**Response:** SFUSD has implemented a variety of responses, such as engaging with the Rapid Response Network, community based organizations, in-house legal counsel, local law enforcement, coordination with the Mayor's Office and direct communication with families.

SFUSD is thankful for the City's leadership and support on these important issues. Please feel free to contact us if you have any questions.

**LIST OF LINKS**

- https://www.sfusd.edu/services/family-supports-services/immigration-policy-resources
- Board Policy 5145.10
- https://www.sfusd.edu/announcements/2025-10-21-message-superintendent
- https://drive.google.com/drive/folders/1b9nY9DEI70z4B8ukm54h2lN9ju8OzGcs
- Caregiver's Authorization Affidavit
- Family Preparedness Toolkit
- Family Emergency Plans
- Avoid fraud!
- City of San Francisco Immigrant Support website
- Bar Association of San Francisco
- SF Rapid Response Network

CC:
San Francisco Board of Supervisors
Carmen Chu, San Francisco City Administrator
Jennifer Johnston, San Francisco Deputy City Administrator

# BOARD OF SUPERVISORS
CITY & COUNTY OF SAN FRANCISCO

# OFFICE OF THE CLERK OF THE BOARD

Phone: (415) 554-5184
Email: Angela.Calvillo@sfgov.org


October 31, 2025

Carmen Chu, City Admistrator
Office of the City Administrator
1 Dr. Carlton B. Goodlett Place, Room 362
San Francisco, CA 94102
Via Email: Carmen.Chu@sfgov.org

Paul Yep, Chief
San Francisco Police Department
1245 3rd Street
San Francisco, CA 94158
Via Email: Paul.Yep@sfgov.org

Michael Lambert, City Librarian
San Francisco Public Library
100 Larkin Street
San Francisco, CA 94102
Via Email: Michael.Lambert@sfpl.org

Sarah Dennis Phillips, Director
Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Via Email: Sarah.Dennis-Phillips@sfgov.org

Julie Kirschbaum, Director
SF Municipal Transportation Agency
1 South Van Ness Avenue
San Francisco, CA 94103
Via Email: Julie.Kirschbaum@sfmta.com

Ivy Lee, Director
Mayor's Office of Victims' Rights
49 South Van Ness Avenue
San Francisco, CA 94102
Via Email: Ivy.Lee.OVWR@sfgov.org

Shireen McSpadden, Director
Department of Homelessness and Supportive Housing
440 Turk Street
San Francisco, CA 94102
Via Email: Shireen.McSpadden@sfgov.org

Trent Rhorer, Director
San Francisco Human Services Agency
170 Otis Street
San Francisco, CA 94103
Via Email: Trent.Rhorer@sfgov.org

Patrick O'Riordan, Director
Department of Building Inspection
49 South Van Ness Avenue
San Francisco, CA 94103
Via Email: Patrick.Oriordan@sfgov.org

Dr. Daniel Tsai, Director
Department of Public Health
1145 Market Street
San Francisco, CA 94103
Via Email: Daniel.Tsai@sfdph.org

Booke Jenkins, District Attorney
Office of the District Attorney
350 Rhode Island Street, North Building Suite 400N
San Francisco, CA 94103
Via Email: Brooke.Jenkins@sfgov.org

Dr. Maria Su, Superintendent
San Francisco Unified School District
555 Franklin Street
San Francisco, CA 94102
Via Email: MariaSu@sfusd.edu

Manohar Raju, Public Defender
San Francisco Public Defender
555 7th Street
San Francisco, CA 94127
Via Email: Manohar.Raju@sfgov.org

Paul Miyamoto, Sheriff
Sheriff's Office
1 Dr. Carlton B. Goodlett Place, Room 456
San Francisco, CA 94102
Via Email: Paul.Miyamoto@sfgov.org

Dear City Administrator Chu, Chief Yep, City Librarian Lambert, Director Dennis Philips, Director Kirschbaum, Director Lee, Director McSpadden, Director Rhorer, Director O'Riordan, Director Tsai, District Attorney Jenkins, Superintendent Su, Public Defender Raju, and Sheriff Miyamoto,

At the October 28, 2025, Board of Supervisors meeting, Supervisors Chyanne Chen and Bilal Mahmood issued the attached inquiry to the Office of the City Administrator (ADM), San Francisco Police Department (SFPD), San Francisco Public Library (LIB), Planning Department (CPC), San Francisco Municipal Transportation Agency (SFMTA), Mayor's Office for Victims' Rights (OVWR), Department of Homelessness and Supportive Housing (HSH), San Francisco Human Services Agency (HSA), Department of Building Inspection (DBI), Department of Public Health (DPH), Office of the District Attorney (DAT), San Francisco Unified School District (SFUSD), San Francisco Public Defender's Office (PDR) and Sheriff's Office (SHF).

Please review the attached letter of inquiry, which provides the Supervisor's request.

Please contact, Jackie Prager, Jackie.Prager@sfgov.org, Legislative Aide to Supervisor Chen, for any questions related to this request, and copy BOS@sfgov.org on all communications to enable my office to track and close out this inquiry. Please provide your response no later than November 14, 2025.

For questions pertaining to the administration of this inquiry, do not hesitate to contact me in the Office of the Clerk of the Board at (415) 554-5184.

Very Truly Yours,

Angela Calvillo
Clerk of the Board
San Francisco Board of Supervisors

WN/JB

Attachment:

- Introduction Form
- Letter of Inquiry

Cc:
Vivian Po, ADM, Vivian.Po@sfgov.org
Angela Yip, ADM, Angela.Yip@sfgov.org
Steven Lopez, SFPD, Steven.Lopez1@sfgov.org
Sgt. Stacy Youngblood, SFPD, Stacy.A.Youngblood@sfgov.org
Carl Nicita, SFPD, Carl.Nicita@sfgov.org
Gianniana Miranda, SFPD, Giannina.Miranda@sfgov.org
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Tara Moriarty, SHF, Tara.Moriarty@sfgov.org
Richard Jue, SHF, Richard.Jue@sfgov.org

Member, Board of Supervisors
District 11

City and County of San Francisco

CHYANNE CHEN

October 28, 2025

**Re: Letter of Inquiry - Policies, Procedures, and Trainings for City Operated Services at City Owned Properties**

Dear City Administrator Chu, Chief Yep, City Librarian Lambert, Director Dennis-Phillips, Director Kirschbaum, Director Lee, Director McSpadden, Director Rhorer, Director O'Riordan, Director Tsai, District Attorney Jenkins, Dr. Su, Public Defender Raju, and Sheriff Miyamoto,

I am writing to you all in response to the increase in federal immigration enforcement and the subsequent fear, chaos, and misinformation that has spread throughout our city's immigrant communities. Of concurrent concern, the federal government has been shut down for nearly a month, cutting off access to essential services that individuals rely on for education, food, healthcare, and more.

Your departments manage entities, buildings, or vehicles that civilians may go to or utilize for services or information. It is imperative that our residents know that City agencies and staff do not assist with civil immigration enforcement, consistent with the City's sanctuary laws, and that our city agencies and staff have been trained on how to handle interactions with ICE at City facilities, including our public libraries, buses, health clinics, schools, and more.

As such, I am asking that each department provide us with responses to the following questions:

- What are the policies and procedures in place when ICE agents enter your facility or public transportation? If they are allowed on site, what are the procedures in place for city staff to engage if at all?
- What trainings do department staff receive on how to interact with federal immigration enforcement officers? Do department staff receive de-escalation training? Do all staff who interface with the public receive training or only managers?
- Are department staff fully trained on all recent state law changes in this area, including:
    - Assembly Bill 49 by Al Muratsuchi (D-Torrance) — School sites: immigration enforcement.
    - Senate Bill 81 by Jesse Arreguín (D-Berkeley) — Health and care facilities: information sharing.

City Hall • 1 Dr. Carlton B. Goodlett Place • Room 244 • San Francisco, California 94102-4689
Office (415) 554-6975 • TDD/TTY (415) 554-5227 • E-mail: Chyanne.Chen@sfgov.org

    - Senate Bill 98 by Sasha Renée Pérez (D-Pasadena) — Elementary, secondary, and postsecondary education: immigration enforcement: notification.
    - Senate Bill 627 by Scott Wiener (D-San Francisco) — Law enforcement: masks.
    - Senate Bill 805 by Sasha Renée Pérez (D-Pasadena) — Law enforcement: masks.
- Are department policies posted either on site or online? If yes, are they accessible in multiple languages?
- Does your department have protocols distinguishing between civil immigration enforcement and criminal warrants or subpoenas, and how are staff instructed to verify or defer such interactions?
- Has your department experienced an ICE-related incident or inquiry in recent years? If so, how was it handled and reviewed?

I appreciate that during this time of great turmoil for so many, that our city agencies are open to working in partnership to ensure that all residents feel safe and have access to the many services they need.

Thank you for your attention to this matter, and I look forward to your responses. Staff level questions may be directed to my legislative aide, Jackie Prager at jackie.prager@sfgov.org

Regards,



Chyanne Chen
San Francisco Board of Supervisors, District 11

cc: Carmen Chu, City Administrator
Paul Yep, Chief of Police
Michael Lambert, City Librarian
Sara Dennis Phillips, Planning Director
Julie Kirschbaum, Director of Transportation, SFMTA
Ivy Lee, Director of Mayor's Office for Victim's Rights
Shireen McSpadden, Director of Department of Homelessness and Supportive Housing
Trent Rhorer, Director of Human Services Agency
Pattrick O'Riordan, Director of Department of Building Inspection
Dan Tsai, Director Department of Public Health
Brooke Jenkins, District Attorney
Dr. Maria Su, SFUSD Superintendent
Mano Raju, Public Defender
Paul Miyamoto, Sheriff

# Introduction Form

*(by a Member of the Board of Supervisors or the Mayor)*

I hereby submit the following item for introduction (select only one):

☐ 1. For reference to Committee (Ordinance, Resolution, Motion or Charter Amendment)

☐ 2. Request for next printed agenda (For Adoption Without Committee Reference)
*(Routine, non-controversial and/or commendatory matters only)*

☐ 3. Request for Hearing on a subject matter at Committee

☐ 4. Request for Letter beginning with "Supervisor Mahmood inquires…"

☐ 5. City Attorney Request

☐ 6. Call File No. _____ from Committee.

☐ 7. Budget and Legislative Analyst Request (attached written Motion)

☐ 8. Substitute Legislation File No. _____

☐ 9. Reactivate File No. _____

☐ 10. Topic submitted for Mayoral Appearance before the Board on _____

The proposed legislation should be forwarded to the following (please check all appropriate boxes):

☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission

☐ Planning Commission ☐ Building Inspection Commission ☐ Human Resources Department

General Plan Referral sent to the Planning Department (proposed legislation subject to Charter 4.105 & Admin 2A.53):

☐ Yes ☐ No

*(Note: For Imperative Agenda items (a Resolution not on the printed agenda), use the Imperative Agenda Form.)*

Sponsor(s):

Mahmood

Subject:

Letter of Inquiry regarding the implementation of the Civic Center Public Realm Plan

Long Title or text listed:

Supervisor Mahmood inquires of the Planning Department the costs, timeline, and opportunities for progress on the Civic Center Public Realm Plan.

Signature of Sponsoring Supervisor: /s/ Bilal Mahmood

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Annual Municipal Buy Green Report for CY 2024 |
| **Date:** | Wednesday, December 3, 2025 10:20:20 AM |
| **Attachments:** | CY 2024 Annual Municipal Buy Green Report.pdf |

Hello,

Please see attached and below communication submitted by the Environment Department (ENV), pursuant to Environment Code, Chapter 2, Section 203(g), submitting the Municipal Buy Green 2024 Annual Report.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

---

**From:** Tanenberg, Diedre (ENV) <diedre.tanenberg@sfgov.org>
**Sent:** Wednesday, December 3, 2025 9:35:16 AM
**To:** Mchugh, Eileen (BOS) <eileen.e.mchugh@sfgov.org>
**Cc:** Hur, Alice (ENV) <alice.hur@sfgov.org>
**Subject:** Annual Municipal Buy Green Report for CY 2024

Dear Eileen,

Pursuant to the requirements of the **Environmentally Preferable Purchasing Ordinance** (Environment Code, Chapter 2, Sec. 203(g)), the Environment Department is

required to submit an annual report to the Board of Supervisors. Please confirm receipt of the attached report and distribute as appropriate.

Thank you, and please let me know if you have any questions.

Best regards,

**Diedre Tanenberg**
**Policy & Public Affairs Assistant Coordinator**
San Francisco Environment Department
1455 Market Street, 13A
San Francisco, CA 94103
diedre.tanenberg@sfgov.org
P: (415) 255-5870 (Videophone & Voice)

Pronouns: she, her, hers

---

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SAN FRANCISCO ENVIRONMENT DEPARTMENT

Daniel Lurie
Mayor

Tyrone Jue
Director

**To:** Members of the San Francisco Board of Supervisors
**Through:** Tyrone Jue, Director, San Francisco Environment Department
**From:** Shoba Iyer, PhD, Toxics Reduction Environmental Specialist, San Francisco Environment Department
**Date:** December 2, 2025
**Subject:** Annual Municipal Buy Green Report for Calendar Year 2024

## I. Introduction

Chapter 2 of the San Francisco Environment Code (i.e., the Environmentally Preferable Purchasing Ordinance) requires the City and County of San Francisco to ensure that purchases of commodities and expenditures of public money are made in a manner consistent with its human health and environmental policies. Chapter 5 of the San Francisco Environment Code (i.e., the Resource Conservation Ordinance) requires City departments to minimize consumption, maximize resource recovery, and purchase products with recycled content. Buying green products supports the health of the environment, municipal staff, and the public; contributes towards sustainability efforts; and can save on costs in the long run.

San Francisco's Environment Department (SFE) is required to annually review and report on City departments' progress toward full compliance with the Environmentally Preferable Purchasing Ordinance. To this end, SFE analyzes City departments' purchase data, available at our interactive, online dashboard. Below are SFE's highlights for the 2024 annual report:

- Analysis of sales data for architectural paint and IT equipment
- SFE's celebration of a City employee who has shown exceptional leadership and dedication to advancing municipal green purchasing efforts
- A summary of key accomplishments from 2024-2025
- Forecasting the Buy Green Program's goals for the year ahead

## II. Results of annual data analysis on selected municipal purchases

The Buy Green Team collected data on municipal purchases of architectural paints and IT equipment (specifically computers and monitors, as well as televisions and large digital displays) in the 2024 calendar year. Due to the significant time and resources required for research on City purchases, the Buy Green Team rotates its analyses each year between different product categories. Past categories have included paper, lighting, and janitorial products. Our online dashboard houses this data and is a tool for both monitoring City departments' compliance with green purchasing requirements and identifying potential barriers to compliance.

SAN FRANCISCO ENVIRONMENT DEPARTMENT

Data collection process and limitations

The Buy Green Team obtained municipal purchase data by requesting sales reports from suppliers for Citywide term contracts. Reporting sales data to the City is usually required under the contract terms. Once received, the data is cleaned, and any missing data is reconciled with the supplier. SFE reviews the products purchased by City departments and evaluates compliance with green purchasing requirements. There are some limitations to this approach. For example, the sales data obtained through this process do not include purchases made under Prop Q, which allows departments to buy certain supplies and equipment under $20,000 without a contract. While incomplete, we believe the data obtained provide some valuable insight into departments' compliance with San Francisco's green purchasing requirements.

Paints (Architectural) (2024 Sales)

San Francisco's purchasing requirements for architectural paints apply specifically to interior latex wall paints, ceiling paints, and primers. Other architectural paint types, such as interior finishes, exterior paints and primers, and specialty coatings for wood and metal, were not part of our analysis. There is one primary Citywide term contract through which architectural paints may be purchased. We were able to obtain 2024 sales data from the City's primary supplier, Paint Source. Interior wall and ceiling paints and primers that are compliant with San Francisco's green purchasing requirements must be latex-based and certified by one of three independent environmental certification standards that meet stringent air quality and safer chemical standards: Greenwise, Cradle to Cradle, or Master Painter's Institute (MPI) Extreme Green category. Interior wall and ceiling paints and primers that are neither latex-based nor certified to meet environmental standards like Greenwise, Cradle to Cradle, or MPI Extreme Green typically contain chemicals such as phthalates, benzene, vinyl chloride, and formaldehyde, and may also exceed volatile organic compound (VOC) limits set by these environmental standards. While these substances can enhance paint performance and durability, they are associated with health risks and negatively impact indoor air quality, especially for workers applying the paint and for individuals with respiratory conditions.

Encouragingly, in the last few decades, many commercial paints have transitioned from oil-based formulations to water-based alternatives (specifically acrylic- and latex-based paints), which reduced the use of more hazardous chemicals, marking a positive step toward lower VOC emissions and health risks. However, among these improved options, latex-based paints remain among the lowest VOC-emitting and safest choice, making them the preferred standard under San Francisco's green purchasing requirements.

Nine City departments purchased architectural paints from the Paint Source contract. The top five purchasing departments (by total dollars spent) were: the Department of Public Works (DPW), the Health Service System (HSS), Laguna Honda Hospital and Rehabilitation Center, the Public Utilities Commission (PUC), and Administrative Services- City Hall Events. Overall, about 85% of architectural paint purchases, by total monetary value, complied with the City's green purchasing requirements ($39,838 out of $46,769). Three of the nine departments, the San Francisco International Airport, Juvenile Probation, and the Port, made only compliant architectural paint purchases; that is, these three Departments were 100% compliant for this product category. The six departments that made non-compliant architectural paint purchases were: DPW, HSS, Laguna Honda Hospital and Rehabilitation Center, PUC, Administrative Services- City Hall Events, and the Municipal Transportation Agency (MTA). The largest dollar amount ($2,435) of non-compliant architectural paint was purchased by Laguna Honda Hospital and Rehabilitation Center. Most non-compliant purchases were water-based paints containing acrylic, though these are still a step in the right direction by reducing VOC emissions compared to traditional oil-based paints.

IT Equipment: Computers and Monitors, and Televisions and Large Digital Displays (2024 Sales)

There are multiple Citywide term contracts through which IT equipment may be purchased. We obtained 2024 sales data from three suppliers: Ameritech, Computerland, and Data Zones. Computers and monitors that are compliant with San Francisco's green purchasing requirements are required to be registered in the Electronic Product Environmental Assessment Tool (EPEAT) system at the time of purchase at Gold level or higher, or be TCO Certified. EPEAT is a registry of products satisfying the standard for environmental and social responsibility of computers and displays. These certifications ensure that purchased computers and monitors are environmentally and socially responsible, energy-efficient, and support the City's goals for sustainability and public health.

Twenty-five City departments purchased computers and monitors from the Ameritech, Computerland, and Data Zones contracts. The top five purchasing departments (by total dollars spent) were: the Human Services Agency (HSA), the Controller's Office, the Planning Department, DPW, and PUC. Overall, about 98% of computer and monitor purchases, by total monetary value, complied with the City's green purchasing requirements ($3.93M out of $4.01M). Sixteen of the 25 departments made only compliant computer and monitor purchases; that is, these 16 Departments were 100% compliant for this product category. HSA, the Controller's Office, and the San Francisco Public Library were the top three departments spending over $2.97M combined, and were 100% compliant. The largest non-compliant purchase was from the Fire Department, which acquired specialized rugged laptops designed to withstand extreme field conditions. This non-compliant purchase totaled $41,790.

Data was also obtained on purchases of televisions and large digital displays. Twenty-six City departments purchased televisions and large digital displays, and 17% of these purchases were compliant with the City's green purchasing requirements ($20,871 out of $123,397). To be compliant, these products must be listed on the Energy Star database. Many of the purchases under this category were televisions for conference monitors or displays used as signage, ranging in size from 45 to 70 inches. Energy Star-listed alternatives are widely available, with similar functionality and no significant difference in cost.

Per the environmental requirements specified in their contracts, suppliers should not sell non-compliant computers and monitors to City departments. In practice, however, we have learned that City departments are able to make non-compliant purchases. At the same time, these results demonstrate green purchasing compliance: City departments are largely adhering to green purchasing requirements for certain product categories, achieving approximately 98% compliance in computer and monitor purchases. Suppliers are providing compliant products. And the technology market has made considerable progress in offering more sustainable computers and monitors over the years. Our team will continue to collaborate with City staff and suppliers to better understand any real or perceived barriers to compliance with green purchasing requirements that safeguard human health and the environment.

IT Equipment: Computers and Monitors (Reuse through the Virtual Warehouse)
Since 2005, the City and County of San Francisco's Virtual Warehouse, governed by the Surplus Disposal Ordinance, established a hierarchy for redistributing surplus City-owned equipment such as office furniture, office supplies, electronics, and other accessories. The Virtual Warehouse helps to prevent valuable items from going to the landfill, save money on purchasing and disposal costs, and meet San Francisco's goal of zero waste. The Buy Green team actively advises City departments to utilize the Virtual Warehouse wherever possible to find available items for reuse. The current iteration of the Virtual Warehouse platform is powered by Rheaply.

In 2024, City departments internally redistributed a total of 530 computers and monitors through the platform. According to estimates generated by Rheaply, these redistributions resulted in an estimated $226,050 in cost savings and approximately 100,000 kg of $CO_2$ emissions avoided. The $CO_2$ emissions avoided is equivalent to about 250,000 miles driven by a gasoline-powered vehicle, as estimated by US EPA's Greenhouse Gas Equivalencies Calculator.

## III. Buy Green Award for 2024

As part of our annual reporting process, we identify a municipal colleague or department to be the recipient of our Buy Green Award. This year, we are awarding Jonathan Jew from the Office of Contract Administration with the Buy Green Award. The Buy Green Team celebrates Jonathan for his commitment to ensuring our environmental requirements are part of City contracts, for his attention to detail, and for his effective collaboration in implementing green purchasing practices across City departments and City suppliers.

We are recognizing Jonathan for going above and beyond to ensure that our environmental requirements were reflected in the City's janitorial supplies contract, that suppliers understood the requirements, and amending the bid sheet to include only compliant products. He has also been very helpful in securing sales data for our team, which we need in order to meet our annual reporting requirements. We truly appreciate Jonathan's hard work, partnership, and commitment to buying green.

On behalf of the City and County of San Francisco, we present this award to Jonathan as an appreciation for his committed work.

## IV. Key accomplishments from 2024-2025

1. Staff convened three Buy Green office hours, which are dedicated forums for City staff to connect with the Buy Green team, ask procurement-related questions, and learn about SFE's purchasing requirements.
2. In partnership with the Office of Contract Administration, staff strengthened green purchasing in City contracts by including environmental purchasing requirements for multiple Citywide term contracts, including for office supplies, landscaping services, and janitorial supplies.
3. In the 2024 calendar year, staff fielded 67 unique inquiries, 50 of which were purchasing-related and 17 of which were disposal-related. The inquiry topics included: HEPA air filters, carpet purchasing, sustainability of wood products, and battery recycling.
4. Staff began a scope of work for updating SF Approved website.
5. Staff continued to build collaborations with the Responsible Purchasing Network and the Sustainable Purchasing Leadership Council (SPLC), including participating in a regional capacity-building summit hosted by SPLC.

## V. Planned activities in 2026

1. Continue to build and maintain relationships with City staff who make or influence purchasing decisions by setting up networking calls, learning about the green purchasing barriers that departments are facing, and considering solutions that limit or avoid the inclusion of harmful chemicals in municipal purchases.
2. Continue convening quarterly Buy Green office hours with City staff.
3. Explore possibility of updating carpet purchasing requirements.
4. Continue working on updates to SF Approved.
5. Explore alternative approaches to collecting and analyzing municipal purchasing data. Continue efforts to visualize and present data in a clear, useful manner, detailing data methodologies and limitations.

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Results of Sale Refunding COPs - Series 2025-R2 & 2025-R3 |
| **Date:** | Tuesday, November 25, 2025 4:22:50 PM |

Hello,

Please see below communication from the Office of the Controller (CON), regarding the results of Refunding Certificates of Participation (COPs), Series 2025-R2 and 2025-R3.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

---

**From:** San Francisco Controller's Office of Public Finance <gabriella.shiferaw@sfgov.org>
**Sent:** Tuesday, November 25, 2025 1:54 PM
**To:** BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Subject:** Results of Sale Refunding COPs - Series 2025-R2 & 2025-R3

Alternate text

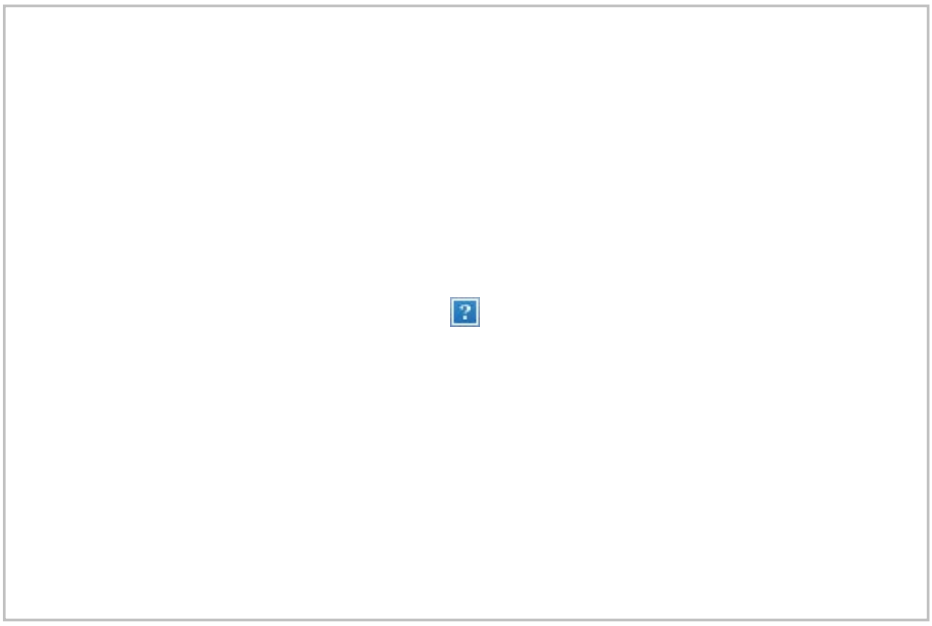


## Refunding Certificates of Participation, Series 2025-R2 & 2025-R3

On Wednesday, November 12, 2025, the City and County of San Francisco (the "City") priced $2.7 million Refunding Certificates of Participation, Series 2025-R2 (Port Facilities Project) (Non-AMT) (the "2025-R2 COPs") and $15.7 million Refunding Certificates of Participation, Series 2025-R3 (Port Facilities Project) (AMT) (the "2025-R3 COPs"), (together, the "Port Refunding COPs"). The Port Refunding COPs were issued to refinance the outstanding Series 2013B (Port Facilities Project) (Non-AMT) and Series 2013C (Port Facilities Project) (AMT) Certificates of Participation, (together, the "Prior COPs), which previously financed various capital improvements including construction of the Pier 27 Cruise Terminal.

## Refunding Savings

Due to lower interest rates and the ability to release reserve funds of the Prior COPs, the City was able to realize aggregate net present value savings of $1.5 million. The Port Refunding COPs generated net present value savings of  6.25% of the refunded par amount of the Prior COPs.



Pier 27 Cruise Terminal

## Sale Results

The Port Refunding COPs were sold via a negotiated sale with BofA Securities, Inc. as the underwriter. With a final maturity date of April 1, 2038, the True Interest Cost ("TIC") of 2025-R2 COPs is 3.20%. The 2025-R3 COPs have a final maturity date of April 1, 2043, with a TIC of 4.16%.



The Controller's Office of Public Finance would like to thank and congratulate everyone who put in the hard work to successfully bring this transaction to market.

---

For more information, please contact the Office of Public Finance:


Anna Van Degna, *Director*: anna.vandegna@sfgov.org

Grant Carson, *Debt Capital Markets Specialist:* grant.carson@sfgov.org

Keith Sevigny, *Principal Administrative Analyst:* keith.sevigny@sfgov.org

Gabriella Shiferaw, *Public Finance Analyst*: gabriella.shiferaw@sfgov.org



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1 Dr. Carlton B. Goodlett Place | San Francisco, CA 94102 US

This email was sent to bos.legislation@sfgov.org.
*To continue receiving our emails, add us to your address book.*

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: San Francisco Public Utilities Commission"s Quarterly Report to the Board of Supervisors on the Status of Applications to PG&E for Electric Service |
| **Date:** | Monday, December 1, 2025 2:25:53 PM |
| **Attachments:** | image001.png<br>December 2025_SFPUC"s Quarterly Report to the Board of Supervisors on the Status of Applications to PGE for Electric Service.pdf |

Hello,

Please see attached and below communication from the San Francisco Public Utilities Commission (SFPUC), pursuant to Resolution No. 227-18, submitting the Status of Applications to PG&E for Electric Service December 2025 Quarterly Report.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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---

**From:** Avery, Collin J <CAvery@sfwater.org>
**Sent:** Monday, December 1, 2025 2:21 PM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Cc:** Spitz, Jeremy (PUC) <JSpitz@sfwater.org>; SFPUC Government Affairs <governmentaffairs@sfwater.org>
**Subject:** San Francisco Public Utilities Commission's Quarterly Report to the Board of Supervisors on the Status of Applications to PG&E for Electric Service

Hello BOS team,

The attached quarterly report has been prepared for the Board of Supervisors in accordance with Resolution No. 227-18, approved by the Board on July 10, 2018 (File No. 180693), adopted on July 20, 2018, and re-affirmed on April 6, 2021.

Best,

**Collin Avery**
Policy & Government Affairs
San Francisco Public Utilities Commission
cavery@sfwater.org

San Francisco Water Power Sewer
Services of the San Francisco Public Utilities Commission

San Francisco Water Power Sewer
Services of the San Francisco Public Utilities Commission

Hetch Hetchy POWER

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HHPower@sfwater.org

December 1, 2025

Ms. Angela Calvillo
Clerk of the Board of Supervisors
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

**RE: San Francisco Public Utilities Commission's Quarterly Report to the Board of Supervisors on the Status of Applications to PG&E for Electric Service.**

Dear Ms. Calvillo:

The attached quarterly report has been prepared for the Board of Supervisors (Board) in accordance with Resolution No. 227-18, approved by the Board on July 10, 2018 (File No. 180693), adopted on July 20, 2018, and re-affirmed on April 6, 2021. Pursuant to the Resolution, the San Francisco Public Utilities Commission (SFPUC) is required to "provide the Board a quarterly report for the next two years that identifies the following: status of all City projects with applications to SFPUC for electric service, including project schedules and financing and other deadlines; project sponsor and SFPUC concerns in securing temporary and permanent power, including obstacles that could increase costs or delay service to City customers; and the status of disputes with PG&E before the Federal Energy Regulatory Commission (FERC) or in other forums." We are providing this report to the Board to keep them informed of these issues.

**HIGHLIGHTS IN THIS QUARTER'S REPORT**

- 85 active projects have experienced interconnection delays or increased project costs due to PG&E's obstruction.
  - 1 project was canceled; and
  - 6 projects were added
- Total cost impact (additional project costs and loss of revenue to the City) of PG&E's obstructions since the first report submitted in November 2018 is approximately $74M.
  - The total cost impact to the City for the 85 projects featured in this quarter's report is more than $50M.
- FERC approved a settlement agreement between the City and PG&E on a set of issues related to PG&E's Wholesale Distribution Tariff on November 6, 2025.
  - FERC issued a favorable decision on the remaining two issues not included in the settlement on October 27, 2025.
- PG&E filed further tariff changes on October 25, 2024, which took effect May 25, 2025.
  - The City is currently engaged in FERC Settlement proceedings on this matter.
- San Francisco's Valuation petition at the California Public Utilities Commission (CPUC) is ongoing.

Should you have any questions about this report, please contact Barbara Hale, SFPUC Assistant General Manager, Power, at BHale@sfwater.org and 415-613-6341.

Sincerely,

Dennis J. Herrera
General Manager

**Daniel Lurie**
Mayor

**Joshua Arce**
President

**Stephen E. Leveroni**
Vice President

**Avni Jamdar**
Commissioner

**Kate H. Stacy**
Commissioner

**Meghan Thurlow**
Commissioner

**Dennis J. Herrera**
General Manager

OUR MISSION: To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.

**DECEMBER 2025 QUARTERLY REPORT**
**(Updates from September through November 2025)**

# I. Background

The San Francisco Public Utilities Commission (SFPUC) provides retail electric service from our Hetch Hetchy Power publicly-owned utility (Hetchy) to approximately 7,500 customer accounts by relying on our Hetch Hetchy generation and other sources for supply. The City and County of San Francisco (City) pays Pacific Gas and Electric Company (PG&E) about $67 million per year to provide transmission and wholesale distribution services regulated by the Federal Energy Regulatory Commission (FERC). PG&E's Transmission Owner (TO) Tariff and Wholesale Distribution Tariff (WDT) describes the terms and conditions of these purchased services. The City's Transmission Interconnection Agreement under the TO Tariff and the WDT Interconnection Agreement was set to expire this July, but PG&E has extended it till June 30, 2026. The City and PG&E began discussions on the new agreements on November 13, 2025. In September 2020, PG&E filed an update to the WDT (WDT3), that significantly decreased the City's ability to serve many City projects. PG&E and the City reached agreement on some of the disputed issues in this proceeding in a settlement that was approved by the Board of Supervisors in Ordinance 80-25 and then by FERC and became effective on November 6, 2025. Regardless of this agreement, PG&E continues to obstruct City projects with costly and unnecessary requirements, and delays necessitating on-going litigation. In addition to continuing efforts to fight for fair access to the grid in the near term, the City is seeking to purchase the PG&E-owned electric grid within San Francisco. This will allow San Francisco to expand the City's full-service publicly owned electric utility and eliminate our dependence on PG&E for electric service within the City.

## 1. Current Status of Projects Facing PG&E Obstruction

Since November 2018, 186 projects have been obstructed by PG&E, including four new projects this quarter. Please find attached the following documents related to this report.

- **Attachment A1, Projects with Active Applications** lists the 35 projects that have experienced interconnection delays, arbitrary requests for additional and/or unnecessary information, or increased project costs for the reporting period of September 2025 to November 2025. Updates and changes to projects since the previous quarterly report are detailed in Column O of Attachment A1.
- **Attachment A2, Projects Released for Retail PG&E Service under WDT3 and WDT4** lists the 50 City projects that were forced to get PG&E retail service due to PG&E's requirements or outrageous costs. These projects will pay the higher PG&E retail rates for electric service.
- **Attachment B, Map of Interconnection Issues** contains a map providing the location of each project, marked with an icon indicating the type of service provided.
- **Attachment C**, **Cost Impacts** contains a detailed report of each category of additional incurred costs and impacts to the City per project, such as redesign costs, construction and equipment costs, and additional staff time (these costs and impacts are also included in the 'Impacts' column of Attachment A1 and A2).

## II. Ongoing PG&E Protests and Litigation

### 1. WDT3 Litigation

PG&E's WDT3 filing eliminated service that the City has historically used to provide important City services. More specifically, PG&E required primary voltage service for all new or modified interconnections. Primary voltage equipment is large and expensive and is normally required for large developments. This requirement forces projects to either incur additional costs and lose usable project space to install unnecessary equipment or take service from PG&E retail instead of Hetchy. The main issues in the table below were litigated at FERC in the WDT3 proceeding. On May 17, 2024, a FERC Administrative Law Judge issued a favorable partial initial decision on the City's protest over PG&E's proposed costs for Upgrades and direct assigned facilities (issues 4 and 5 in the table below). The initial decision found that PG&E's treatment of the costs of Upgrades to the distribution system and direct assignment facilities used by the City under the WDT is unjust, unreasonable, and unduly discriminatory. PG&E did not challenge the initial decision's findings on the treatment of Upgrades. FERC issued a final decision affirming the initial decision. PG&E filed a Request for Rehearing on November 17, 2025.

The City and PG&E have reached a limited settlement agreement regarding the treatment of certain secondary voltage requests (issues 1-3 in the table below), requiring the City to pay a "Black Box Settlement Charge" to connect some of those customers. The City will continue to be limited to providing electric service at secondary voltage for only *certain categories of customers*, even if that is the technically appropriate voltage level, due to limitations imposed by PG&E. After approval by the San Francisco Public Utilities Commission, the Board of Supervisors approved the settlement on June 3, 2025, and the Mayor approved it on June 11, 2025. PG&E filed the settlement with FERC for its approval on August 11, 2025. FERC approved the settlement on November 6, 2025, and it has been in effect since.

Previously, while the settlement agreement was in the process of getting approval by FERC, PG&E obstructed the interconnection of small public safety related devices by bringing up issues unrelated to wholesale electric service, as well as being unresponsive to PUC's communications. Since then a portion of these public safety devices have been connected. However, as elaborated in section 4 below, PG&E has imposed unnecessary requirements for smaller devices attached to City-owned traffic controllers and streetlight poles and has made the implementation of some of the settlement terms tenuous.

| | | Infrastructure affected | Impact | Status |
|---|---|---|---|---|
| **1** | **Elimination of Service to Unmetered Load** | Streetlights, traffic signals, bus shelters, ShotSpotter devices, emergency sirens, street furniture, news racks, and similarly small electric loads often located in the public right of way. | All unmetered load served by Hetchy will need to install primary equipment to connect to the PG&E-owned grid or accept PG&E retail service to continue to receive electric service and function. | PG&E and the City have reached a settlement under the WDT3 case for specific types of devices. Implementation procedures currently imposed by PG&E are hindering the connection of these devices. |
| **2** | **Elimination of Service on PG&E's Downtown Network** | Downtown area (includes all of Market Street from Embarcadero through Civic Center.) | Connecting new loads or Upgrades to existing loads connected to the PG&E-owned grid in San Francisco's downtown area will be prohibited. | PG&E and the City have reached a settlement under the WDT3 case for specific categories of customers |

| | | | | |
|---|---|---|---|---|
| 3 | **Elimination of New Secondary Connections** | Most Hetchy municipal customers, like schools, public restrooms, libraries, parks, health clinics, firehouses, City department offices. | When existing facilities undergo renovations (like those for de-carbonization) they will need to install primary equipment to connect to the PG&E-owned grid or accept PG&E retail service to continue to receive electric service and function. | PG&E and the City have reached a settlement under the WDT3 case for specific categories of customers. |
| 4 | **Assignment of Costs for Upgrades to PG&E's System** | Any City project that PG&E decides requires an upgrade to PG&E's distribution system. | Projects are at risk of incurring excessive costs to upgrade PG&E's infrastructure and build out PG&E's grid. PG&E retail customers benefit from this, while PG&E makes a rate of return on this equipment. Since 2018 City projects have paid ~$13M to PG&E for these Upgrades. | PG&E did not challenge the initial decision that the cost of Upgrades is unjust, unreasonable, and unduly discriminatory. The City received a favorable final decision from FERC on this issue. This issue is also before FERC in the WDT4 proceeding. |
| 5 | **Costs for Direct Assignment Facilities** | Every City project needs direct assignment facilities to connect to PG&E's distribution system. | Projects are at risk of incurring excessive costs for Direct Assignment Facilities. PG&E charges its retail customers less than its wholesale customers for similar facilities. | PG&E challenged the initial decision that the cost of direct assignment facilities is unjust, unreasonable, and unduly discriminatory. The City received a favorable final decision from FERC on this issue. This issue is also before FERC in the WDT4 proceeding. |

## 2. WDT4 Filing and Protest

PG&E filed WDT4 on October 25, 2024. PG&E is seeking a 15% rate increase as well as an increase in its return on equity from 10.24% to 12.3%. While PG&E did not change the language from WDT3 on secondary voltage service, which the City protested, the WDT3 settlement (mentioned above), ensures that the City can continue to obtain secondary voltage service for certain types of projects under the WDT for another ten years. The cost issues the City protested in WDT3 (issues 4 and 5 above) remain in PG&E's WDT4.

The City filed a Motion to Intervene and Protest on November 15, 2024, which includes a request for a five-month extension on the effective date of WDT4. FERC granted this extension request on December 23, 2024, and pushed the effective date of WDT4 to May 25, 2025. Parties including the City, PG&E, and other WDT customers are engaged in the FERC mediation process. Offers are being exchanged. The next settlement conference is scheduled for December 17, 2025.

## 3. FERC Orders on Remand – Grandfathering and Voltage

**Grandfathering** – On October 20, 2022, FERC ruled in the City's favor and confirmed that the City can continue to provide public power to broad categories of municipal customers that it has been serving since

1992, without new electrical facilities. The types of customers that were grandfathered include City departments and agencies as well as related entities that serve a civic purpose like schools, museums, public housing, and tenants on City property. Though this was a favorable decision, PG&E has not changed its previous practices. PG&E has appealed FERC's order and the City has intervened in that appeal. PG&E filed its brief in that appeal with the D.C. Circuit on August 29, 2023. FERC submitted its brief on November 27, 2023, the City filed its intervenor brief on December 4, 2023, and PG&E filed a reply brief on January 16, 2024. The City participated in oral arguments before the D.C. Circuit Court of Appeals on May 1, 2024. On August 23, 2024, the D.C. Circuit ruled in favor of PG&E finding that FERC's class-based interpretation of the grandfathering provision to be improper. The D.C. Circuit heavily relied on a recent Supreme Court ruling that has overturned decades-long precedent that gave administrative agencies deference while interpreting federal laws. The Court vacated and remanded the issue back to FERC. We are awaiting FERC's decision on remand that will clarify which specific customers or points of delivery qualify for grandfathering. The effect of any FERC decision in this matter will be limited, because the WDT3 settlement allows the City to continue to serve loads that we have argued are grandfathered.

**Voltage**– On December 15, 2022, FERC ruled in the City's favor and took issue with PG&E's requirement of primary voltage service in most cases. The parties have reached a limited-term agreement on these issues that allows a limited number of projects to move forward with secondary service for five years. The Board approved the settlement on February 6, 2024 in Ordinance No. 27-24. The WDT3 Settlement, described above, further expanded the types of projects that can receive secondary service.

**4. Unmetered Load**

As noted above, PG&E's WDT no longer offers secondary service to the City and other wholesale customers, including service to the City's unmetered loads, which are mainly streetlights, traffic signal systems, and similar small, predictable municipal loads that are billed based on FERC-approved usage formulas rather than metered usage. To operate these loads, the City either must pay more for PG&E retail service or spend more than $1 billion for large primary equipment that is unnecessary for safety or reliability purposes and causes City-wide disruptions.

PG&E and the City had an agreement in place that allows the City to continue to provide unmetered service to these loads during the pendency of the WDT3 matter at FERC. This issue has been resolved under the WDT3 settlement agreement mentioned above. Under the settlement, the City will be able to continue to provide unmetered service to City streetlights, traffic signal controllers, bus shelters, and other temporary loads connected to City street lighting circuits that do not exceed 150 watts each. All other small loads connected to the street lighting circuits (i.e. wireless facilities, license plate readers) will need to be metered.

Recently, PG&E notified the City of several requirements for connecting the Distributed Antenna Services (DAS) for wireless phone companies on existing City-owned streetlight and traffic signal circuits which includes a separate application and $1,500 fee for each DAS installation. PUC believes these requirements are unreasonable as the DAS devices take little power (akin to plugging in an additional lamp in a home). The DAS will be connected to existing PUC circuits and do not affect the WDT interconnections. SFPUC staff are currently in discussions with PG&E staff regarding these requirements.

## Attachment A1: Projects with Active Applications

| A | B | C | D | E | F | G | H | I | J | K | L | M | | N | O |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | PG&E NN# | Project Location | District # | Client Organization | Project Description (what SF applied for) | Project Status | | Initial Application Submittal Date | App Deemed Complete Date | Initial Service Need Date | Did PG&E require Primary? | Load Size/Can Be Served at Secondary | Did PG&E require a System Impact Study? (Y/N) | Impacts | Updates/Changes since Last Report (September 2025) |
| 1 | 126363173 | 499 Sea Cliff Avenue - Pump Station and Force Main | 1 | SFPUC -Water | Increase in Contract Demand for existing secondary service | Delays caused by dispute over primary vs. secondary. Project is moving forward with secondary. | In construction | 1/23/2023 | 6/13/2023 | 9/2/2024 | Yes | 30 kW/ Yes | Y | **Delay Impact:** PG&E initially rejected the project claiming there was a change in physical location, but later determined that there was not and then required multiple site visits to determine whether an SIS was required even though the requested load is very small (4 months).PG&E did not provide the final Service Agreement on time (2 months). Further delays caused by PG&E not completing the box replacement on time due to not having the approved material on site. (Delay impacts TBD).<br><br>**Cost Impact:** PG&E is charging the project ~$18k for Upgrades to their own distribution system that will benefit PG&E's retail customers. | Updated Column O to include further delays caused by PG&E. |
| 2 | 112434942 | 3455 Van Ness Avenue - AWSS Pump Station No. 2 | 2 | SFPUC - Water | Remove two existing services and replace with one secondary service | Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1) | In construction | 12/9/2016 | 1/5/2017 | 8/1/2017 | Yes | 144 kW/Yes | N | **Delay Impact:** PG&E not providing necessary cost detail to the Service Agreement (7 months).<br><br>**Cost Impact:** Additional project costs - $75k (interrupter, #7 box, installation). PG&E charging the project ~$193k for Upgrades to their own distribution system that will benefit PG&E's retail customers. | No impacts update. |
| 3 | 126693698 | 850 Turk Street - Affordable Housing | 2 | MOHCD | New permanent service | Delays caused by PG&E not providing the Service Agreement within a reasonable timeframe. | In construction | 4/13/2023 | 7/24/2023 | 4/1/2025 | No | 630/Yes | N | **Delay Impact:** PG&E not providing delaying the final service agreement (~2.5 months).<br><br>**Cost Impact:** PG&E charging the project ~$58k for Upgrades to their own distribution system that will benefit PG&E's retail customers. | Project added. |
| 4 | 125384204 | 1135 Powell Street-Chinatown Branch Library | 3 | SFPW | Temporary De-energization | Delays caused by PG&E claiming subsurface transformer shortages. | In construction | 11/29/2022 | 1/25/2023 | 1/1/2026 | No | 106 kW/Yes | N | **Delay Impact:** TBD - PG&E claims there is an industry-wide subsurface transformer shortage.<br><br>**Cost Impact:** TBD | No impacts update. |
| 5 | Several applications submitted | 19th Avenue - Traffic Signals | 4 & 7 | SFMTA | New unmetered secondary services (several traffic signals) | Delays caused by PG&E cancelling the initial applications. Project moving forward with PG&E retail service. | In construction | Various | 3/14/2017 | 9/1/2019 | No | N/A | N | **Delay Impact:** PG&E delayed the project by cancelling the existing contracts even though SF had completed and paid for the applications and paid for extensions. Project is looking to move forward to just reuse the existing service in an effort to not delay the project any further.<br><br>**Cost Impact**: TBD | No impacts update. |
| 6 | Several applications submitted | L Taraval - Streetlights | 4 | SFMTA | New unmetered secondary services (streetlights - over 31 locations) | Delays caused by PG&E being unresponsive. Now PG&E is causing further delays by requiring a redesign. Project moving forward with PG&E retail service. | In construction | 3/19/2019 | 4/27/2019 | 10/10/2023 | No | N/A | N | **Delay Impact:** Pedestrian and traffic safety is at risk as PG&E delays the energization of these streetlights. Delays continue as PG&E has canceled these applications which will cause redesign and change orders. PG&E has again required redesigns. These delays will further impact the construction schedule.<br><br>**Cost Impact:** TBD | No impacts update. |
| 7 | 126151668 | 2550 Irving Street - Mixed Use, Affordable Housing (90 units) | 4 | MOHCD | New secondary service | Delays caused by PG&E claiming subsurface transformer shortages. | Energized | 4/10/2023 | 5/17/2023 | 10/1/2024 | No | 521 kW/ Yes | N | **Delay Impact:** PG&E is claiming there is an industry-wide subsurface transformer shortage. Additional delays caused by PG&E delaying the Final Service Agreement by ~5 months.<br><br>**Cost Impact:** PG&E charging the project ~$2k for Upgrades to their own distribution system that will benefit PG&E's retail customers. | Project was energized on 10/24/2025, and will be taken off of the next report. |
| 8 | Several applications submitted | Haight Street - Traffic Signals | 5 | SFMTA | New unmetered secondary services (several traffic signals) | Delays caused by PG&E cancelling the initial applications. | In construction | 4/22/2020 | 7/16/2020 | 11/30/2020 | Yes | N/A | N | **Delay Impact:** Project delayed as PG&E canceled the original applications. Public safety is at risk as the traffic signal infrastructure is completed and are just awaiting energization. The public has been inquiring about signal activation status.<br>The traffic signals are moving forward, but there are disagreements on whether or not unmetered holiday lighting can be added to these poles.<br><br>**Cost Impact:** TBD | No impacts update. |
| 9 | Several applications submitted | Folsom Streetscape - Traffic Signals & Safety Streetlighting | 6 | SFMTA | New unmetered secondary services (several traffic signals) | Delays caused by PG&E cancelling applications and being un-responsive. | Project cancelled | 7/23/2020 | Various | Fall 2023 | No | N/A | N | **Delay Impact**: Delays continue as PG&E has canceled some applications which will cause redesign and change orders. These delays will impact the construction schedule. This project has been canceled and had to apply to PG&E retail service due to PG&E viewing the proposed design of adding a pull box for safety purposes as a major redesign. Due to this, PG&E did not allow a replacement of the existing service even though the traffic signals would be serving the same intersection and the streetlights would be serving the same geographical area under the Interim Unmetered Load Agreement.<br><br>**Cost Impact:** TBD | This project has been cancelled and will be removed from the next report. |
| 10 | 116790877 | Market Street & 7th Street - BMS Switch | 6 | SFMTA | New secondary service | Delays caused by PG&E not following WDT timelines and not providing cost explanations. | In construction | 3/6/2019 | 4/9/2019 | 1/4/2021 | No | 48 kW/Yes | N | **Delay Impact:** PG&E was late in providing the service agreement and was unresponsive in providing further cost explanation. Project to be energized by 3/23/2027. Further delays caused by PG&E delaying construction by ~1 month, and also retracting their stance from more than 4 months ago on a design change at the energization stage.<br><br>**Cost Impact:** TBD | Updated impacts column O to included further delays. |

## Attachment A1: Projects with Active Applications

| | PG&E NN# | Project Location | District # | Client Organization | Project Description (what SF applied for) | Project Status | | Initial Application Submittal Date | App Deemed Complete Date | Initial Service Need Date | Did PG&E require Primary? | Load Size/Can Be Served at Secondary | Did PG&E require a System Impact Study? (Y/N) | Impacts | Updates/Changes since Last Report (September 2025) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 11 | N/A | Transbay Transit Center - Transbay Joint Powers Authority | 6 | SFPUC - Power | Two new primary services (5 MW each) | Potential dispute over reserved capacity and project true-up costs. | Energized | 9/12/2018 | 2/6/2019 | 10/1/2018 | N/A | 10 MW/No | N | **Delay Impact:** None - project is energized.<br><br>**Cost Impact:** PG&E has requested an additional ~$5M from SF in an extremely late project true-up request. PG&E has yet to provide adequate justification for this amount. PG&E is requesting another additional ~$4.5M in another extremely late project true-up request. | Updated Column O to include additional cost impacts. |
| 12 | 122206857/ 128708098 | *77 Harriet Street - Gene Friend Rec Center<br><br>(formerly 270 6th Street) | 6 | SFRPD | New secondary service | Increased costs due to PG&E's primary requirements. Project moving forward with secondary. Project anticipates further delays caused by PG&E delaying the final Service Agreement delivery. | Primary application has been canceled.<br><br>In construction | 8/16/2021 | | 7/3/2023 | Yes | 348 kW/Yes | N | **Delay Impact:** Delays caused by PG&E initially requiring primary. Further delays caused by PG&E not providing the final Service Agreement (SA) on time. (~4 months). This delay will lead to further displacement of a violence prevention and youth development organization for an additional year.<br><br>**Cost Impact**: PG&E charging the project ~$340k for Upgrades to their own distribution system that will benefit PG&E's retail customers. | Updated Project status as well as impacts column O to include the final Upgrade costs. |
| 13 | 125991771 | 2098 Alameda Street - Stormwater Project | 6 | SFPUC - Water | New primary service | Delays caused by PG&E extending timeline for Draft System Impact Study | PG&E to provide Final Service Agreement by 4/6/2026 | 12/15/2022 | 4/25/2023 | 2/1/2023 | N/A | 7200 kW/No | Y | **Delay Impact:** PG&E requested additional time on System Impact Study draft (1 month). PG&E has also delayed Final Service Agreement submission by ~2months. PG&E has further delayed the submission of the Final Service Agreement by ~4 months. Further delays caused by PG&E delaying the submission of the Final Service Agreement by an additional ~2 months.<br><br>**Cost Impact:** TBD | Updated Column O to include additional delays caused by PG&E. |
| 14 | N/A | 460 Jessie Street - Cordia Steam Loop (Transmission Level Service) | 6 | SFPUC | New primary service | Delays caused by PG&E not providing System Impact Study on time. | PG&E to provide System Impact Study. | 5/11/2023 | 6/13/2023 | 10/15/2026 | N/A | 25 MW/No | N | **Delay Impact:** Delays caused by PG&E delaying System Impact Study by ~8 months.<br><br>**Cost Impact:** Project anticipates high Upgrade costs of over $100M. | No impacts update. |
| 15 | 117062979 | 995 Market Street - New Streetlights and Traffic Controllers | 6 | SFMTA | New secondary service | Delays caused by PG&E pushing energization date. | Energized | 4/18/2019 | 6/28/2019 | 6/5/2018 | N/A | N/A | N | **Delay Impact:** Project was initially in dispute due to PG&E no longer allowing secondary service for unmetered load. Project eventually moved forward with secondary service under an agreement between the SF and PG&E. Delays caused by PG&E delaying a four-hour service connection for this project to January 2025, even after the project received a clear for construction on 7/17/2024.<br><br>**Cost Impact:** TBD | Project has been energized and will be taken off of the next report. |
| 16 | 127414476 | 3500 Great Highway - Oceanside Recycled Water & Water Pollution Control Plant | 7 | SFPUC | 1) Increase in Contract Demand to existing primary service.<br><br>2) Interconnection Agreement Application for Generating Facility | Delays caused by PG&E providing the System Impact Study late.<br><br>Delays caused by PG&E's lack of coordination, providing prompt technical review feedback, or field shutdown and inspection support. | Primary service application cancelled<br><br>Generating facility shutdown completed. | 10/4/2022<br><br>4/2/2014 | 10/21/2022<br><br>8/15/2018 | 11/29/2022<br><br>9/1/2020 | N/A<br><br>N/A | 5,200 kW/No (Existing is 2,635 kW)<br><br>N/A | N<br><br>N | **Delay Impact:** Initial delays caused by PG&E not providing the System Impact Study (SIS) report on time. PG&E requested 4 month extension from original due date of 4/18/2023 to 8/11/2023, and then finally submitted the SIS report on 12/8/2023. This is a 160 business days delay. Further delays caused by PG&E delaying the delivery of the revised SIS from 11/25/2024 to 2/3/2025 this is an additional 45 business days delay.<br><br>The generating facility delays have been caused by numerous requests for PG&E to provide technical review feedback for compliance with the interconnection agreement. SFPUC awaited the final review, approvals and field shutdown coordination from PG&E for the existing power service interconnection. Further delays caused by PG&E stating that the generating facility application must be applied for under PG&E Retail (Rule 21). (Delay timeline TBD).<br><br>**Cost Impact:** These delays above have time/cost impacts and are estimated to be $14M or more. These costs include ~$9.4M in contractor claims regarding the delays; and ~$4.6M in extended overhead project costs. | No impacts update. |
| 17 | N/A | Twin Peaks & Panorama Boulevard - Traffic Security Gate | 7 | SFMTA | New service tap off of existing traffic signal circuit | Delays caused by PG&E no longer allowing unmetered load. | SF and PG&E discussing possible path forward. | N/A | N/A | N/A | N/A | .025 kW/Yes | N | **Delay Impact:** Delays caused by PG&E no longer allowing unmetered load. Further delays may cause potential public safety issues.<br><br>**Cost Impact:** TBD | No impacts update. |
| 18 | 129333964 | *5 Lenox Way - West Portal Elementary School | 7 | SFUSD | Upgrade existing secondary service | Delays caused by PG&E requesting modifications to site plan | PG&E to provide final Service Agreement by 3/16/2026. | 10/31/2023 | 8/5/2024 | 6/25/2024 | N/A | 900 kW/Yes | N | **Delay Impact:** Delays caused by PG&E delaying draft Service Agreement (~4 months).Further delays caused by PG&E's long WDT timelines including delaying the submission of the final SA by ~1.5 months.<br><br>**Cost Impact:** PG&E's redesign cost the project team an additional ~$4,500. Project anticipates ~$750k in additional costs to maintain current and to install additional diesel generators due to long PG&E WDT timelines. | Updated impacts column O to include further delays and anticipated costs caused by PG&E. |

## Attachment A1: Projects with Active Applications

| | PG&E NN# | Project Location | District # | Client Organization | Project Description (what SF applied for) | Project Status | | Initial Application Submittal Date | App Deemed Complete Date | Initial Service Need Date | Did PG&E require Primary? | Load Size/Can Be Served at Secondary | Did PG&E require a System Impact Study? (Y/N) | Impacts | Updates/Changes since Last Report (September 2025) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 19 | Several applications submitted | 16th Street Improvement Project - Traffic Signals | 8 & 9 | SFMTA | New unmetered secondary services (several traffic signals) | Delays caused by PG&E cancelling the initial applications. | In construction | Various | Jun-Jul 2017 | 1/1/2022 | N/A | N/A | N | **Delay Impact:** PG&E delayed the project by canceling the existing contracts even though we had completed and paid for the applications and paid for extensions. Project is looking to move forward to just reuse the existing service in an effort to not delay the project any further.<br><br>**Cost Impact:** TBD | No impacts update. |
| 20 | 123635730 | 2500 Mariposa Street - Potrero Yard Modernization (Mixed Use) | 9 | SFMTA | New primary service | Potential delays caused by PG&E not providing the System Impact Study draft on time. | PG&E to provide final Service Agreement by 2/24/2026. | 12/10/2021 | 5/19/2022 | 6/1/2023 | N/A | 11,000 kW/No | Y | **Delay Impact:** Delays caused by PG&E not providing the System Impact Study (SIS) report on time and requesting that the project reduce the total load size for both the industrial use and mixed-use applications together to not exceed 12,000 kW, due to PG&E claiming limited available grid capacity. Given this, the project canceled the industrial use application below and updated the load size of the mixed-use application from 7,800 kW to 11,000 kW. This load size increase triggered a new SIS which has caused further delays to a 3-level bus yard (involving battery electric bus infrastructure) and an affordable housing development project (up to 575 units.)<br>Due to these delays, the new permanent power need date has been updated to July 2027. Further delays caused by PG&E delaying the final SA by ~ 5 months.<br><br>**Cost Impact:** According to the draft Service Agreement, PG&E is estimating ~$11.7M in construction costs which includes 11,110 feet of trenching to the Potrero Substation. This will likely make the project infeasible. This will likely make the project infeasible. | Updated impacts column O to reflect additional delays. |
| 21 | 123044737/ 127547587 | *300 Bartlett Street (Mission Branch Library) | 9 | SFPW | Increase in Contract Demand to existing secondary service. | Delays caused by PG&E initially requiring primary. Project moving forward with secondary. Further delays caused by PG&E requiring a re-design, and claiming subsurface transformer shortages. | In construction | 2/26/2020 | 3/1/2022 | 8/1/2022 | Yes | 190 kW/Yes | N | **Delay Impact:** Project delayed - project was in dispute from Feb. 2020 - Jun. 2021 (15-16 months). Further delays were caused by PG&E requiring a redesign even though the design was agreed upon months ago. Additional delays were caused by PG&E moving the deadline for the primary design from 6/5/2023 to 9/7/2023.<br><br>**Cost Impact:** TBD | No impacts update. |
| 22 | 129144131 | 1515 South Van Ness Avenue (Casa Adelante) - Mixed Use, Affordable Housing (168 units) | 9 | MOHCD | New secondary service for perm. | Delays caused by PG&E not providing the final Service Agreement on time | In construction | 4/5/2024 | 6/28/2024 | 4/1/2025 | No | 859 kW/ Yes | N | **Delay Impact:** Project delayed due to PG&E delaying the final Service Agreement by 1 month. Further delays caused by PG&E not providing the final SA and at-risk inspection on time (1 month)<br><br>**Cost Impact:** Temp. construction power service by PG&E at retail - $224k in lost gross revenue to SFPUC. $69k in additional power costs to the project due to PG&E's higher rates. PG&E is estimated to charge the project ~$367k for Upgrades to their own distribution system that will benefit PG&E's retail customers. | Updated impacts column O to include further delays caused by PG&E. |
| 23 | 128015642 (Phase 2: 1.6MW)<br><br>128015642 (Phase 2: 7.71MW) | 529 Harmonia Street - Sunnydale HOPE (Two Phases) | 10 | SFPUC - Power | New primary service - phased approach | Delays caused by dispute over capacity. Project is moving in phases now and PG&E has agreed to providing the full capacity request by SF. | Phase 2 (multiphase): SF is working with PG&E to provide interim capacity increase to 1.6MW.<br><br>PG&E to provide Draft/Initial Service Agreement and Invoice for the full 7.7MW capacity. | 8/3/2023 | 1/9/2024 | 7/3/2034 | N/A | 7,710 kW/ No | Y | **Delay Impact:** Delays caused by PG&E unilaterally significantly reducing the load requested and not responding to SF's questions regarding load calculations in the System Impact Study draft agreement. Due to the urgency of the project, SF has agreed to move forward with PG&E's lower load calculations and will apply to PG&E for additional capacity when the load ramps up. Project has interim capacity needs between phase 1 and phase 2 of this project and anticipates PG&E not being able to meet the necessary energization timelines requested.<br>Phase 1 included switchgear (permanent delivery point for the project) and initial service point energization. SF is working with PG&E to provide additional capacity for phase 2 (multiphase) expansion. Further delays caused by PG&E delaying the delivery of the Facilities Study (~6 months).<br>SF has had to agree to splitting the Phase 2 application to avoid delays to the interim capacity increase of 1.6 MW.<br><br>**Cost Impact:** PG&E is requiring SF to construct offsite infrastructure for PG&E to serve the load that is typically done by PG&E - cost is TBD.<br>PG&E is charging the project ~$4.4M for Upgrades to their own distribution system that will benefit PG&E's retail customers. | No impacts update. |

## Attachment A1: Projects with Active Applications

| | PG&E NN# | Project Location | District # | Client Organization | Project Description (what SF applied for) | Project Status | | Initial Application Submittal Date | App Deemed Complete Date | Initial Service Need Date | Did PG&E require Primary? | Load Size/Can Be Served at Secondary | Did PG&E require a System Impact Study? (Y/N) | Impacts | Updates/Changes since Last Report (September 2025) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 24 | 115583820 (Phase 1)<br><br>128078606 (Phase 2) | 1108 Connecticut Street - HOPE Potrero (Two Phases) | 10 | SFPUC - Power | New primary service - phased approach | Delays caused by dispute over capacity. Project is moving in phases now and PG&E has agreed to providing the full capacity request by SF. Further delays caused by PG&E delaying the final Service Agreement for Phase 1. | Phase 1: Energized on 4/8/2025<br><br>Phase 2: PG&E to provide Final Service Agreement | 12/13/2018<br><br>7/28/2023 | 4/4/2019<br><br>1/23/2024 | 6/1/2019<br><br>7/1/2030 | N/A | 947 kW/No (original request was for 4,000 kW)<br><br>18,750 kW/ No | Y | **Delay Impact:** Delays caused by PG&E unilaterally significantly reducing the load requested and not responding to SF's questions regarding load calculations in the System Impact Study draft agreement. Due to the urgency of the project, SF has agreed to move forward with PG&E's lower load calcs and will apply to PG&E for additional capacity when the load ramps up. PG&E's long lead time for engineering/ design may cause delay in Temporary Certificate of Occupancy (TCO) of new buildings. Phase 1 of this project has been delayed due to PG&E delaying the draft Service Agreement by ~2 months.<br><br>**Cost Impact:** PG&E is requiring SF to construct offsite infrastructure for PG&E to serve the load that is typically done by PG&E - cost is TBD.<br>PG&E is charging the project ~$13M for potential Upgrades to their own distribution system that will benefit PG&E's retail customers. | No impacts update. |
| 25 | 116967240 | 702 Phelps Street - SFMTA Substation | 10 | SFMTA | Request to increase loads | Delays caused by PG&E being late in providing the System Impact Study report. | In construction | 2/26/2019 | 6/28/2019 | 5/1/2019 | N/A | 4000 kW/No | Y | **Delay Impact:** Delays caused by PG&E not providing the System Impact Study report on time (~4 months). More delays caused by PG&E not providing the Service Agreement on time.<br>Further delays caused by PG&E not providing enough design detail with the Service Agreement, changing the design, and pushing back the completion of final design by 6 months.<br><br>**Cost Impact:** TBD | No impacts update. |
| 26 | 114529750/ 121353271 | 1920 Evans - Arborist Trailer/BUF Yard | 10 | SFPW | New secondary service | Delays caused by issues with overhead poles. | In construction | 4/16/2018 | 8/10/2018 | 10/1/2018 | No | 37 kW/Yes | N | **Delay Impact:** Project has been delayed due to issues with an overhead pole. PG&E's proposed design was not feasible as it required overhead poles to be installed above underground sewer utilities. Project was further delayed when PG&E's re-design took several months. PG&E continued to delay Final Service Agreement submission from 4/6/2023 to 9/8/2023. Labor availability issues have further delayed this project.<br><br>**Cost Impact:** PG&E charging the project ~$54k for Upgrades to their own distribution system that will benefit PG&E's retail customers. | No impacts update. |
| 27 | 128611830 | 1301 Cesar Chavez - Islais Creek - BEB Charging Infrastructure | 10 | SFMTA | Upgrade of existing secondary service | Additional costs to be incurred due to PG&E's high Upgrade costs. | In construction | 1/12/2024 | 4/22/2024 | 5/1/2026 | N/A | 838 kW/ Yes | N | **Delay Impact:** Delays caused by PG&E not providing the final Service Agreement (SA) on time. (~7 months). Additional delays caused by PG&E further delaying providing the final SA by an additional ~1.5months.<br><br>**Cost Impact:** PG&E is charging the project ~$300k for Upgrades to their own distribution system that will benefit PG&E's retail customers. | Updated project status and column O to include actual costs of Upgrades incurred by the project. |
| 28 | 132010187 | 1001 Potrero - General Hospital (2403 23rd St) | 10 | SFDPH | New primary service | Delays caused by PG&E refusing to move forward with WDT application for emergency power. | Project is at a standstill. | 1/15/2025 | | 1/1/2026 | N/A | 3,591 kW/ No | N | **Delay Impact:** Delays caused by PG&E refusing to allow project to move forward with a WDT application for back-up power in the case of an emergency, and encouraging the project to be released to PG&E Retail in order to be served. PG&E is citing capacity and inadequate compensation concerns under the WDT for their refusal. Further delays caused by PG&E being unresponsive on meeting request dates (~1 month).<br><br>**Cost Impact:** TBD. | Updated column O to include further delays caused by PG&E. |
| 29 | | 455 Athens Street - Cleveland Elementary School | 11 | SFUSD | Upgrade and relocation of existing secondary service | Delays caused by dispute over primary vs. secondary. Project is moving forward with primary. | In construction | 10/26/2020 | 1/28/2022 | 6/1/2021 | Yes | 305 kW/Yes | N | **Delay Impact:** Delays caused by PG&E providing the Service Agreement late. Project delays can lead to potential delay in school building opening which may result in only partial occupancy of building for 2023-24 school year and beyond. PG&E originally promised to provide the final Service Agreement no later than May 2023. However, PG&E further delayed the final Service Agreement to August 2023. Further delays caused by PG&E rescinding approval for previously approved underground infrastructure.<br><br>**Cost Impact:** Due to the above delay the project will incur a monthly general contractor contract extension fee of approximately $20k per month with a total of approximately $240k for a one-year delay in construction. Additional project costs for primary service with $345k for primary switchgear and related labor costs. | No impacts update. |

## Attachment A1: Projects with Active Applications

| | PG&E NN# | Project Location | District # | Client Organization | Project Description (what SF applied for) | Project Status | | Initial Application Submittal Date | App Deemed Complete Date | Initial Service Need Date | Did PG&E require Primary? | Load Size/Can Be Served at Secondary | Did PG&E require a System Impact Study? (Y/N) | Impacts | Updates/Changes since Last Report (September 2025) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 30 | 123409909 | 2340 San Jose Avenue - Affordable Housing (138 units) | 12 | MOHCD | New secondary service | Delays caused by dispute over primary vs. secondary. Project moving forward with secondary. | Phase 1 energized<br>Phase 2 energized | 11/21/2019 | 4/25/2022 | 5/1/2020 | Yes | 800 kW/Yes | N | **Delay Impact:** Project was in dispute from Jan. 2020 to Sept. 2021 (20-21 months). Further delays incurred so project is now being split into two phases. PG&E delayed providing the final Service Agreement (1 month). Both phases have been energized, however PG&E still has work to complete on their end.<br><br>**Cost Impact:** Temp. construction power service by PG&E at retail with $191k in lost gross revenue to SFPUC. $34k in additional power costs to the project due to PG&E's higher rates. PG&E is charging the project $715k for Upgrades to their own distribution system that will benefit PG&E's retail customers. Project team anticipates large true-up due to PG&E's outstanding work post energization. (Cost impact TBD). | Both phases of this project have been energized. However, updated impacts column O to include anticipated costs. |
| 31 | Several applications submitted | Contract 65 - Traffic Signals (Various locations) | Various | SFMTA | New unmetered secondary services (several traffic signals) | Delays caused by PG&E cancelling applications and being un-responsive. Project moving forward with PG&E retail service. | In construction | 1/16/2020 | Various | Spring 2023 | No | N/A | N | **Delay Impact:** PG&E has canceled some applications which will cause redesign and change orders. These delays will impact the construction schedule. Furthermore, such cancellations have delayed resolving ongoing pedestrian safety issues. Additional delays have been caused due to PG&E's failure to maintain their electrical equipment that needs to be replaced (~1 month). More delays caused by PG&E refusing to accommodate project team's request to complete onsite work at night (~2 months). Some applications under this project have been canceled due to PG&E claiming that they have not been able to complete their end of construction including replacing cables.<br><br>**Cost Impact:** TBD | No impacts update. |
| 32 | 122406887 | 1900 El Camino Real - Water Testing Equipment | N/A | SFPUC | New secondary service | Delays caused by PG&E not providing the Service Agreement within a reasonable timeframe. | In construction | 10/30/2020 | 3/1/2021 | 5/31/2019 | No | 2 kW/Yes | N | **Delay Impact:** PG&E has been performing engineering/design since March 2022. PG&E's timeline for completion was pushed back from July 2022 to October 2022 (3 months).<br><br>**Cost Impact:** TBD | No impacts update. |
| 33 | N/A | Multiple Service Transfers | N/A | Various City Depts. | Service Transfers | Delays caused by PG&E requiring unnecessary equipment or information for service transfer requests. | Project is at a standstill. | N/A | N/A | N/A | N/A | N/A | N | **Delay Impact:** Project not being able to move forward.<br><br>**Cost Impact:** Additional costs and staff resources can be incurred if PG&E continues to create barriers for SF service transfer requests.<br>SF continues to experience loss of revenue and additional power costs as PG&E is refusing to transfer over City department loads. | No impacts update. |
| 34 | 121592273 | 950 Antoinette Lane - Well Pump & Control Panel | N/A - South SF | SFPUC | Remove two existing services and replace with one secondary service | Delays caused by dispute over primary vs. secondary. Project moving forward with secondary. | In construction | 11/19/2020 | N/A | 12/5/2021 | Yes | 49 kW/Yes | N | **Delay Impact:** Project was in dispute from Feb. - April 2021 (1-2 months).<br>Further delays caused by PG&E providing the final design late (4 months).<br><br>**Cost Impact**: PG&E charging the project $173k for Upgrades to their own distribution system that will benefit PG&E's retail customers. | No impacts update. |
| 35 | 131368806 | 1000 El Camino Real - Plumbing Shop Building | N/A - South SF | SFPUC | Permanent disconnect of existing service and close account. | Delays caused by PG&E delaying submission of the Work Performance Agreement. | In construction | 5/23/2025 | 6/16/2025 | 6/16/2025 | N/A | N/A | N/A | **Delay Impact:** Delays caused by PG&E delaying the Work Performance Agreement by ~2 months.<br><br>**Cost Impact**: TBD | Project added. |

Notes:
1. Low-side metering is not the same as secondary service. Low-side metering requires extra equipment costs (i.e. an interrupter, approx. $75k). The SFPUC believes that many of these loads should be served with secondary service, but has compromised with PG&E to move projects forward.
2. Cost impacts related to lost revenue are estimates calculated off of projected load values.
3. Not all cost impacts are reflected here as increased facility and construction costs are still to be determined.
4. Delay impacts are only calculated off of the time in which PG&E and SF were in dispute. (Other delays are not included)
5. Primary switchgear is estimated to cost an additional $500k.

Key
- Project is currently being disputed or has been delayed due to a dispute/issue and is past the Initial Service Need Date (Column K).
- Energized, but still facing issues.
- Project is moving forward, but not yet energized. Some are still facing major delays. Please review the impact column for further descriptions.
- Project has been energized - no outstanding issues.

* These projects are moving forward under the Voltage Settlement.

## Attachment A2: Projects Released to Retail PG&E Service under WDT3 and WDT4

| A | B | C | D | E | F | G |
|---|---|---|---|---|---|---|
| | Project Location | District # | Client Organization | Project Description (what SF applied for) | Impacts | Updates/Changes since Last Report (September 2025) |
| 1 | 499 Seacliff Avenue - Pump Station and Force Main | 1 | SFPUC | New temporary secondary service | $19k in lost gross revenue to SFPUC for duration of temporary service. $5k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 2 | 100 Seacliff Avenue - Pump Station | 1 | SFPUC | New temporary secondary service | $147k in lost gross revenue to SFPUC for duration of temporary service. $27k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 3 | 970 47th Avenue - Golden Gate Park Clubhouse (Temporary trailer) | 1 | SFRPD | New temporary secondary service | Project has been delayed several months. SF originally applied for service before WDT3 and after months of back and forth, PG&E stated they could not provide the service.<br>$21k in lost gross revenue to SFPUC for duration of temporary service. $33k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 4 | 4200 Geary Boulevard - Affordable Housing (Construction power) | 1 | MOHCD | New temporary secondary service | $45k in lost gross revenue to SFPUC for duration of temporary service. $8k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 5 | 850 Turk Street - Affordable Housing (Construction power) | 2 | MOHCD | New temporary secondary service | $944k in lost gross revenue to SFPUC for the duration of temporary service. $167k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 6 | 750 Golden Gate Ave - Affordable Housing (Construction power) | 2 | MOHCD | New temporary secondary service | $1.4M in lost gross revenue to SFPUC for the duration of temporary service. $513k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 7 | 750 Golden Gate Ave - Affordable Housing | 2 | MOHCD | New permanent secondary service | $1.1M/yr. in lost gross revenue to SFPUC. $403k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 8 | 346 Post Street - SFPD Command Van | 3 | SFPD | New temporary secondary service | $2k in lost gross revenue to SFPUC for the duration of temporary service. $4k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 9 | 822 Geary Street - Overdose Prevention and Crisis Stabilization | 3 | DPH | New permanent secondary service | $78k/yr. in lost gross revenue to SFPUC. $81k/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 10 | Seawall Lots 323 & 324 - Hotel & Theater (Construction power) | 3 | Teatro Zinzanni | New temporary secondary service | $132k in lost gross revenue to SFPUC for duration of temporary service. $4k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 11 | 2001 Embarcadero Street -Port SkyStar Observation Wheel (Temporary power) | 3 | SFRPD/PORT | New temporary secondary service | $737k in lost gross revenue to SFPUC for duration of temporary service. $228k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 12 | 2550 Irving Street - Affordable Housing (Construction power) | 4 | MOHCD | New temporary secondary service | $256k in lost gross revenue to SFPUC for duration of temporary service. $30k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 13 | Sunset Boulevard & Lawton Street - Recycled Water Irrigation Pump | 4 | SFPW | New permanent secondary service | $15k/yr. in lost gross revenue to SFPUC. $25k/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 14 | Sunset Boulevard & Taraval Street - Recycled Water Irrigation Pump | 4 | SFPW | New permanent secondary service | $15k/yr. in lost gross revenue to SFPUC. $25k/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 15 | Sunset Boulevard & Yorba Street - Recycled Water Irrigation Pump | 4 | SFPW | New permanent secondary service | $15k/yr. in lost gross revenue to SFPUC. $25k/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 16 | 730 Stanyan Street - Affordable Housing (Construction power) | 5 | MOHCD | New temporary secondary service | $148k in lost gross revenue to SFPUC for duration of temporary service. $28k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 17 | 240 Van Ness Avenue - Affordable Housing (Construction power) | 5 | MOHCD | New temporary secondary service | $87k in lost gross revenue to SFPUC for the duration of temporary service. $15k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 18 | 650 Divisadero Street - Affordable Housing (Construction power) | 5 | MOHCD | New temporary secondary service | $3.2M in lost gross revenue to SFPUC for the duration of temporary service. $1.2M. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 19 | 880 McAllister Street - Affordable Housing (Construction power) | 5 | MOHCD | New temporary secondary service | $284k in lost gross revenue to SFPUC for the duration of temporary service. $131k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 20 | 880 McAllister Street - Affordable Housing | 5 | MOHCD | New permanent secondary service | $1.86M/yr. in lost gross revenue to SFPUC. $599k/yr. in additional power costs to the project due to PG&E's higher rates. | Project added. |
| 21 | 420 Terry A. Francois Boulevard - Pump Controller | 6 | SFPUC | New permanent secondary service | $9k/yr. in lost gross revenue to SFPUC. $800/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 22 | 16th Street & Harrison - Stormwater Project | 6 | SFPUC | New permanent secondary service | $1k/yr. in lost gross revenue to SFPUC. $12/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |

## Attachment A2: Projects Released to Retail PG&E Service under WDT3 and WDT4

| | | | | | | |
|---|---|---|---|---|---|---|
| 23 | 202 Channel Street - Mission Bay Stormwater Pump Station | 6 | SFPUC | New permanent secondary service | $113k/yr. in lost gross revenue to SFPUC. $6k/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 24 | 600 7th Street - Affordable Housing (Construction power) | 6 | MOHCD | New temporary secondary service | $189k in lost gross revenue to SFPUC for the duration of temporary service. $20k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 25 | 233 Beale Street - New Park | 6 | SFRPD | New permanent secondary service | $12k/yr. in lost gross revenue to SFPUC. $19k/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 26 | 160 Freelon Street - Affordable Housing (Construction power) | 6 | MOHCD | New temporary secondary service | $716k in lost gross revenue to SFPUC for the duration of temporary service. $127k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 27 | 270 6th Street - Gene Friend (SOMA) Recreation Center (Temporary power) | 6 | SFRPD | New temporary secondary service | $187k in lost gross revenue to SFPUC for the duration of temporary service. $176k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 28 | 967 Mission Street - Affordable Housing (Construction power) | 6 | MOHCD | New temporary secondary service | $872k in lost gross revenue to SFPUC for the duration of temporary service. $317k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 29 | 1144 & 1200-1298 Third Street - Affordable Housing (Construction power) | 6 | MOHCD | New temporary secondary service | $1.49M in lost gross revenue to SFPUC for the duration of temporary service. $108k in additional power costs to the project due to PG&E's higher rates. | Project added. |
| 30 | 1144 & 1200-1298 Third Street - Affordable Housing | 6 | MOHCD | New temporary secondary service | $6.85M/yr. in lost gross revenue to SFPUC for the duration of temporary service. $2.2M/yr. in additional power costs to the project due to PG&E's higher rates. | Project added. |
| 31 | 499 John Muir Drive - Wastewater Pump | 7 | SFPUC | Upgrade to existing permanent Service | $5.4k/yr. in lost gross revenue to SFPUC. $6.5k/yr for the duration of temporary service. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 32 | Balboa Reservoir Park (Site A) - Affordable Housing | 7 | MOHCD | New permanent secondary service | $794k/yr. in lost gross revenue to SFPUC. $375k/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 33 | Balboa Reservoir Park (Site E) - Affordable Housing | 7 | MOHCD | New permanent secondary service | $573k/yr. in lost gross revenue to SFPUC. $273k/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 34 | 250 Laguna Honda Boulevard (Construction power) | 7 | MOHCD | New temporary secondary service | $1.6M in lost gross revenue to SFPUC for the duration of temporary service. $590k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 35 | 1939 Market Street - Affordable Housing Development (Construction power) | 8 | MOHCD | New temporary secondary service | $301k in lost gross revenue to SFPUC for the duration of temporary service. $48k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 36 | 2530 18th Street - Homeless Prenatal Program Family Housing (Construction power) | 9 | Homeless Prenatal Program/MOHCD | New temporary secondary service | $246k in lost gross revenue to SFPUC for the duration of temporary service. $93k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 37 | 1979 Mission Street - Tiny Homes Project | 9 | HSH | New temporary secondary service | $191k in lost gross revenue to SFPUC for the duration of temporary service. $246k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 38 | 300 Bartlett Street - Mission Branch Library renovation (Temporary power) | 9 | SFPL | New temporary secondary service | $72k in lost gross revenue to SFPUC for the duration of temporary service. $93k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 39 | 1515 South Van Ness Ave - Affordable Housing (Construction power) | 9 | MOHCD | New temporary secondary service | $224k in in lost gross revenue to SFPUC for the duration of temporary service. $69k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 40 | 2970 16th Street - Affordable Housing (Construction power) | 9 | MOHCD | New temporary secondary service | $3.4M in lost gross revenue to SFPUC for the duration of temporary service. $1.2M in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 41 | 1236 Carroll Avenue - Temporary Lights and Cameras (for future SFFD training facility) | 10 | SFFD | New temporary secondary service | $11k/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 42 | India Basin - 900 Innes (Construction power) | 10 | SFRPD | New temporary secondary service | Temp. construction power using generators - costs TBD.<br>Temp. power service from different source - estimated $18k in lost gross revenue to SFPUC. | No impacts update. |
| 43 | India Basin - Wi-fi Pop-Up | 10 | SFRPD | New temporary secondary service | Temp. power service used generators - costs TBD. Project energized under PG&E retail service - $15k in lost gross revenue to SFPUC. $24k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 44 | 1035 Gilman Avenue - Bret Harte Elementary (Temporary trailer) | 10 | SFUSD | New temporary secondary service | SF had initially applied to PG&E for temp. power service for the duration of temporary service. PG&E was unable to meet the project's schedule, so the project team redesigned and revised the plans so that the project could connect to the portables to the existing service. | No impacts update. |
| 45 | 500 Hunters Point - Temporary RV Parking for the Unhoused | 10 | SFHSH | New temporary secondary service | $2.8M in lost gross revenue to SFPUC for the duration of temporary service. $1M in additional power costs to the project due to PG&E's higher rates. | No impacts update. |

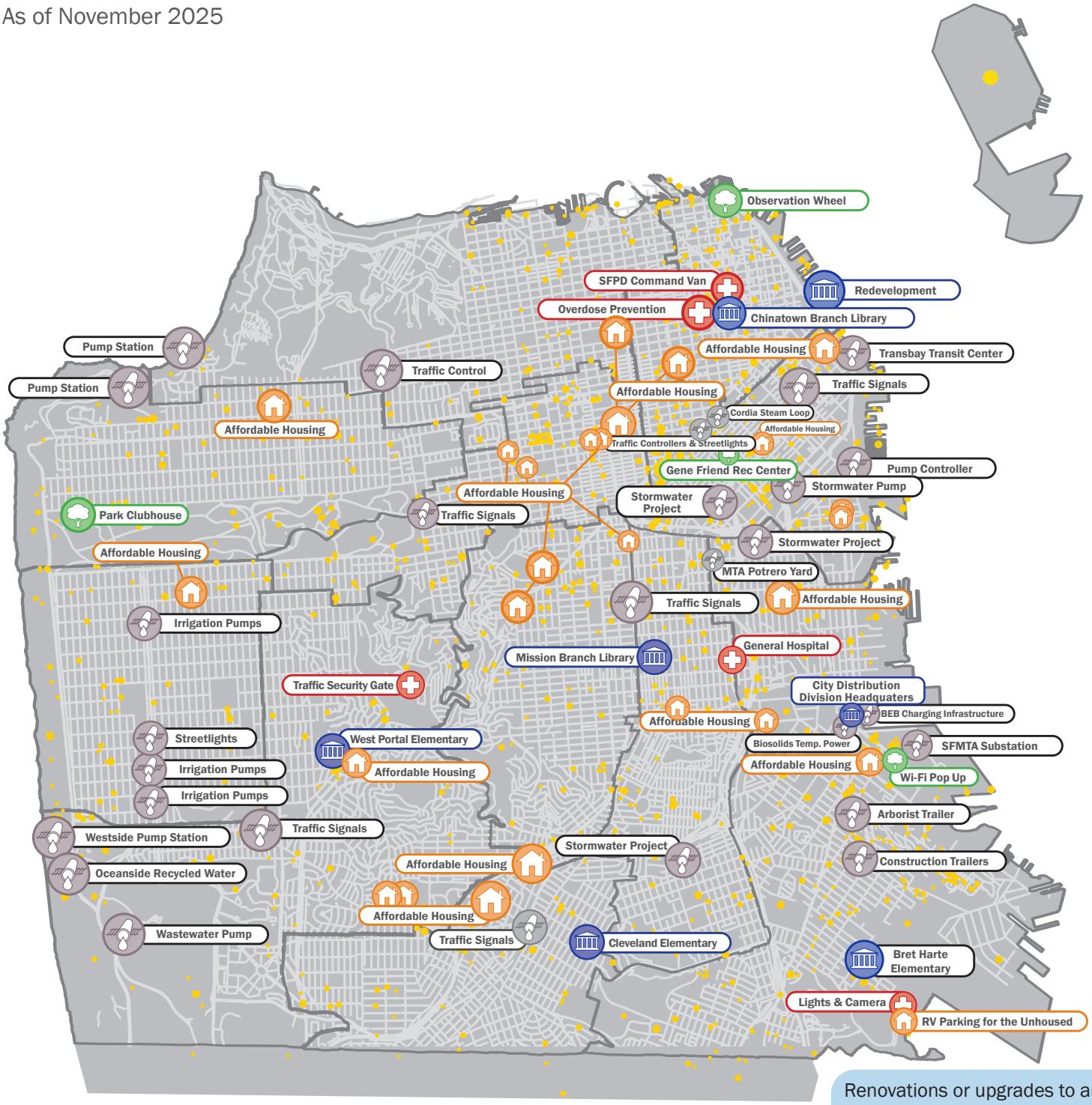
**Attachment A2: Projects Released to Retail PG&E Service under WDT3 and WDT4**

| | | | | | | |
|---|---|---|---|---|---|---|
| 46 | 2000 Marin Street - City Distribution Division Headquarters Application #1 (Construction Power) | 10 | SFPUC | New temporary secondary service | $2.4M in lost gross revenue to SFPUC for the duration of temporary service. $727k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 47 | 2000 Marin Street - City Distribution Division Headquarters Application #2 (Construction Power) | 10 | SFPUC | New temporary secondary service | $534k in lost gross revenue to SFPUC for the duration of temporary service. $161k in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 48 | 200 San Andreas Valley Road - Fiber Optic Amplifier | N/A | SFPUC | New permanent secondary service | $700/yr. in lost gross revenue to SFPUC. $25/yr. in additional power costs to the project due to PG&E's higher rates. | No impacts update. |
| 49 | Streetlights | N/A | SFPUC | New unmetered service | Cost impact TBD. New streetlights have had to apply to PG&E for retail service and will have to pay PG&E's higher rates. | No impacts update. |
| 50 | Traffic Controllers | N/A | SFMTA | New unmetered service | Cost impact TBD. New traffic controllers have had to apply to PG&E for retail service and will incur additional costs due to PG&E now requiring traffic controllers to have meters. | No impacts update. |

# **Attachment B** – Map Of Interconnection Issues

San Francisco Water Power Sewer
Services of the San Francisco Public Utilities Commission

As of November 2025




Renovations or upgrades to any of these service points could trigger service disputes and delays.

**Affordable Housing**

**Infrastructure**

**Health and Safety**

**Institution**

**Recreation**

**SFPUC Metered Service Point**

## Attachment C: Cost Impacts

| | | A | B | C | D | E | F | G | H | I | J |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Additional Costs to Project | | | | | | | | Other Impacts to SF |
| | | Project Location | Redesign Costs | Primary or Low-side Metering Equipment Costs | Additional Construction Costs | Additional Costs to Project for PG&E retail service* | Additional Const./Project Mgmt. Costs Due to Delay | Additional Staff Time Costs | Upgrades to PG&E's Distribution System | Total Additional Project Costs (B+C+D+E+F+G) | Lost gross revenue to SFPUC |
| Attachment A1 Projects | 1 | 499 Seacliff Avenue - Pump Station and Force Main | | | | | | | $ 18,000 | **$ 18,000** | |
| | 2 | 3455 Van Ness Avenue - AWSS Pump Station No. 2 | | $ 75,000 | | | | | $ 193,000 | **$ 268,000** | |
| | 3 | 850 Turk Street - Affordable Housing | | | | | | | $ 58,000 | **$ 58,000** | |
| | 4 | 1135 Powell Street- Chinatown Branch Library | | | | | | | | **$ -** | |
| | 5 | 19th Avenue - Traffic Signals | | | | | | | | **$ -** | |
| | 6 | L Taraval - Streetlights | | | | | | | | **$ -** | |
| | 7 | 2550 Irving Street - Mixed Use, Affordable Housing (90 units) | | | | | | | $ 2,000 | **$ 2,000** | |
| | 8 | Haight Street - Traffic Signals | | | | | | | | **$ -** | |
| | 9 | Folsom Streetscape - Traffic Signals and Safety Streetlighting | | | | | | | | **$ -** | |
| | 10 | Market Street & 7th Street - BMS Switch | | | | | | | | **$ -** | |
| | 11 | Transbay Transit Center - Transbay Joint Powers Authority** | | | $ 5,000,000 | | | | | **$ 5,000,000** | |
| | 12 | *** 77 Harriet Street (formerly 270 6th Street) - Gene Friend Rec Center | | | | | | | $ 340,000 | **$ 340,000** | |
| | 13 | 2098 Alameda Street - Stormwater Project | | | | | | | | **$ -** | |
| | 14 | 460 Jessie Street - Cordia Steam Loop | | | | | | | | **$ -** | |
| | 15 | 995 Market Street - New Streetlights and Traffic Controllers | | | | | | | | **$ -** | |
| | 16 | 3500 Great Highway - Oceanside Recycled Water | | | | | | | | **$ -** | |
| | 17 | Twin Peaks & Panorama Boulevard - Traffic Security Gate | | | | | | | | **$ -** | |
| | 18 | ***5 Lenox Way - West Portal Elementary School | | | | | | | | **$ -** | |
| | 19 | 16th Street Improvement - Traffic Signals | | | | | | | | **$ -** | |
| | 20 | 2500 Mariposa Street - Potrero Yard Modernization (Mixed-Use) | | | | | | | | **$ -** | |
| | 21 | ***300 Bartlett Street - Mission Branch Library | | $ 250,000 | | | | | $ 168,000 | **$ 418,000** | |
| | 22 | 1515 South Van Ness Avenue (Casa Adelante) - Mixed Use, Affordable Housing (168 units) | | | | $ | | | | | |
| | 23 | 529 Harmonia Street - Sunnydale HOPE | | | | | | | $ 5,300,000 | **$ 5,300,000** | |
| | 24 | 1108 Connecticut Street - HOPE Potrero | | | | | | | $ 5,500,000 | **$ 5,500,000** | |
| | 25 | 702 Phelps Street - SFMTA Substation | | | | | | | | **$ -** | |
| | 26 | 1920 Evans - Arborist Trailer/BUF Yard | | | | | | | $ 54,000 | **$ 54,000** | |
| | 27 | 1301 Cesar Chavez -Islais Creek - BEB Charging Infrastructure | | | | | | | $ 300,000 | **$ 300,000** | |
| | 28 | 1001 Potrero - General Hospital (2403 23rd St) | | | | | | | | | |
| | 29 | 455 Athens Street - Cleveland Elementary School | | $ 345,000 | $ 240,000 | | | | | **$ 585,000** | |
| | 30 | 2340 San Jose Avenue - Affordable Housing (138 units) | | | | $ 35,000 | | | $ 715,000 | **$ 750,000** | $ 191,000 |
| | 31 | Contract 65 - Traffic Signals (Various locations) | | | | | | | | **$ -** | |
| | 32 | 1900 El Camino Real - Water Testing Equipment | | | | | | | | **$ -** | |
| | 33 | Multiple Service Transfers | | | | | | | | **$ -** | |
| | 34 | 951 Antoinette Lane - Well Pump & Control Panel | | | | | | | $ 173,000 | **$ 173,000** | |
| | 35 | 1000 El Camino Real - Plumbing Shop Building | | | | | | | | **$ -** | |
| | 1 | 499 Seacliff Avenue - Pump Station and Force Main (Construction power) | | | | $ 5,000 | | | | **$ 5,000** | $ 19,000 |

## Attachment C: Cost Impacts

| | | | Additional Costs to Project | | | | | | | | Other Impacts to SF |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Project Location | Redesign Costs | Primary or Low-side Metering Equipment Costs | Additional Construction Costs | Additional Costs to Project for PG&E retail service* | Additional Const./Project Mgmt. Costs Due to Delay | Additional Staff Time Costs | Upgrades to PG&E's Distribution System | Total Additional Project Costs (B+C+D+E+F+G) | Lost gross revenue to SFPUC |
| Attachment A2 Projects | 2 | 100 Sea Cliff Avenue - Pump Station | | | | $ 27,000 | | | | **$ 27,000** | $ 147,000 |
| | 3 | 970 47th Avenue - Golden Gate Park Clubhouse (Temporary trailer) | | | | $ 33,000 | | | | **$ 33,000** | $ 21,000 |
| | 4 | 4200 Geary Boulevard - Affordable Housing (Construction power) | | | | $ 8,000 | | | | **$ 8,000** | $ 45,000 |
| | 5 | 850 Turk Street - Affordable Housing (Construction power) | | | | $ 166,700 | | | | **$ 166,700** | $ 944,000 |
| | 6 | 750 Golden Gate Ave - Affordable Housing (Construction power) | | | | $ 512,806 | | | | **$ 512,806** | $ 1,409,439 |
| | 7 | 750 Golden Gate Ave - Affordable Housing | | | | $ 403,606 | | | | **$ 403,606** | $ 1,109,305 |
| | 8 | 346 Post Street - SFPD Command Van | | | | $ 4,000 | | | | **$ 4,000** | $ 2,000 |
| | 9 | 822 Geary Street - Overdose Prevention and Crisis Stabilization | | | | $ 81,000 | | | | **$ 81,000** | $ 78,000 |
| | 10 | Seawall Lots 323 & 324 - Hotel & Theater (Construction power) | | | | $ 4,000 | | | | **$ 4,000** | $ 132,000 |
| | 11 | 2001 Embarcadero Street -Port SkyStar Observation Wheel (Temporary power) | | | | $ 228,000 | | | | **$ 228,000** | $ 737,000 |
| | 12 | 2550 Irving Street - Affordable Housing (Construction power) | | | | $ 30,000 | | | | **$ 30,000** | $ 256,000 |
| | 13 | Sunset Boulevard & Lawton Street - Recycled Water Irrigation Pump | | | | $ 25,000 | | | | **$ 25,000** | $ 15,000 |
| | 14 | Sunset Boulevard & Taraval Street - Recycled Water Irrigation Pump | | | | $ 25,000 | | | | **$ 25,000** | $ 15,000 |
| | 15 | Sunset Boulevard & Yorba Street - Recycled Water Irrigation Pump | | | | $ 25,000 | | | | **$ 25,000** | $ 15,000 |
| | 16 | 730 Stanyan Street - Affordable Housing (Construction power) | | | | $ 28,000 | | | | **$ 28,000** | $ 148,000 |
| | 17 | 240 Van Ness Avenue - Affordable Housing (Construction power) | | | | $ 15,000 | | | | **$ 15,000** | $ 87,000 |
| | 18 | 650 Divisadero Street - Affordable Housing (Construction power) | | | | $ 1,161,000 | | | | **$ 1,161,000** | $ 3,216,000 |
| | 19 | 880 McAllister Street - Affordable Housing (Construction power) | | | | $ 131,000 | | | | **$ 131,000** | $ 284,000 |
| | 20 | 880 McAllister Street - Affordable Housing | | | | $ 599,000 | | | | **$ 599,000** | |
| | 21 | 420 Terry A. Francois Boulevard - Pump Controller | | | | $ 800 | | | | **$ 800** | $ 9,000 |
| | 22 | 16th Street & Harrison - Stormwater Project | | | | $ 12 | | | | **$ 12** | $ 1,000 |
| | 23 | 202 Channel Street - Mission Bay Stormwater Pump Station | | | | $ 6,000 | | | | **$ 6,000** | $ 113,000 |
| | 24 | 600 7th Street - Affordable Housing (Construction power) | | | | $ 28,000 | | | | **$ 28,000** | $ 189,000 |
| | 25 | 233 Beale Street - New Park | | | | $ 19,000 | | | | **$ 19,000** | $ 12,000 |
| | 26 | 160 Freelon Street - Affordable Housing (Construction power) | | | | $ 127,000 | | | | **$ 127,000** | $ 716,000 |
| | 27 | 270 6th Street - Gene Friend (SOMA) Recreation Center (Temporary power) | | | | $ 176,000 | | | | **$ 176,000** | $ 187,000 |
| | 28 | 1144 & 1200-1298 Third Street - Affordable Housing (Construction power) | | | | $ 108,000 | | | | **$ 108,000** | |
| | 29 | 1144 & 1200-1298 Third Street - Affordable Housing | | | | $ 2,200,000 | | | | **$ 2,200,000** | |
| | 30 | 967 Mission Street - Affordable Housing (Construction power) | | | | $ 317,151 | | | | **$ 317,151** | $ 871,684.13 |
| | 31 | 499 John Muir Drive - Wastewater Pump | | | | $ 6,500 | | | | **$ 6,500** | $ 5,400 |
| | 32 | Balboa Reservoir Park (Site A) - Affordable Housing | | | | $ 375,000 | | | | **$ 375,000** | $ 794,000 |
| | 33 | Balboa Reservoir Park (Site E) - Affordable Housing | | | | $ 273,000 | | | | **$ 273,000** | $ 573,000 |

## Attachment C: Cost Impacts

| | | Additional Costs to Project | | | | | | | | Other Impacts to SF |
|---|---|---|---|---|---|---|---|---|---|---|
| | Project Location | Redesign Costs | Primary or Low-side Metering Equipment Costs | Additional Construction Costs | Additional Costs to Project for PG&E retail service* | Additional Const./Project Mgmt. Costs Due to Delay | Additional Staff Time Costs | Upgrades to PG&E's Distribution System | Total Additional Project Costs (B+C+D+E+F+G) | Lost gross revenue to SFPUC |
| 34 | 250 Laguna Honda Boulevard - Affordable Housing (Construction power) | | | | $ 590,000 | | | | **$ 590,000** | $ 1,635,000 |
| 35 | 1939 Market Street - Affordable Housing Development (Temporary power) | | | | $ 48,000 | | | | **$ 48,000** | $ 301,000 |
| 36 | 2530 18th Street - Homeless Prenatal Program Family Housing (Construction power) | | | | $ 93,000 | | | | **$ 93,000** | $ 246,000 |
| 37 | 1979 Mission Street - Tiny Homes Project | | | | $ 246,000 | | | | **$ 246,000** | $ 191,000 |
| 38 | 300 Bartlett Street - Mission Branch Library renovation (Temporary power) | | | | $ 93,000 | | | | **$ 93,000** | $ 72,000 |
| 39 | 1515 South Van Ness Avenue - Affordable Housing Development | | | | $ 69,000 | | | | **$ 69,000** | $ 224,000 |
| 40 | 2970 16th Street - Affordable Housing (Construction power) | | | | $ 1,244,000 | | | | **$ 1,244,000** | $ 3,445,600 |
| 41 | 1236 Carroll Avenue - Temporary Lights and Cameras (for future SFFD | | | | $ 11,000 | | | | **$ 11,000** | $ 8,000 |
| 42 | India Basin - 900 Innes (Construction power) | | | | | | | | **$ -** | $ 18,000 |
| 43 | India Basin - Wi-fi Pop-Up | | | | $ 24,000 | | | | **$ 24,000** | $ 15,000 |
| 44 | 1035 Gilman Avenue - Bret Harte Elementary (Temporary trailer) | | | | | | | | **$ -** | |
| 45 | 500 Hunters Point - Temporary RV Parking for the Unhoused | | | | | | | | **$ -** | |
| 46 | 2000 Marin Street - CDD Headquarters Application #1 (Construction Power) | | | | $ 727,176 | | | | **$ 727,176** | $ 2,434,287 |
| 47 | 2000 Marin Street - CDD Headquarters Application #2 (Construction Power) | | | | $ 161,437 | | | | **$ 161,437** | $ 534,152 |
| 48 | 200 San Andreas Valley Road - Fiber Optic Amplifier | | | | $ 25 | | | | **$ 25** | $ 700 |
| 49 | Streetlights | | | | | | | | **$ -** | |
| 50 | Traffic Controllers | | | | | | | | **$ -** | |
| | **TOTAL** | **$ -** | **$ 670,000** | **$ 5,240,000** | **$ 10,490,214** | **$ -** | **$ -** | **$ 12,821,000** | **$ 29,221,214** | **$ 21,466,567** |
| | | | | | | | | **Total Additional Project Costs** | | **$ 29,221,214** |
| | | | | | | | | **Total Lost Gross Revenue to SFPUC** | | **$ 21,466,567** |
| | | | | | | | | **Total Cost Impact to SF (Project Costs + Lost Revenue)** | | **$ 50,687,781** |

**Note:** These represent estimates of the costs that the City is aware of at the moment. The projects may incur additional costs going forward.

The projects in RED are projects that are currently at a standstill and may face financial impacts that are TBD depending on how long they will be delayed and how they will move forward.

*When calculating "Additional Costs to Project for PG&E retail service", the estimated value is either an annual estimate or for the length of the project (for temporary projects).

**The costs for #11 Transbay Transit Center are still being verified. See Attachment A for more details.

*** These projects are moving forward under the Voltage Settlement.

Bos - 11

San Francisco
Ethics Commission

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San Francisco, CA 94102-6053
ethics.commission@sfgov.org
415-252-3100 | sfethics.org

# Notice of Proposed Regulation Amendments Regarding the Required Timeline for Considering Post-Employment and Compensated Advocacy Waivers

December 1, 2025

At its regular meeting on Friday, December 12, 2025, the San Francisco Ethics Commission will consider and possibly act on proposed regulation amendments (attached) that would adjust the amount of time the Commission has to consider post-employment waivers and compensated advocacy waivers.

The Ethics Commission administers post-employment restrictions under Section 3.234 of the Campaign & Governmental Conduct Code and its supporting regulations. The Ethics Commission also administers a prohibition on compensated advocacy under Section 3.224 and its supporting regulations. In certain circumstances, the Commission may waive these restrictions if a former or current officer or employee requests such a waiver under the Code. Currently, if these waiver requests are submitted at least two weeks before the next scheduled Commission meeting, the waiver must then be considered at the next Commission meeting. The Ethics Commission meets monthly.

Given the state-mandated timelines associated with the posting of meeting materials, the current waiver consideration timeline can effectively give staff approximately a week to review requests and prepare recommendations. This limits staff's ability to gather facts, analyze the request, work with the requestor, and prepare a recommendation for the Commission. The proposed amendments would extend the waiver consideration deadlines, so that waiver requests must be reviewed at one of the Commission's next two regularly scheduled meetings. This change would ensure Commission staff have at least three weeks to prepare recommendations before meeting materials are posted, while ensuring requests are heard within no more than two months of being submitted.

This 10-day notice is provided under Charter Sec. 4.104 to encourage public comment on the proposals in advance of the Commission's next meeting.

The Commission invites all input on the proposed regulation amendments. Written comments can be sent via email to ethics.commission@sfgov.org. Written public comment received by 4:30 p.m. on Thursday, December 11, 2025, will be included in the Commission's packet of meeting materials for its December 12, 2025 meeting. Opportunity for public comment will also be provided during the Commission's meeting.

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2025 DEC 01 PM02:42

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# ETHICS COMMISSION REGULATION AMENDMENTS EXTENDING WAIVER CONSIDERATION TIMELINES

Approved by Ethics Commission: **TBD**

## Draft Regulation Amendments Regarding San Francisco Campaign & Governmental Conduct Code Sections 3.224 and 3.234

### Regulation 3.224-2. Compensated Advocacy – Waivers for Members of Boards and Commissions Who by Law must be Appointed to Represent Certain Professions, Trades, Businesses, Unions or Associations

(a) Waivers. The Ethics Commission may waive the prohibition in section 3.224(a) for any member of a board or commission who by law must be appointed to represent a profession, trade, business, union or association. Such waivers may be granted upon the request of the member; the request of the member's appointing authority; or on the Commission's own initiative.

(b) Process for Granting Waivers. All waivers granted pursuant to subsection 3.224(c) must be made at a public meeting. Requests for waivers made by a City officer or by the officer's appointing authority must be in writing and state the reasons why the waiver should be granted. The Ethics Commission shall consider, at either of its next two regularly scheduled meetings, any waiver request that meets the criteria of this regulation ~~provided that such request is received at least two calendar weeks in advance of the meeting~~. In making a determination to grant a waiver under this subsection the Commission may consider: the ability of the City to recruit qualified individuals to fill the position in question if the waiver is not granted; the ability of the member to engage in their~~his or her~~ particular vocation if the waiver is not granted; and any other factors the Commission deems relevant.

(c) Notice. The Commission shall maintain a list of waivers granted under subsection 3.224(c) and post the list on the Commission's web page.

### Regulation 3.234-4. Waivers

(a) Requests for Waivers from Post-Employment Restrictions.

(1) Requests for waivers from permanent and one-year bans. Any current or former City officer or employee may submit a request to the Commission for a waiver from the permanent bans on working or advising on particular matters imposed by subsection 3.234(a)(1) or the one-year ban on communicating with former colleagues imposed

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by subsections 3.234(a)(2). Such requests must be in writing and include information describing the former position held by the officer or employee; the particular matter for which the waiver is sought; the individual's prior involvement in the matter, if any; and reasons why granting a waiver would not create the potential for undue influence or unfair advantage. The individual must also certify that they have~~he or she has~~ provided a copy of the waiver request to the City officer or employee responsible for the day-to-day management of their~~his or her~~ former department, board, commission, office, or unit of government.

(2) Requests for waivers of ban on compensation from City contractors. Any current or former City officer or employee may submit a request to the Commission for a waiver from the ban on receiving compensation from certain City contractors imposed by subsection 3.234(a)(3). Such a request must be in writing and include information describing the name and business activity of the potential new employer of the officer or employee; the contracts that the officer or employee personally and substantially participated in awarding to their~~his or her~~ potential new employer during the 12 months prior to the officer's or employee's acceptance of employment or receipt of or entitlement to compensation; the exact nature of the officer or employee's participation in awarding those contracts; and reasons why imposing the restriction in subsection 3.234(a)(3) would cause extreme hardship for the City officer or employee. The City officer or employee must also certify that they have~~he or she has~~ provided a copy of the waiver request to the City officer or employee responsible for the day-to-day management of the department, board, commission, office, or unit of government for which the officer or employee served at the time they~~he or she~~ participated in awarding the contract.

(3) Consideration of waiver requests. The Ethics Commission shall consider, at either of its next two regularly scheduled meetings, any request that meets the criteria set forth in subsections (a)(1) or (a)(2) of this Regulation~~, provided that such request is received at least two calendar weeks in advance of the meeting. The Commission shall not consider at its next meeting any waiver request that does not comply with this deadline.~~ The individual who has requested the waiver, or their~~his or her~~ representative, and a designated representative from the department, board, commission, office or unit of government of the individual, may make a presentation to the Commission supporting or opposing the waiver request. The Commission may

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set reasonable time limits on such presentations in accordance with the Sunshine Ordinance and the Brown Act.

(4) Approval of waiver requests from permanent and one-year bans. The Commission shall not approve any request for a waiver from the permanent or one-year bans made under subsection 3.234(c)(1) unless the Commission makes a finding that granting such a waiver would not create the potential for undue influence or unfair advantage. In making this determination, the Commission may consider: the nature and scope of the communications the individual will have with their~~his or her~~ former department, board, commission, office, or unit of government; the subject matter of such communications; the former position held by the officer or employee; the type of inside knowledge that the individual may possess; and any other factors the Commission deems relevant.

(5) Approval of waiver requests from ban on compensation from City contractors. The Commission shall not approve any request for a waiver from the ban on receiving compensation from certain City contractors made under subsection 3.234(c)(3) unless the Commission makes a finding that imposing the restriction in subsection 3.234(a)(3) would cause extreme hardship for the individual. In making this determination, the Commission may consider: the vocation of the individual; the range of employers for whom the individual could work; the steps the individual has taken to find new employment; and any other factors the Commission deems relevant.

(b) Waivers for Former Members of Boards and Commissions Who by Law must be Appointed to Represent Certain Professions, Trades, Businesses, Unions or Associations.

(1) Waivers from the permanent and one-year bans. The Ethics Commission may waive the permanent bans on working or advising on particular matters and the one-year ban on communicating with former colleagues imposed by subsections 3.234(a)(1) and 3.234(a)(2) for any member of a board or commission who by law must be appointed to represent a profession, trade, business, union or association. Such waivers may be granted upon the Commission's own initiative; at the request of the appointing authority of a member of a board or commission who by law must be appointed to represent a profession, trade, business, union or association; or at the request of an individual who was appointed or is being considered for appointment to a board or commission to represent a profession, trade, business, union or association.

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(2) Process for Granting Waivers. All waivers granted pursuant to subsection 3.234(c)(2) must be made at a public meeting. Requests for waivers made by an appointing authority or a member of a board or commission must be in writing and state the reasons why the waiver should be granted. The Ethics Commission shall consider, at either of its next two regularly scheduled meetings, any waiver request that meets the criteria of this regulation ~~provided that such request is received at least two calendar weeks in advance of the meeting~~. In making a determination to grant a waiver under this subsection the Commission may consider: the ability of the City to recruit qualified individuals to fill the position in question if the restrictions are not waived; the ability of the commissioner or board member to engage in their~~his or her~~ particular vocation if the restrictions are not waived; and any other factors the Commission deems relevant.

(c) Notice. The Commission shall maintain a list of waivers granted under subsection 3.234(c) and post the list on the Commission's web page.

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | Certification of Votes Cast in San Francisco for Nov 4, 2025, Statewide Special Election |
| **Date:** | Thursday, December 4, 2025 11:36:42 AM |
| **Attachments:** | Memo - Clerk of the Board - Nov 2025.pdf<br>Certification Packet - Statewide Special Election - Nov 4 2025 - FINAL.pdf |

Hello,

Please see attached and below communication from the Department of Elections (REG), submitting
certification of the results of votes cast in San Francsico for the November 4, 2025, Statewide Special Election.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF ELECTIONS
John Arntz, Director

# Memorandum

To: Angela Calvillo, Clerk of the Board of Supervisors

From: John Arntz, Director of Elections

Date: December 3, 2025

RE: Certification Documents: November 4, 2025, Statewide Special Election

This memorandum provides documents associated with the certification of the results of votes cast in San Francsico for the November 4, 2025, Statewide Special Election for inclusion in the "Petitions and Communications" section of the next agenda for the Board of Supervisors.

The Board of Supervisors is not required to declare the results of this election since the ballot did not include local contests or measures. All necessary documents associated with the votes cast in San Francisco in this statewide election have been provided to the California Secretary of State's Office.

Please let me know if there are any questions or if I can provide any other information.

Thank you.

Encl: Certification Letter for November 4, 2025, Statewide Special Election
Attachment 1, Statement of the Results
Attachment 2, SHA512 List of Hashed Records
Attachment 3, Manual Tally Report

CITY AND COUNTY OF SAN FRANCISCO
**DEPARTMENT OF ELECTIONS** John Arntz, Director

Honorable Members
Board of Supervisors
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, California 94102

**Statement of the Results**
**City and County of San Francisco**
**Statewide Special Election – November 4, 2025**

I, John Arntz, Director of Elections, certify that I have canvassed the ballots cast in the Statewide Special Election held on Tuesday, November 4, 2025, in the City and County of San Francisco (City), in the manner required by Division 15 of the California Elections Code.

I certify that I began the canvass immediately upon the close of the polls and, with the tabulation of all votes recorded, present a complete record entitled "Statement of the Results of the Statewide Special Election – November 4, 2025." I also certify that 295,232 voters cast ballots; therefore, 55.57% of San Francisco's 531,310 voters participated in this election.

In accordance with California Elections Code section 15374, I certify that this Statement of the Results provides the total number of votes cast in San Francisco for and against the statewide ballot measure. The precinct detail of all votes cast appears in the Statement of the Vote, which is posted on the Department of Elections' website at *sfelections.gov/results* and is incorporated by reference into this Statement of the Results.

This Statement of the Results includes a table in Attachment 1 that lists the total votes cast in San Francisco for and against the statewide ballot measure, and is organized as follows:

1. **State Proposition 50**
   "Authorizes Changes to Congressional District Maps in Response to Texas' Partisan Redistricting. Legislative Constitutional Amendment."

For the November 4, 2025, Statewide Special Election, all voters received a one-card ballot.

All ballots included the following measure:

**Card 1:** State Proposition 50.

### SHA-512 Cryptographic Hash Algorithm

The Department of Elections applied a SHA-512 cryptographic function to reports associated with this election to establish the integrity of the results in a verifiable manner. Attachment 2 provides information regarding the SHA-512 hash values for all electronic files associated with the final, certified results reports.

### Voting System and Election Transparency

The City's voting system allows for increased election transparency through the posting of images of voted ballots, equipment logs, and other election reports, all of which have been posted with the final election results on the Department's website, *sfelections.gov*.

### Voted ballot images

The City's voting system captures images of each voted ballot cast in an election. This creates a visual history of how ballots were marked. After each election, the Department posts the ballot images on its website, allowing members of the public to view each voted ballot cast in the City. Prior to posting the ballot images, the Department reviews the images and redacts identifying information that voters may have placed on ballot cards.

### AuditMark

In addition to the voting system capturing images of voted ballot cards, the system also adds an explanation at the bottom of each ballot image indicating how the voting equipment interpreted and tallied each vote mark. These explanations, or AuditMarks, provide the public with information on how the voting system operates in relation to the recording and reporting of every vote cast in this election. This means that for every oval with a mark inside the voting target, even for partial marks, the voting system adds an explanation to the images of voted ballots of how the system understood and registered the markings within each oval.

### Cast Vote Record

The Department posted a "Cast Vote Record" that lists each vote recorded on each ballot card. The data provided in the Cast Vote Record is captured as the ballots are scanned by the voting equipment and before vote tabulation occurs, allowing members of the public to tabulate votes from specific precincts, districts, etc., and to compare with the official election results.

**Attachments**
Attachment 1 provides a table that lists the votes cast in San Francisco for or against the statewide ballot measure.

Attachment 2 is the list of SHA-512 hashes associated with each final election results report.

Attachment 3 is the report from the manual tallies that the Department conducted on randomly selected polling place, vote-by-mail, and provisional ballots to confirm the voting equipment operated properly, and accurately counted and reported election results.

In witness whereof, I hereby affix my hand and seal this 3rd day of December 2025.

John Arntz, Director of Elections

## 1. STATE PROPOSITION

I certify the results for the following STATE PROPOSITION:
(Results represent votes cast in San Francisco only)

**PROPOSITION 50**

**"AUTHORIZES TEMPORARY CHANGES TO CONGRESSIONAL DISTRICT MAPS IN RESPONSE TO TEXAS' PARTISAN REDISTRICTING. LEGISLATIVE CONSTITUTIONAL AMENDMENT."**

| | Ballots Counted | Percentage |
|---|---|---|
| **YES** | **251,058** | **85.29%** |
| NO | 43,288 | 14.71% |
| **Total** | 294,346 | |
| Under Votes | 848 | |
| Over Votes | 38 | |
| | 295,232 | |

**List of SHA-512 Hash Values for Certified Results Reports**
**Statewide Special Election, November 4, 2025**

This list represents the various certified results reports the Department of Elections issued for the November 4, 2025, Statewide Special Election. The file names for each report are listed numerically, and underneath each file name is the SHA-512 cryptographic hash value applicable to each file. All reports are posted on the Department's website: www.sfelections.gov/results

1. "**Summary – PDF**," lists a summary of votes cast by contest, using a PDF format.

   **Hash value:**
   13B647B102B5519F6826FBE98B173F110B92851F9258440D866FD52DA3848B8F36C9A2C6D11E
   C12422A9DA9E6ACC8755D84D12B3B94B27F4B763C2542DACBC63

2. "**Summary – Excel**," lists a summary of votes cast by contest, using Microsoft Excel.

   **Hash value:**
   D9D1E9F3F28A312E2291A234428E246511716BB30EB4E4A1AFE21E8A39774481011850C2377BD
   A4D92577496D0ADB4135284D6B80763FDB7475265B6E556CF2A

3. "**Summary – XML**," lists a summary of votes cast by contest, using XML format.

   **Hash value:**
   A0541291EC69F30560DC696B18DC3D0E65019391741C930C01770A90CFC34E95A85F369897AA
   B09BE604CD2EEFA538C5832313508EB4E7ADA0D0FE685EF61E42

4. "**SOV – PDF**," lists votes cast in each precinct and for each contest, using a PDF format.

   **Hash value:**
   211B36371EED6C6BC2BD715C6785666B66E50AA500982732D04EAFC6E93D8462F2ECFA95F779
   CCAEEF1D889F3EDAA44692E5AC144CD2F8FD9E2A0989260FAA4F

5. "**SOV – Excel**," lists votes cast in each precinct and for each contest, using Microsoft Excel.

   **Hash value:**
   D85F732E9BDA162CE33F771B2A0607A14C1C40D734293BDA9A82D9F7465B789F2509F8E14065
   5DEA502D526D4E7B6A1BDF8ECD2B6A2AA6962A6C6E22CCB512C0

6. "**District SOV – PDF**," lists votes cast in each district and for each contest, using a PDF format.

   **Hash value:**
   784EFCCBA08363CB57C74672D62314D74CCC5456155337840C0BCBBC5553D7CA0C435E5258
   062AC84F6DEAF3A7AF43459619FF1E845B9F97FB284E0EC185A13F

7. "**District SOV – Excel**," lists votes cast in each district and for each contest, using Microsoft Excel.

**List of SHA-512 Hash Values for Certified Results Reports**
**Statewide Special Election, November 4, 2025**

**Hash value:**
712F8F2A0CFF0A6B5633D5E256AB87C5FFD06397A6449AF432B568B68D9442B556D784A51B1D
A52FAA849322F80E8CCD52E77D2F2301F8AD77C4219600C2A3FC

8. **"Cast Vote Record – JSON,"** lists votes cast on each ballot card in a zipped JSON format.

**Hash value:**
159FB24C2CE063331ABF7B5B1E6019724B1EE269F02AE6151C66C885C6973D43C8B893B85115
5AF08BA8B3FDD18E4205C1BA1581515AA7DDD7BA2EDA42CEE460

9. **"District 1 Ballot Images – ZIP"**, contains scanned ballot images in zipped TIFF format.

**Hash value:**
A1E9D2E018985F41C5EA106339778A09BF63A66B01FB39FD36FD433FCD8CDEBE882821584641
B05F364640EB062B2F42BC39ECA839E1A9E7B43E4D211B2FEC69

10. **"District 2 Ballot Images – ZIP"**, contains scanned ballot images in zipped TIFF format.

**Hash value:**
57DCF2620099916575B46FDE935F07FBAE5108E4B8C187D736C6E3F28E84BD81D86F4A96670B
4E067784E17CC69BD9D34B17E510092FFA95400E0B631EF9F75A

11. **"District 3 Ballot Images – ZIP"**, contains scanned ballot images in zipped TIFF format.

**Hash value:**
973A5913E273DB6BC2C91EDBFD57D509AED13E01FA994883F7AC9A9F933605DA9F4C20D0C5B
1DA4806DE69A22B965E909C5F46E94363D7E71E67988B8B7A4170

12. **"District 4 Ballot Images – ZIP"**, contains scanned ballot images in zipped TIFF format.

**Hash value:**
F2856F24001B367C0D6022B6B0EC9E2CAF67DF80AD04091E55999282D6B9D826756EFFB25BDC
F5CCDEFF97E06692DA548667DFA9440FEB49EDD626D1CD541EB0

13. **"District 5 Ballot Images – ZIP"**, contains scanned ballot images in zipped TIFF format.

**Hash value:**
FDED9C0EC5786FF858227B35A9194BF9AC0A716DEEE3A05029B540CBA2EF4386943C60EA7335
999D4771944B9C4DEE218151499EB65530C335D144B5ECF382A1

14. **"District 6 Ballot Images – ZIP"**, contains scanned ballot images in zipped TIFF format.

**Hash value:**
B23E5473DE06C1CA75A84D36F41A3D6FC833DF6DF26505621DB85E6E7644FE5CE73DFC2AE3A0
EFC1822A223F63484885B2429D04EFA8F2281CADFC274E77A94F

**List of SHA-512 Hash Values for Certified Results Reports**
**Statewide Special Election, November 4, 2025**

15. "**District 7 Ballot Images – ZIP**", contains scanned ballot images in zipped TIFF format.

    **Hash value:**
    D303F2CD9D83CA8103E6D2C87F9AA42A79622F0FFB8D6135E76EE69397FB44688FFCF0F1B9FD
    9A06CAACA8026A8F858974F6741E61D27CD57BC1E278091EBDF1

16. "**District 8 Ballot Images – ZIP**", contains scanned ballot images in zipped TIFF format.

    **Hash value:**
    A9F56938807806961D97EDC48909589AD2326F5F78A7D488C3F032FCDE50AC08D488339E9D7F
    973C0B2CC1E16A25E7A2FF786CF634A170FD91513174462B426D

17. "**District 9 Ballot Images – ZIP**", contains scanned ballot images in zipped TIFF format.

    **Hash value:**
    3AB6B86C421455D76ADCA13D33E3147054CF7A668799BF67CD973B54D88C4BEF9C79D22C655
    0884EC4BF43353F5C06DBA88ED8E2E4C4E4FDB40CB0BFE5F633CE

18. "**District 10 Ballot Images – ZIP**", contains scanned ballot images in zipped TIFF format.

    **Hash value:**
    804923251C0ED7297ED1611A614DC7474703930FD3E6E63B912A5456BBE095E068FE96EDE180F
    10EAE51E35677B4C9C16F3EB2A35994EB4990984B2221BAC478

19. "**District 11 Ballot Images – ZIP**", contains scanned ballot images in zipped TIFF format.

    **Hash value:**
    A71AA3CFD8DDA2B76172322B54F1BE81535154D2CFFD290A0826444544811C1EB5503DB2EBD5
    0E40883564269E21550B6D081AB8AFD316A28D8A8BCCC34BE879

20. "**Ballot Scanning Machine Logs – ZIP**," audit logs from Ballot Scanning Machines used at Polling Places on Election Day.

    **Hash value:**
    C0DAD5588EC644DF20A789996CD2043A47444B690D55CF3DA3DCDDA691ECDA30E436673EA8
    CDA26DF4547CDA0C791CE93D279C17931B371680FDA0CEEBF2F0DE

21. "**Vote-by-Mail Status Report**," lists the disposition of the vote-by-mail ballots the Department received.

    **Hash value:**
    EB886416CFDBF516E56719533D8CB8CB75CC6075E843E7CF55E669E226EA37CC40098F6B5B19
    DDDAEE7956B71364BA3288E72475A7336BFCBCBEC0E688532936

**List of SHA-512 Hash Values for Certified Results Reports**
**Statewide Special Election, November 4, 2025**

22. "**Provisional Ballot Status Report**," lists the disposition of the provisional ballots the Department received.

    **Hash value:**
    B83988AFF946989158DFC0A7E311AE85717AC44CABD1949126E1D2D5F187E07846EACEB1212F
    1DF8E2A22DD4E3539444CCD93698EC32A4791577F73620FF4B62

23. "**Conditional Voter Registration Report**," lists the disposition of the ballots cast during the Conditional Voter Registration period.

    **Hash value:**
    24BAEFD0632EF26A62F55A2437891A29F76EB26E6CD19FE66EB7ABE39121624D7D22BE6A58314
    C856556178119C7A156AA9666F6F66A580186E344B1C45C6D1F

CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF ELECTIONS
John Arntz, Director

December 3, 2025

**November 4, 2025, Statewide Special Election**
**Results of the 1% Post-Election Manual Tally**

Pursuant to state elections law, the San Francisco Department of Elections (Department) is required to conduct a manual tally of all ballots cast in 1% of San Francisco's polling places and 1% of the vote-by-mail ballots cast and may also manually tally 1% of provisional ballots cast, as part of the Official Canvass of the election. The Department compares the results of the manual tally to the results reports generated by the voting equipment used to tabulate ballot cards. The purpose of the manual tally is to verify the accuracy of the voting equipment used in the election. Upon completion of the 1% manual tally, the Department prepares a report on the results of the manual tally and includes the report in the certification of the Official Canvass for the election.

The following is a report on the results of the manual tally of 1% of the polling place, vote-by-mail, and provisional ballots cast in the November 4, 2025, Statewide Special Election.

## Random Selection of Precincts

On November 19, 2025, the Department conducted a random selection of precincts and batches for the manual tally in accordance with California Elections Code section 15360.

On Friday, November 14, 2025, the Department issued a press release announcing that the random selection would occur on November 19 at 9:00 a.m. The notice was posted on the Department's website, sfelections.gov, and outside the Department's office in City Hall, Room 48. The press release also informed the public that the selection process would be open to in-person observation and available via livestream and recording at sfelections.gov/observe.

During the selection, the Department used ten-sided dice to randomly select 1% of San Francisco's 100 polling place precincts, resulting in the selection of Precinct 9216 as well as 1% of vote-by-mail batches and 1% of provisional ballot batches, each drawn from sequentially numbered batch lists. Because the November 4, 2025 election consisted of a single statewide contest appearing on a one-card ballot, the initial precinct selection was sufficient to include all contests in the manual tally, and no additional precincts were required. In total, seven VBM batches (54, 334, 92, 418, 427, 526 and 211) and one provisional batch (6801) were randomly selected for inclusion in the 1% manual tally. Once the random selection was complete, Department staff gathered all selected ballots in preparation for the tally.

## Conducting the 1% Manual Tally

The 1% manual tally of the randomly selected precincts and batches began at 8:30 a.m., Thursday, November 20, 2025, and was completed on Thursday, November 20, 2025. The manual tally was conducted in the San Francisco City Hall, Room 68. The manual tally was open to public observation both in person and via live streaming on the Department's website at sfelections.gov/live.

For each selected precinct and batch, Department personnel manually tallied votes cast on the ballots, including polling place ballots cast using the Ballot Scanning Machines (BSM), and accepted vote-by-mail and provisional ballots, including those issued at the Department's City Hall Voting Center. Vote-by-mail and provisional ballots, and paper duplications of ballots through the remake process using the Ballot Marking Device are tabulated using the ImageCast Central (ICC) machines. The manual counts were then compared against the results reports generated from the voting system. If there were any discrepancies between the two tallies, the Department sought resolution or explanations for these discrepancies and documented the resolutions using Manual Tally Incident forms.

Department personnel worked in two, four-person teams to manually tally votes on polling place, vote-by-mail, and provisional ballots. Each team was assigned one precinct or one batch to count at a time. After all the votes for a contest had been counted, a supervisor verified whether the manual count matched the machine count. If all the vote counts matched, the team proceeded to the next batch until all cards had been manually tallied.

**Results of the 1% Manual Tally**

In accordance with the Post-Election Manual Tally Emergency Regulations, a "variance" means any difference between the machine tally and the manual tally for a contest, including, but not limited to, differences due to machine malfunction, operator error, or voter error in marking a ballot. Upon completion of the manual tally associated with ballots cast in San Francisco for the November 4, 2025, Statewide Special Election, the Department found no incidents of mismatches in votes tallied compared to the votes that the voting system reported.

Overall, the manual tally experienced no variances with the machine counts. The results of the 1% manual tally verified that the voting equipment used in the November 4, 2025, Statewide Special Election accurately tabulated and reported votes cast in this election.

The following are tables that summarize the manual tallies.
Part I. Randomly Selected Precincts and Contests Tallied for the 1% Manual Tally
Part II. Summary of Results of the 1% Manual Tally
Part III. Comparison of Manual and Machine Tallies (for discrepancies only)

**Part I:** Randomly Selected Precincts, Batches, and Contests Tallied for the 1% Manual Tallies

| **Randomly Selected Precincts/Batches and Contests Tallied for the 1% Manual Tally<br>November 4, 2025, Statewide Special Election** | | | |
|---|---|---|---|
| Initial precincts selected for Precinct Ballots | | | |
| **Order Drawn** | **Precinct** | **Ballot Type** | **Contests Tallied** |
| 1st | 9216 | 1 | All |
| 7 batches selected for VBM Ballots (3,065 total VBM cards tallied, or 1.151% of 266,287 VBM cards) | | | |
| **Order Drawn** | **Batch** | **Ballot Type** | **Contests Tallied** |
| 1st | 54 | 1 | All |
| 2nd | 334 | 1 | All |
| 3rd | 92 | 1 | All |
| 4th | 418 | 1 | All |
| 5th | 427 | 1 | All |
| 6th | 526 | 1 | All |
| 7th | 211 | 1 | All |
| One batch selected for PV Ballots (630 total PV cards tallied, or 14.218% of 4,431 PV cards) | | | |
| **Order Drawn** | **Batch** | **Ballot Type** | **Contests Tallied** |
| 1st | 6801 | 1 | All |

**Part II**: Summary of Results of the 1% Manual Tallies

| Summary of Results of the 1% Manual Tally | | | |
|---|---|---|---|
| **Precinct** | **Contests Tallied** | **Precinct Ballots** | |
| | | **Discrepancies found?** | **Causes** |
| 9216 | All | No | NA |
| **VBM Batch** | **Contests Tallied** | **Vote-by-Mail Ballots** | |
| **(Box) #** | | **Discrepancies found?** | **Causes** |
| 54 | All | No | NA |
| 334 | All | No | NA |
| 92 | All | No | NA |
| 418 | All | No | NA |
| 427 | All | No | NA |
| 526 | All | No | NA |
| 211 | All | No | NA |
| **PV Batch** | **Contests Tallied** | **Provisional Ballots** | |
| **(Box) #** | | **Discrepancies found?** | **Causes** |
| 6801 | All | No | NA |

**Part III**: Comparison of Manual and Machine Tallies (for discrepancies only)

The manual tally of votes did not experience any discrepancies with the official results reported by the voting system.

This 1% Manual tally was conducted in accordance with California Elections Code section 15360(c) and California Code of Regulations, Title 2, Division 7, Chapter 4.7.

This report was provided to the California Secretary of State on December 3, 2025.

John Arntz, Director of Elections

December 3, 2025

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 3 12B Waiver Request Forms |
| **Date:** | Thursday, December 4, 2025 10:45:25 AM |
| **Attachments:** | 3 12B Waiver Request Forms.pdf |

Hello,

Please see attached three 12B waiver request forms.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

| | |
|---|---|
| **From:** | CCSF IT Service Desk |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | CMD12B0004640 - "Request to Waive 12B Requirements" has been Approved by (POL) Department Head (Kimmie Wu) |
| **Date:** | Monday, December 1, 2025 3:28:14 PM |
| **Attachments:** | image |

# Contract Monitoring Division

SF Board of Supervisors,

This is to inform you that CMD12B0004640 - 'Request to Waive 12B Requirements' has been approved by (POL) Department Head (Kimmie Wu).

**Summary of Request**

**Requester:** Robert Ashpole
**Department:** POL
**Waiver Justification:** 12B.5-1(d)(1) (No Vendors Comply)
**Supplier ID:** 0000012236
**Requested total cost:** $4,100.00
**Short Description**: 12B Waiver request for Rice Lakes Weighing systems

Take me to the CMD 12B Waiver Request

For additional questions regarding this waiver request please contact cmd.equalbenefits@sfgov.org

Thank you.

Ref:TIS6302243_m3RMU6mR5d831XuoEmaQ

**Report Title:** CMD 12B Waiver Details

**Run Date and Time:** 2025-12-03 11:42:35 Pacific Standard Time

**Run by:** ServiceNow Admin

**Table name:** u_cmd_12b_waiver

## CMD 12B Waiver

| | | | |
|---|---|---|---|
| Number: | CMD12B0004640 | Request Status: | Awaiting CMD Analyst Approval |
| Requested for: | Robert Ashpole | State: | Work in Progress |
| Department Head/Delegated authority: | Kimmie Wu | Waiver Type: | 12B Waiver |
| | | 12B Waiver Type: | Standard |
| Opened: | 2025-12-01 14:44:21 | Requesting Department: | POL |
| | | Requester Phone: | (415) 837-7211 |
| | | Awaiting Info from: | |
| | | Awaiting Info reason: | |
| | | Opened by: | Robert Ashpole |
| | | Watch list: | Robert Ashpole, Fannie Yeung |

Short Description:

12B Waiver request for Rice Lakes Weighing systems

| | | | |
|---|---|---|---|
| Supplier ID: | 0000012236 | Requested Amount: | $4,100.00 |
| Is this a new waiver or are you modifying a previously approved waiver?: | New Waiver | Increase Amount: | $0.00 |
| | | Previously Approved Amount: | $0.00 |
| Last Approved 12B Waiver Request: | | Total Requested Amount: | $4,100.00 |

| | | | |
|---|---|---|---|
| Document Type: | Purchase Order | Enter Contract ID: | |
| 12B Waiver Justification: | 12B.5-1(d)(1) (No Vendors Comply) | Enter Requisition ID: | |
| City Treasurer: | Jose Cisneros | Enter Purchase Order ID: | 0000988459 |
| Admin Code Chapter: | Chapter 21 Goods and Services | Enter Direct Voucher ID: | |
| Select Chapter 21.04 Section: | | Waiver Start Date: | 2025-11-21 |
| Confirm Dept. has documented this agreement as a Sole Source: | | Waiver End Date: | 2026-11-21 |

| | |
|---|---|
| Advertising: | false |
| Commodities, Equipment and Hardware : | true |
| Equipment and Vehicle Lease: | false |
| On Premise Software and Support: | false |
| Online Content, Reports, Periodicals and Journals: | false |
| Professional and General Services: | false |
| Software as a Service (SaaS) and Cloud Software Applications: | false |
| Vehicles and Trailers: | false |

Detail the purpose of this contract is and what goods and/or services the contra:

Rice Lake Weighing Systems / Heusser Neweigh is the only local provider for metrology and calibration services including calibration and sale of instruments for measuring mass, temperature, force, dimensions, physical measurements, pressure and volume. They are the only company that can provide pick up, transport, and calibration for the Laboratory's critical measuring equipment that must undergo annual calibration in order to comply with our accreditation requirements. This company also provides certificates of accreditation for their products as required for our quality assurance program. The crime lab would utilize this vendor for calibration of and purchase of equipment in the Forensic Biology, Firearms and Forensic Alcohol Units.

If you have made an effort to have the supplier comply, explain it here. If not,:

I have called on 11/21/25 and was told that this is still an issue and corporate office in Wisconsin has been tasked with completing the 12B, but no specific update as of now.

Cancel Notes:

## CMD Analyst

| | |
|---|---|
| CMD Analyst: | CMD Director: |
| CMD Analyst Decision: | Select the reason for this request: |

CMD Analyst Comments:

## CMD Director

| | |
|---|---|
| CMD Director: | CMD Director Decision: |

Reason for Determination:

## 12B.5-1(a)(1) (Non Property Contracts)

Select OCA Solicitation Waiver:

Sole Source – Non Property Contract Justification Reason:

Has DPH Commission qualified this agreement as a Sole Source under Chpt 21.42?:

Has MTA qualified this agreement as a Sole Source under Charter Sec. 8A.102(b)?:

Explain why this is a Sole Source:

## 12B.5-1(a)(1) (Property Contracts)

City Property Status:

Has DPH Commission qualified this agreement as a Sole Source under Chpt 21.42?:

Has MTA qualified this agreement as a Sole Source under Charter Sec. 8A.102(b)?:

CMD 12B.5-1(a)(1) (Sole Source – Property Contracts) Question1:

CMD 12B.5-1(a)(1) (Sole Source – Property Contracts) Question2:

## 12B.5-1(a)(1)(Property Contracts)

Sole Source – Property Contract Justification Reason:

## 12B.5-1(a)(2) (Declared Emergency)

| | |
|---|---|
| 12B.5-1(a)(2) (Declared Emergency) Question2: | |

## 12B.5-1(a)(3) (Specialized Litigation)

| | |
|---|---|
| 12B.5-1(a)(3) (Specialized Litigation) Question1 : | |
| 12B.5-1(a)(3) (Specialized Litigation) Question2: | |

## 12B.5-1(b) (Public Entity-Non Property)

| | |
|---|---|
| Select OCA Solicitation Waiver: | |
| Public Entity Sole Source – Non Property Contract Justification Reason: | |
| Has DPH Commission qualified this agreement as a Sole Source under Chpt 21.42?: | |
| Has MTA qualified this agreement as a Sole Source under Charter Sec. 8A.102(b)?: | |
| Explain why this is a Sole Source (Public Entity): | |

## 12B.5-1(b) (Public Entity-Property)

| | |
|---|---|
| 12B.5-1(b) (Public Entity SS-PC) Question1: | |

## 12B.5-1(b) (Public Entity - Substantial)

| | |
|---|---|
| 12B.5-1(b) (Public Entity-SPI) Question1: | |

## 12B.5-1(c) (Conflicting Grant Terms)

| | |
|---|---|
| 12B.5-1(c) (Conflicting Grant Terms) Question1: | |
| 12B.5-1(c) (Conflicting Grant Terms) Question2: | |

## 12B.5-1(e) Investments and Services

| | |
|---|---|
| 12B.5-1(e) Investments Question1: | |
| 12B.5-1(e) Investments Question2: | |
| 12B.5-1(e) Investments Question3: | |

## 12B.5-1(f) (SFPUC Bulk Water, Power and

| | |
|---|---|
| Bulk Water: | false |
| Bulk Power: | false |
| Bulk Gas: | false |

12B.5-1(f) (SFPUC Bulk WPG) Question2:

12B.5-1(f) (SFPUC Bulk WPG) Question1:

## 12B.5-1(d)(1) (No Vendors Comply)

12B.5-1(d)(1) (No Vendors Comply) Question1:

Rice Lake Weighing Systems / Heusser Neweigh is the only local provider for metrology and calibration services including calibration and sale of instruments for measuring mass, temperature, force, dimensions, physical measurements, pressure and volume. They are the only company that can provide pick up, transport, and calibration for the Laboratory's critical measuring equipment that must undergo annual calibration in order to comply with our accreditation requirements. This company also provides certificates of accreditation for their products as required for our quality assurance program. The crime lab would utilize this vendor for calibration of and purchase of equipment in the Forensic Biology, Firearms and Forensic Alcohol Units.

12B.5-1(d)(1) (No Vendors Comply) Question2:

Rice Lake Weighing Systems / Heusser Neweigh is the only local provider for metrology and calibration services including calibration and sale of instruments for measuring mass, temperature, force, dimensions, physical measurements, pressure and volume. They are the only company that can provide pick up, transport, and calibration for the Laboratory's critical measuring equipment that must undergo annual calibration in order to comply with our accreditation requirements. This company also provides certificates of accreditation for their products as required for our quality assurance program. The crime lab would utilize this vendor for calibration of and purchase of equipment in the Forensic Biology, Firearms and Forensic Alcohol Units.

12B.5-1(d)(1) (No Vendors Comply) Question3:

I have called and spoken to the local sales reps. All 'legal' forms are run through the corporate office in Wisconsin and it is 'pending' as of now. No specific update.

12B.5-1(d)(1) (No Vendors Comply) Question4:

There are no other vendors available who meet the compliance and can provide the needed goods/services and we've taken reasonable steps to find a compliant vendor, but this one is essential or unique.

12B.5-1(d)(1) (No Vendors Comply) Question5:

Not Applicable

## 12B.5-1(d)(1)(No Vendors Comply)

12B.5-1(d)(1) (No Vendors Comply) Limited Question1:

12B.5-1(d)(1) (No Vendors Comply) Limited Question2 :

12B.5-1(d)(1) (No Vendors Comply) Limited Question3:

12B.5-1(d)(1) (No Vendors Comply) Limited Question4:

## 12B.5-1(d)(2) (Bulk Purchasing)

Select OCA Solicitation Waiver:

Has MTA qualified agreement as Bulk Purchasing under Charter Sec. 8A.102(b)?:

Detail the nature of this Bulk Purchasing transaction:

12B.5-1(d)(2) (Bulk Purchasing) Question1:

12B.5-1(d)(2) (Bulk Purchasing) Question2:

12B.5-1(d)(2) (Bulk Purchasing) Question3:

12B.5-1(d)(2) (Bulk Purchasing) Question4:

12B.5-1(d)(2) (Bulk Purchasing) Question5:

12B.5-1(d)(2) (Bulk Purchasing) Question6:

## 12B.5-1(d)(3) (Sham Entity)

12B.5-1(d)(3) (Sham Entity) Question1:

12B.5-1(d)(3) (Sham Entity) Question2:

12B.5-1(d)(3) (Sham Entity) Question3:

12B.5-1(d)(3) (Sham Entity) Question4:

## Activities

Additional comments:

**Related List Title:** Approval List

**Table name:** sysapproval_approver

**Query Condition:** Approval for = CMD12B0004640

**Sort Order:** Order in ascending order

1 Approvals

| State | Approver | Approving | Created | Approval set | Comments |
|---|---|---|---|---|---|
| Approved | Kimmie Wu | CMD 12B Waiver: CMD12B0004640 | 2025-12-01 15:18:46 | | 2025-12-01 15:27:16 - Kimmie Wu (Comments) reply from: Kimmie.Wu@sfgov.org<br><br>Ref:TIS6302224_dQnS0NEXSDnE2QdKwbi3<br><br>[Image]<br><br>Kimmie Wu<br><br>Chief Financial Officer<br><br>San Francisco Police Department<br><br>Fiscal Division<br><br>1245 3rd St., 6th Floor<br><br>San Francisco, CA 94158<br><br>Phone: 415.837.7213<br><br>Cell: 415.640.7757<br><br>Email: kimmie.wu@sfgov.org< mailto:kimmie.wu@sfgov |

| State | Approver | Approving | Created | Approval set | Comments |
|---|---|---|---|---|---|
| | | | | | .org><br><br>CONFIDENTIALITY NOTICE: This communication and its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws, including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication. |

**Related List Title:** Metric List

**Table name:** metric_instance

8 Metrics

| Created | Definition | ID | Value | Start | End | Duration | Calculation complete |
|---|---|---|---|---|---|---|---|
| 2025-12-01 14:46:35 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004640 | Draft | 2025-12-01 14:46:31 | 2025-12-01 15:18:46 | 32 Minutes | true |
| 2025-12-01 15:18:50 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004640 | Draft | 2025-12-01 15:18:46 | 2025-12-01 15:18:46 | 0 Seconds | true |
| 2025-12-01 15:18:50 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004640 | Dept. Head approval | 2025-12-01 15:18:46 | 2025-12-01 15:27:16 | 8 Minutes | true |
| 2025-12-01 15:27:20 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004640 | Awaiting CMD Analyst Approval | 2025-12-01 15:27:16 | | | false |
| 2025-12-01 14:46:35 | Assigned to Duration | CMD 12B Waiver: CMD12B0004640 | Draft | 2025-12-01 14:46:31 | 2025-12-01 15:18:46 | 32 Minutes | true |
| 2025-12-01 15:18:50 | Assigned to Duration | CMD 12B Waiver: CMD12B0004640 | Draft | 2025-12-01 15:18:46 | 2025-12-01 15:18:46 | 0 Seconds | true |
| 2025-12-01 15:18:50 | Assigned to Duration | CMD 12B Waiver: CMD12B0004640 | Dept. Head approval | 2025-12-01 15:18:46 | 2025-12-01 15:27:16 | 8 Minutes | true |

| Created | Definition | ID | Value | Start | End | Duration | Calculation complete |
|---|---|---|---|---|---|---|---|
| 2025-12-01 15:27:20 | Assigned to Duration | CMD 12B Waiver: CMD12B0004640 | Awaiting CMD Analyst Approval | 2025-12-01 15:27:16 | | | false |

| | |
|---|---|
| **From:** | CCSF IT Service Desk |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | CMD12B0004638 - "Request to Waive 12B Requirements" has been Approved by (DPH) Department Head (Michelle Ruggels) |
| **Date:** | Monday, December 1, 2025 2:00:00 PM |
| **Attachments:** | image |

# Contract Monitoring Division

SF Board of Supervisors,

This is to inform you that CMD12B0004638 - 'Request to Waive 12B Requirements' has been approved by (DPH) Department Head (Michelle Ruggels).

**Summary of Request**

**Requester:** Alejandro Garcia
**Department:** DPH
**Waiver Justification:** 12B.5-1(d)(2) (Bulk Purchasing)
**Supplier ID:** 0000059745
**Requested total cost:** $7,000.00
**Short Description**: ZOLL® Medical Corporation has the exclusive right to distribute the 3100A and 3100B High Frequency Oscillatory Ventilators

Take me to the CMD 12B Waiver Request

For additional questions regarding this waiver request please contact cmd.equalbenefits@sfgov.org

Thank you.

Ref:TIS6301864_i3y1ZOmorieEpTpDLLBX

**Report Title:** CMD 12B Waiver Details

**Run Date and Time:** 2025-12-03 11:43:21 Pacific Standard Time

**Run by:** ServiceNow Admin

**Table name:** u_cmd_12b_waiver

## CMD 12B Waiver

| | | | |
|---|---|---|---|
| Number: | CMD12B0004638 | Request Status: | Awaiting CMD Analyst Approval |
| Requested for: | Alejandro Garcia | State: | Work in Progress |
| Department Head/Delegated authority: | Michelle Ruggels | Waiver Type: | 12B Waiver |
| | | 12B Waiver Type: | Standard |
| Opened: | 2025-12-01 13:32:17 | Requesting Department: | DPH |
| | | Requester Phone: | (628) 206-7456 |
| | | Awaiting Info from: | |
| | | Awaiting Info reason: | |
| | | Opened by: | Alejandro Garcia |
| | | Watch list: | |

Short Description:

ZOLL® Medical Corporation has the exclusive right to distribute the 3100A and 3100B High Frequency Oscillatory Ventilators

| | | | |
|---|---|---|---|
| Supplier ID: | 0000059745 | Requested Amount: | $7,000.00 |
| Is this a new waiver or are you modifying a previously approved waiver?: | New Waiver | Increase Amount: | $0.00 |
| | | Previously Approved Amount: | $0.00 |
| Last Approved 12B Waiver Request: | | Total Requested Amount: | $7,000.00 |
| Document Type: | Purchase Order | Enter Contract ID: | |
| 12B Waiver Justification: | 12B.5-1(d)(2) (Bulk Purchasing) | Enter Requisition ID: | |
| City Treasurer: | Jose Cisneros | Enter Purchase Order ID: | 0000989138 |
| Admin Code Chapter: | Chapter 21A GPO (DPH Only) | Enter Direct Voucher ID: | |
| Select Chapter 21.04 Section: | | Waiver Start Date: | 2025-11-20 |
| Confirm Dept. has documented this agreement as a Sole Source: | | Waiver End Date: | 2026-08-31 |

| | |
|---|---|
| Advertising: | false |
| Commodities, Equipment and Hardware : | true |
| Equipment and Vehicle Lease: | false |
| On Premise Software and Support: | false |
| Online Content, Reports, Periodicals and Journals: | false |
| Professional and General Services: | true |
| Software as a Service (SaaS) and Cloud Software Applications: | false |
| Vehicles and Trailers: | false |

Detail the purpose of this contract is and what goods and/or services the contra:

ZOLL® Medical Corporation has the exclusive right to distribute the 3100A and 3100B High Frequency Oscillatory Ventilators (HFOV) and may, at its discretion, supply these products to other distributors for resale. ZOLL owns the manufacturing rights for these ventilator systems. We will need this 12b waiver in order to create a temporary blanket contract to use for this vendor since the vendor is not currently registered as 12b in our system.

If you have made an effort to have the supplier comply, explain it here. If not,:

Yes, we have provided the contact information of the Equal Benefits Program Contract Compliance unit and asked the supplier to follow up with them

Cancel Notes:

## CMD Analyst

| | |
|---|---|
| CMD Analyst: | CMD Director: |
| CMD Analyst Decision: | Select the reason for this request: |

CMD Analyst Comments:

## CMD Director

| | |
|---|---|
| CMD Director: | CMD Director Decision: |

Reason for Determination:

## 12B.5-1(a)(1) (Non Property Contracts)

Select OCA Solicitation Waiver:

Sole Source – Non Property Contract Justification Reason:

Has DPH Commission qualified this agreement as a Sole Source under Chpt 21.42?:

Has MTA qualified this agreement as a Sole Source under Charter Sec. 8A.102(b)?:

Explain why this is a Sole Source:

## 12B.5-1(a)(1) (Property Contracts)

City Property Status:

Has DPH Commission qualified this agreement as a Sole Source under Chpt 21.42?:

Has MTA qualified this agreement as a Sole Source under Charter Sec. 8A.102(b)?:

CMD 12B.5-1(a)(1) (Sole Source – Property Contracts) Question1:

CMD 12B.5-1(a)(1) (Sole Source – Property Contracts) Question2:

## 12B.5-1(a)(1)(Property Contracts)

Sole Source – Property Contract Justification Reason:

## 12B.5-1(a)(2) (Declared Emergency)

12B.5-1(a)(2) (Declared Emergency) Question2:

## 12B.5-1(a)(3) (Specialized Litigation)

12B.5-1(a)(3) (Specialized Litigation) Question1 :

12B.5-1(a)(3) (Specialized Litigation) Question2:

## 12B.5-1(b) (Public Entity-Non Property)

| | |
|---|---|
| Select OCA Solicitation Waiver: | |
| Public Entity Sole Source – Non Property Contract Justification Reason: | |
| Has DPH Commission qualified this agreement as a Sole Source under Chpt 21.42?: | |
| Has MTA qualified this agreement as a Sole Source under Charter Sec. 8A.102(b)?: | |

Explain why this is a Sole Source (Public Entity):

## 12B.5-1(b) (Public Entity-Property)

12B.5-1(b) (Public Entity SS-PC) Question1:

## 12B.5-1(b) (Public Entity - Substantial)

| | |
|---|---|
| 12B.5-1(b) (Public Entity-SPI) Question1: | |

## 12B.5-1(c) (Conflicting Grant Terms)

12B.5-1(c) (Conflicting Grant Terms) Question1:

12B.5-1(c) (Conflicting Grant Terms) Question2:

## 12B.5-1(e) Investments and Services

12B.5-1(e) Investments Question1:

12B.5-1(e) Investments Question2:

12B.5-1(e) Investments Question3:

## 12B.5-1(f) (SFPUC Bulk Water, Power and

| | |
|---|---|
| Bulk Water: | false |
| Bulk Power: | false |
| Bulk Gas: | false |
| 12B.5-1(f) (SFPUC Bulk WPG) Question2: | |

12B.5-1(f) (SFPUC Bulk WPG) Question1:

## 12B.5-1(d)(1) (No Vendors Comply)

12B.5-1(d)(1) (No Vendors Comply) Question1:

12B.5-1(d)(1) (No Vendors Comply) Question2:

12B.5-1(d)(1) (No Vendors Comply) Question3:

12B.5-1(d)(1) (No Vendors Comply) Question4:

12B.5-1(d)(1) (No Vendors Comply) Question5:

## 12B.5-1(d)(1)(No Vendors Comply)

12B.5-1(d)(1) (No Vendors Comply) Limited Question1:

12B.5-1(d)(1) (No Vendors Comply) Limited Question2 :

12B.5-1(d)(1) (No Vendors Comply) Limited Question3:

12B.5-1(d)(1) (No Vendors Comply) Limited Question4:

## 12B.5-1(d)(2) (Bulk Purchasing)

Select OCA Solicitation Waiver:

Has MTA qualified agreement as Bulk Purchasing under Charter Sec. 8A.102(b)?:

Detail the nature of this Bulk Purchasing transaction:

12B.5-1(d)(2) (Bulk Purchasing) Question1:

Per Admin Code Section 21A.2(a)
(2) Healthcare GPOs obtain cost savings by pooling their members' purchasing power and negotiating lower prices from their participating vendors. Healthcare GPOs also provide their members with cost savings by conducting a competitive bidding process for some – though not all – of the goods and services offered by their suppliers.
(3) Membership in Healthcare GPOs allows DPH to employ a streamlined process for procuring goods and services, thereby reducing administrative burdens, facilitating improved quality of care, and saving DPH millions of dollars each fiscal year.

12B.5-1(d)(2) (Bulk Purchasing) Question2:

Per Admin Code Section 21A.2(a)
(2) Healthcare GPOs obtain cost savings by pooling their members' purchasing power and negotiating lower prices from their participating vendors. Healthcare GPOs also provide their members with cost savings by conducting a competitive bidding process for some – though not all – of the goods and services offered by their suppliers.
(3) Membership in Healthcare GPOs allows DPH to employ a streamlined process for procuring goods and services, thereby reducing administrative burdens, facilitating improved quality of care, and saving DPH millions of dollars each fiscal year.

12B.5-1(d)(2) (Bulk Purchasing) Question3:

To fulfill the Board's desire to obtain the cost savings from using a GPO, pursuant to Chapter 21A.

12B.5-1(d)(2) (Bulk Purchasing) Question4:

Yes, we have provided the contact information of the Equal Benefits Program Contract Compliance unit and asked the supplier to follow up with them

12B.5-1(d)(2) (Bulk Purchasing) Question5:

The purpose of Chapter 12B is to ensure equal access to benefits, including health benefits, regardless of one's protected category. The use of a GPO ensures DPH can access the goods and services it needs to provide healthcare to SF residents in a cost-effective and reliable manner, thereby increasing their access to healthcare regardless of their status. In this regard, the use of this Vizient contractor is aligned with the intent of Chapter 12B.

12B.5-1(d)(2) (Bulk Purchasing) Question6:

Yes

## 12B.5-1(d)(3) (Sham Entity)

12B.5-1(d)(3) (Sham Entity) Question1:

12B.5-1(d)(3) (Sham Entity) Question2:

12B.5-1(d)(3) (Sham Entity) Question3:

12B.5-1(d)(3) (Sham Entity) Question4:

## Activities

Additional comments:

**Related List Title:** Approval List
**Table name:** sysapproval_approver
**Query Condition:** Approval for = CMD12B0004638
**Sort Order:** Order in ascending order

1 Approvals

| State | Approver | Approving | Created | Approval set | Comments |
|---|---|---|---|---|---|
| Approved | Michelle Ruggels | CMD 12B Waiver: CMD12B0004638 | 2025-12-01 13:39:28 | | |

**Related List Title:** Metric List
**Table name:** metric_instance

8 Metrics

| Created | Definition | ID | Value | Start | End | Duration | Calculation complete |
|---|---|---|---|---|---|---|---|
| 2025-12-01 13:35:00 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004638 | Draft | 2025-12-01 13:34:58 | 2025-12-01 13:39:28 | 4 Minutes | true |
| 2025-12-01 13:39:30 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004638 | Draft | 2025-12-01 13:39:28 | 2025-12-01 13:39:28 | 0 Seconds | true |
| 2025-12-01 13:39:30 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004638 | Dept. Head approval | 2025-12-01 13:39:28 | 2025-12-01 13:59:19 | 19 Minutes | true |
| 2025-12-01 13:59:20 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004638 | Awaiting CMD Analyst Approval | 2025-12-01 13:59:19 | | | false |
| 2025-12-01 13:35:00 | Assigned to Duration | CMD 12B Waiver: CMD12B0004638 | Draft | 2025-12-01 13:34:58 | 2025-12-01 13:39:28 | 4 Minutes | true |
| 2025-12-01 13:39:30 | Assigned to Duration | CMD 12B Waiver: CMD12B0004638 | Draft | 2025-12-01 13:39:28 | 2025-12-01 13:39:28 | 0 Seconds | true |
| 2025-12-01 13:39:31 | Assigned to Duration | CMD 12B Waiver: CMD12B0004638 | Dept. Head approval | 2025-12-01 13:39:28 | 2025-12-01 13:59:19 | 19 Minutes | true |
| 2025-12-01 13:59:20 | Assigned to Duration | CMD 12B Waiver: CMD12B0004638 | Awaiting CMD Analyst Approval | 2025-12-01 13:59:19 | | | false |

| | |
|---|---|
| **From:** | CCSF IT Service Desk |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | CMD12B0004633 - "Request to Waive 12B Requirements" has been Approved by (CON) Department Head (Michael Lambert) |
| **Date:** | Tuesday, November 25, 2025 4:08:41 PM |
| **Attachments:** | image |

# Contract Monitoring Division

SF Board of Supervisors,

This is to inform you that CMD12B0004633 - 'Request to Waive 12B Requirements' has been approved by (CON) Department Head (Michael Lambert).

**Summary of Request**

**Requester:** Lisseth Salazar Lopez
**Department:** CON
**Waiver Justification:** 12B.5-1(d)(1) (No Vendors Comply)
**Supplier ID:** 0000030653
**Requested total cost:** $19,987.00
**Short Description**: Adult Physical Materials

Take me to the CMD 12B Waiver Request

For additional questions regarding this waiver request please contact cmd.equalbenefits@sfgov.org

Thank you.

Ref:TIS6294193_Q7bK2LXSgk8GHeIaj9Hj

**Report Title:** CMD 12B Waiver Details
**Run Date and Time:** 2025-12-03 11:44:51 Pacific Standard Time
**Run by:** ServiceNow Admin
**Table name:** u_cmd_12b_waiver

## CMD 12B Waiver

| | | | |
|---|---|---|---|
| Number: | CMD12B0004633 | Request Status: | Completed |
| Requested for: | Lisseth Salazar Lopez | State: | Completed |
| Department Head/Delegated authority: | Michael Lambert | Waiver Type: | 12B Waiver |
| | | 12B Waiver Type: | Limited (Under 250K) |
| Opened: | 2025-11-18 16:33:32 | Requesting Department: | CON |
| | | Requester Phone: | (415) 557-4244 |
| | | Awaiting Info from: | |
| | | Awaiting Info reason: | |
| | | Opened by: | Lisseth Salazar Lopez |
| | | Watch list: | |

Short Description:

Adult Physical Materials

| | | | |
|---|---|---|---|
| Supplier ID: | 0000030653 | Requested Amount: | $19,987.00 |
| Is this a new waiver or are you modifying a previously approved waiver?: | New Waiver | Increase Amount: | $0.00 |
| | | Previously Approved Amount: | $0.00 |
| Last Approved 12B Waiver Request: | | Total Requested Amount: | $19,987.00 |
| Document Type: | Purchase Order | Enter Contract ID: | |
| 12B Waiver Justification: | 12B.5-1(d)(1) (No Vendors Comply) | Enter Requisition ID: | |
| City Treasurer: | Jose Cisneros | Enter Purchase Order ID: | 0000988699 |
| Admin Code Chapter: | Chapter 21 Goods and Services | Enter Direct Voucher ID: | |
| Select Chapter 21.04 Section: | | Waiver Start Date: | 2025-11-18 |
| Confirm Dept. has documented this agreement as a Sole Source: | | Waiver End Date: | 2026-06-30 |

| | |
|---|---|
| Advertising: | false |
| Commodities, Equipment and Hardware : | true |
| Equipment and Vehicle Lease: | false |
| On Premise Software and Support: | false |
| Online Content, Reports, Periodicals and Journals: | false |
| Professional and General Services: | false |
| Software as a Service (SaaS) and Cloud Software Applications: | false |
| Vehicles and Trailers: | false |

Detail the purpose of this contract is and what goods and/or services the contra:

Amoeba is a specialized source for music recording in vinyl format (LPs) for adults. They offer a wide selection of recordings on vinyl; none of our national suppliers carry recordings on vinyl.

If you have made an effort to have the supplier comply, explain it here. If not,:

2. I have emailed the vendor encouraging them to be 12B compliant and attached the 12B Compliance Process instructions

Cancel Notes:

## CMD Analyst

| | | | |
|---|---|---|---|
| CMD Analyst: | Vivian Liu | CMD Director: | Regina Chan |
| CMD Analyst Decision: | Reviewed and Approved | Select the reason for this request: | 12B.5-1(d)(1) (No Vendors Comply) |
| CMD Analyst Comments: | Approved per 12B.5-1(d)(1) | | |

## CMD Director

| | | | |
|---|---|---|---|
| CMD Director: | Regina Chan | CMD Director Decision: | Reviewed and Approved |

Reason for Determination:

Approved per 12B.5-1(d)(1)

## 12B.5-1(a)(1) (Non Property Contracts)

| | |
|---|---|
| Select OCA Solicitation Waiver: | |
| Sole Source – Non Property Contract Justification Reason: | |
| Has DPH Commission qualified this agreement as a Sole Source under Chpt 21.42?: | |
| Has MTA qualified this agreement as a Sole Source under Charter Sec. 8A.102(b)?: | |

Explain why this is a Sole Source:

## 12B.5-1(a)(1) (Property Contracts)

| | |
|---|---|
| City Property Status: | |
| Has DPH Commission qualified this agreement as a Sole Source under Chpt 21.42?: | |
| Has MTA qualified this agreement as a Sole Source under Charter Sec. 8A.102(b)?: | |

CMD 12B.5-1(a)(1) (Sole Source – Property Contracts) Question1:

CMD 12B.5-1(a)(1) (Sole Source – Property Contracts) Question2:

## 12B.5-1(a)(1)(Property Contracts)

| | |
|---|---|
| Sole Source – Property Contract Justification Reason: | |

## 12B.5-1(a)(2) (Declared Emergency)

12B.5-1(a)(2) (Declared Emergency) Question2:

## 12B.5-1(a)(3) (Specialized Litigation)

12B.5-1(a)(3) (Specialized Litigation) Question1 :

12B.5-1(a)(3) (Specialized Litigation) Question2:

## 12B.5-1(b) (Public Entity-Non Property)

| | |
|---|---|
| Select OCA Solicitation Waiver: | |
| Public Entity Sole Source – Non Property Contract Justification Reason: | |
| Has DPH Commission qualified this agreement as a Sole Source under Chpt 21.42?: | |
| Has MTA qualified this agreement as a Sole Source under Charter Sec. 8A.102(b)?: | |

Explain why this is a Sole Source (Public Entity):

## 12B.5-1(b) (Public Entity-Property)

12B.5-1(b) (Public Entity SS-PC) Question1:

## 12B.5-1(b) (Public Entity - Substantial)

| | |
|---|---|
| 12B.5-1(b) (Public Entity-SPI) Question1: | |

## 12B.5-1(c) (Conflicting Grant Terms)

12B.5-1(c) (Conflicting Grant Terms) Question1:

12B.5-1(c) (Conflicting Grant Terms) Question2:

## 12B.5-1(e) Investments and Services

12B.5-1(e) Investments Question1:

12B.5-1(e) Investments Question2:

12B.5-1(e) Investments Question3:

## 12B.5-1(f) (SFPUC Bulk Water, Power and

| | |
|---|---|
| Bulk Water: | false |
| Bulk Power: | false |
| Bulk Gas: | false |
| 12B.5-1(f) (SFPUC Bulk WPG) Question2: | |

12B.5-1(f) (SFPUC Bulk WPG) Question1:

## 12B.5-1(d)(1) (No Vendors Comply)

12B.5-1(d)(1) (No Vendors Comply) Question1:

12B.5-1(d)(1) (No Vendors Comply) Question2:

12B.5-1(d)(1) (No Vendors Comply) Question3:

12B.5-1(d)(1) (No Vendors Comply) Question4:

12B.5-1(d)(1) (No Vendors Comply) Question5:

## 12B.5-1(d)(1)(No Vendors Comply)

12B.5-1(d)(1) (No Vendors Comply) Limited Question1:

These are items that the citizens of San Francisco came to expect us to carry. Not being able to provide these materials to our patrons is a disservice to them

12B.5-1(d)(1) (No Vendors Comply) Limited Question2 :

These are hard-to-source items and Amoeba is the best source we've found for vinyl recordings

12B.5-1(d)(1) (No Vendors Comply) Limited Question3:

It does not conflict. Vendor is reviewing 12B certification.

12B.5-1(d)(1) (No Vendors Comply) Limited Question4:

Yes

## 12B.5-1(d)(2) (Bulk Purchasing)

Select OCA Solicitation Waiver:

Has MTA qualified agreement as Bulk Purchasing under Charter Sec. 8A.102(b)?:

Detail the nature of this Bulk Purchasing transaction:

12B.5-1(d)(2) (Bulk Purchasing) Question1:

12B.5-1(d)(2) (Bulk Purchasing) Question2:

12B.5-1(d)(2) (Bulk Purchasing) Question3:

12B.5-1(d)(2) (Bulk Purchasing) Question4:

12B.5-1(d)(2) (Bulk Purchasing) Question5:

12B.5-1(d)(2) (Bulk Purchasing) Question6:

## 12B.5-1(d)(3) (Sham Entity)

12B.5-1(d)(3) (Sham Entity) Question1:

12B.5-1(d)(3) (Sham Entity) Question2:

12B.5-1(d)(3) (Sham Entity) Question3:

12B.5-1(d)(3) (Sham Entity) Question4:

## Activities

Additional comments:

**Related List Title:** Approval List

**Table name:** sysapproval_approver

**Query Condition:** Approval for = CMD12B0004633

**Sort Order:** Order in ascending order

1 Approvals

| State | Approver | Approving | Created | Approval set | Comments |
|---|---|---|---|---|---|
| Approved | Michael Lambert | CMD 12B Waiver: CMD12B0004633 | 2025-11-18 16:40:16 | | |

**Related List Title:** Metric List

**Table name:** metric_instance

12 Metrics

| Created | Definition | ID | Value | Start | End | Duration | Calculation complete |
|---|---|---|---|---|---|---|---|
| 2025-11-18 16:40:00 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004633 | Draft | 2025-11-18 16:39:59 | 2025-11-18 16:40:16 | 17 Seconds | true |
| 2025-11-18 16:40:20 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004633 | Draft | 2025-11-18 16:40:16 | 2025-11-18 16:40:16 | 0 Seconds | true |
| 2025-11-18 16:40:20 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004633 | Dept. Head approval | 2025-11-18 16:40:16 | 2025-11-25 16:07:45 | 6 Days 23 Hours 27 Minutes | true |
| 2025-11-25 16:07:45 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004633 | Awaiting CMD Analyst Approval | 2025-11-25 16:07:45 | 2025-12-01 08:36:02 | 5 Days 16 Hours 28 Minutes | true |
| 2025-12-01 08:36:05 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004633 | Awaiting CMD Director Approval | 2025-12-01 08:36:02 | 2025-12-01 08:36:17 | 15 Seconds | true |
| 2025-12-01 08:36:20 | OCA 12B Metric | CMD 12B Waiver: CMD12B0004633 | Completed | 2025-12-01 08:36:17 | | | false |
| 2025-11-18 16:40:00 | Assigned to Duration | CMD 12B Waiver: CMD12B0004633 | Draft | 2025-11-18 16:39:59 | 2025-11-18 16:40:16 | 17 Seconds | true |
| 2025-11-18 16:40:20 | Assigned to Duration | CMD 12B Waiver: CMD12B0004633 | Draft | 2025-11-18 16:40:16 | 2025-11-18 16:40:16 | 0 Seconds | true |
| 2025-11-18 16:40:20 | Assigned to Duration | CMD 12B Waiver: CMD12B0004633 | Dept. Head approval | 2025-11-18 16:40:16 | 2025-11-25 16:07:45 | 6 Days 23 Hours 27 Minutes | true |
| 2025-11-25 16:07:45 | Assigned to Duration | CMD 12B Waiver: CMD12B0004633 | Awaiting CMD Analyst Approval | 2025-11-25 16:07:45 | 2025-12-01 08:36:02 | 5 Days 16 Hours 28 Minutes | true |
| 2025-12-01 08:36:05 | Assigned to Duration | CMD 12B Waiver: CMD12B0004633 | Awaiting CMD Director Approval | 2025-12-01 08:36:02 | 2025-12-01 08:36:17 | 15 Seconds | true |
| 2025-12-01 08:36:20 | Assigned to Duration | CMD 12B Waiver: CMD12B0004633 | Completed | 2025-12-01 08:36:17 | | | false |

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: DPH Chapter 21B Advance Written Justification |
| **Date:** | Thursday, December 4, 2025 10:46:40 AM |
| **Attachments:** | CHESS HEALTH_21B Mayor and Board of Supervisors.pdf |

Hello,

Please see attached for one 21B waiver notification.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

---

**From:** Mach, Philip (DPH) <philip.mach@sfdph.org>
**Sent:** Monday, December 1, 2025 1:06 PM
**To:** Bonde, Aly (MYR) <aly.bonde@sfgov.org>
**Cc:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; OCA (ADM) <oca@sfgov.org>; Macaulay, Devin (CON) <devin.macaulay@sfgov.org>; Yuan, Jane (CON) <jane.yuan@sfgov.org>; Falcon, Victoria (DPH) <victoria.falcon@sfdph.org>; Ruggels, Michelle (DPH) <michelle.ruggels@sfdph.org>; Baker, Kim (DPH) <kim.baker@sfdph.org>
**Subject:** DPH Chapter 21B Advance Written Justification

Hello Aly,

As part of the requirements of SF Administrative Code Chapter 21B, attached is a copy of the

advance written justification to Mayor and Board of Supervisors form.

Please let us know if you have any questions.

Thanks,

Phil

This e-mail is intended for the recipient only. If Protected Health Information (PHI) is contained in this email, unauthorized disclosure may subject the discloser to civil or criminal penalties under state and federal privacy laws. If you received this email in error, notify me and destroy the email immediately.

Docusign Envelope ID: 024FC552-FAF9-48D9-8901-D17FEC5D16DC

## San Francisco Administrative Code Chapter 21B
## Advance written justification to Mayor and Board of Supervisors

**Department & Agreement Information** (*required)

**Department Name***: Department of Public Health
**Agreement Type*: Contract**
**Department Contact Name***: Michelle Ruggels
**Department Contact Phone #***: (628) 271-7549
**Department Contact Email***: michelle.ruggels@sfdph.org

**For Contracts, Requisitions, and Purchase Orders:**

**Contract PeopleSoft ID#**: 1000037430
**Anticipated Contract Amount**: $280, 000.00
**Anticipated Contract Start Date:** 1/1/2026
**Anticipated Contract**: 12/31/2030
**Supplier ID:** 0000059697
**Supplier Name**: CHESS Health

**Provide details about the anticipated agreement***: CHESS Health will provide DPH with a Contingency Management Rewards Engine SAAS Software. This CM Rewards Engine is intended to reward participants for drug abstinence. The CM Rewards Engine will track participant urinalysis results and other desirable behaviors, provide incentive management (instant disbursement and automated auditing), integrate directly with EHR/EPIC, provide flexible incentive options (e.g.-physical and digital gift cards, reloadable debit cards), and provide real-time patient-level data availability and instant reporting). The Contingency Management Rewards Engine aligns with the Mayoral initiative to address drug overdoses and substance use disorders.

**Core Initiative Information**

This contract is a "Core Initiative Contract" per Administrative Code Section 21B.2 because it is a "Project Addressing Drug Overdoses and Substance Use Disorders":

- ☐ **Homelessness**, defined as "projects designed to prevent homelessness through the provision of housing subsidies or other services, and projects designed to provide shelter, housing, food, and/or social services to people experiencing homelessness."
- ☒ **Drug Overdoses and Substance Use Disorders**, defined as "projects designed to reduce drug-related deaths and support individuals with substance use disorders (SUDs)."
- ☐ **Mental Health Needs**, defined as "projects designed to support people with mental health disorders."
- ☐ **Integrated Health Needs**, defined as "projects designed to serve people who are at risk of experiencing homelessness due to the potential loss of their shelter, housing, or release from an institution."
- ☐ **Public Safety Hiring**, defined as "projects to support the hiring process for, and/or the recruitment, training, and retention of, police officers, deputy sheriffs, and 911 operators."

Describe why the contract or lease is necessary to support the Core Initiative(s) selected above:
San Francisco has approximately 12 active Contingency Management (CM) programs that need instant disbursement for specified desired health behaviors. These programs have high administrative burdens and the ability to quickly manage and disburse incentives is a common barrier. Data availability is an ongoing issue for Contingency Management (CM) programs and their funders. Funders of CM programs access program-level and participant-level data to monitor CM programs and ensure adherence to CM requirements and compliance with funder expectations. This monitoring data provides a continuous record of incentive distribution for simple compliance checks and auditing. Acquiring a software specifically developed for CM, for use across various city programs, would allow programs to better adhere to CM principles and allow the San Francisco Department of Public Health (SFDPH) to access patient-level data in real time. CHESS Health will be able to export information to EPIC to indicate that patients who already have existing records in EPIC are enrolled in a CM treatment program. CHESS Health will not have access to EPIC patient data records. The patient data entered into the CHESS Health Rewards Engine will be "pushed" or exported into a participant's chart in EPIC to indicate that the individual is enrolled in Contingency Management treatment. CHESS Health's reward engine for contingency

Docusign Envelope ID: 024FC552-FAF9-48D9-8901-D17FEC5D16DC

management will allow the City to work towards reducing drug-related deaths and support individuals with substance use disorders (SUDs).

**Signature**

Department Head Name
Department Head or Designee Name

Signature Signed by: jenny louie for daniel tsai 40CFE25DD8B4464...

Select date
Date 11/24/2025 | 1:27 PM P

BOS-11

State of California • Natural Resources Agency
Gavin Newsom, *Governor*

**DEPARTMENT OF PARKS AND RECREATION**
**OFFICE OF HISTORIC PRESERVATION**
Armando Quintero, *Director*

**Julianne Polanco, State Historic Preservation Officer**
**1725 23rd Street, Suite 100, Sacramento, CA 95816-7100**
**Telephone: (916) 445-7000 FAX: (916) 445-7053**
**calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov**

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2025 DEC 01 AM09:48

November 26, 2025

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

**RE: National Register of Historic Places Nomination for Kinmon Gakuen (AAPI in CA)**

Dear Board of Supervisors:

Pursuant to Federal Regulations 36 CFR Part 60.6(c) I am notifying you that the State Historical Resources Commission (SHRC) at its next meeting intends to consider and take action on the nomination of the above-named property to the National Register of Historic Places (National Register). Details of that meeting are on the enclosed notice. The National Register is the federal government's official list of historic buildings and other cultural resources worthy of preservation. Listing in the National Register provides recognition and assists in preserving California's cultural heritage. If the item is removed from the scheduled agenda, you will be notified by mail.

Local government comments regarding the National Register eligibility of this property are welcomed. Written comments regarding the nomination may be submitted to California State Parks, Attn: Office of Historic Preservation, Julianne Polanco, State Historic Preservation Officer, P.O. Box 94296, Sacramento, California 94296-0001 OR via email to calshpo.shrc@parks.ca.gov. To allow the SHRC adequate time to consider the comments, it is requested that written comments be received by the Office of Historic Preservation seven (7) days in advance of the SHRC's meeting. Written comments received within seven days of the meeting will still be included in the nomination file as sent to the Keeper of the National Register. Interested parties are encouraged to attend the SHRC meeting and present oral testimony.

As of January 1, 1993, all National Register properties are automatically included in the California Register of Historical Resources (California Register) and afforded consideration in accordance with state and local environmental review procedures.

The federal requirements covering the National Register program are to be found in the National Preservation Act of 1966, as amended, and in Federal Regulations 36 CFR Part 60. State law regarding the California Register is in the Public Resources Code, Section 5024. Should you have questions regarding this nomination, or would like a copy of the nomination, please contact the Registration Unit at calshpo.shrc@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Enclosure: Meeting Notice

State of California • Natural Resources Agency

Gavin Newsom, *Governor*

**DEPARTMENT OF PARKS AND RECREATION**
**OFFICE OF HISTORIC PRESERVATION**
**STATE HISTORICAL RESOURCES COMMISSION**

**Julianne Polanco, State Historic Preservation Officer**
**1725 23rd Street, Suite 100, Sacramento, CA 95816-7100**
**Telephone: (916) 445-7000**
**Info.calshpo@parks.ca.gov www.ohp.parks.ca.gov**

**Armando Quintero, Director**

**COMMISSION MEMBERS**
Adam Sriro, Chair
Lee Adams III
Bryan K. Brandes
Janet Hansen
Alan Hess
Neal Payton
René Vellanoweth, PhD

# MEETING NOTICE

*Pursuant to Government Code Section 11133, board members/commissioners of a state body may participate in public meetings remotely. The public may observe, provide public comment during the public comment periods, and otherwise observe remotely in accordance with Bagley-Keene Open Meeting Act.*

**FOR:** State Historical Resources Commission Quarterly Meeting

**DATE:** Friday, February 6, 2026

**TIME:** 9:00 A.M.

**PLACE:** California Natural Resources Agency
Auditorium
715 P St
Sacramento, CA 95814

**The Commission Meeting will also occur through teleconference, available via Zoom through CAL*SPAN. Dial-in access will also be available.**

**Information on how to log in or phone in to this meeting, including web address and passcodes, will be posted no later than January 26, 2026, at http://ohp.parks.ca.gov.**

If you need special accommodations pursuant to the Americans with Disabilities Act, please call Executive Secretary, Monica Newman, at (916) 445-7000. Questions regarding the meeting should be directed to the Registration Unit at (916) 445-7000. In accordance with the *Bagley-Keene Open Meeting Act* an agenda for this meeting will be published on the Office of Historic Preservation website no later than January 26, 2026.

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | A. Wong Resignation Communications |
| **Date:** | Thursday, December 4, 2025 11:45:42 AM |
| **Attachments:** | Resignation from Board of Trustees.pdf<br>Resignation from Children"s Council.pdf |

Hello,

Please see attached communications from Alan Wong, resigning from the City College Board of Trustees and Children's Council of San Francisco.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

**From:** Thongsavat, Adam (MYR)
**To:** Mchugh, Eileen (BOS)
**Subject:** Fw: Resignation from Board of Trustees
**Date:** Monday, December 1, 2025 1:58:34 PM

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Get Outlook for iOS

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**From:** Alan Wong <alankennywong@gmail.com>
**Sent:** Monday, December 1, 2025 12:05:55 AM
**To:** anitamartinez@ccsf.edu <anitamartinez@ccsf.edu>; Chancellor <chancellor@ccsf.edu>
**Cc:** Alan Wong <alanwong@ccsf.edu>; Thongsavat, Adam (MYR) <adam.thongsavat@sfgov.org>
**Subject:** Resignation from Board of Trustees

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

Chancellor Messina and President Martinez,

I am writing to formally submit my resignation from the City College Board of Trustees, effective immediately upon my swearing in and assumption of office as San Francisco District 4 Supervisor.

It has been an honor to serve on this Board and to support the mission of City College of San Francisco. I am grateful for the opportunity to work alongside each of you, and I remain committed to the success of our students, faculty, and staff.

Thank you for your partnership and dedication to City College. I look forward to continuing to support CCSF in my new role.

Sincerely,

--
**Alan Wong**
Board of Trustees
City College of San Francisco
Cell: 415-818-3968
Connect with me on LinkedIn

**From:** Alan Wong
**To:** Calvillo, Angela (BOS)
**Subject:** Fwd: Resignation from Children"s Council
**Date:** Monday, December 1, 2025 8:29:33 PM

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

Begin forwarded message:

**From:** Alan Wong
**Date:** December 1, 2025 at 12:13:39 AM PST
**To:** claudia@childrenscouncil.org, bcarlson@childrenscouncil.org
**Cc:** awong@childrenscouncil.org
**Subject: Resignation from Children's Council**

Dear Barbara and Claudia,

I am writing to formally submit my resignation from my role as Senior Director of Public Policy and Communication at Children's Council of San Francisco, effective immediately upon my swearing in and assumption of office as San Francisco District 4 Supervisor.

It has been an honor to serve in this role and to work alongside both of you in advancing the mission of supporting families, educators, and young children across our city. I am deeply grateful for your guidance, collaboration, and trust.

Thank you for the opportunity to contribute to such meaningful work. I look forward to continuing to support the early childhood community in my new capacity.

Sincerely,

--
**Alan Wong**
Board of Trustees
City College of San Francisco
Cell: 415-818-3968
Connect with me on LinkedIn

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Proposal to Expand County Residency Restrictions Under Jessica"s Law |
| **Date:** | Monday, December 1, 2025 8:28:40 AM |

Hello,

Please see below communication regarding Jessica's Law.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

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**From:** Kylie Orman <orma12422@eduhsd.k12.ca.us>
**Sent:** Sunday, November 30, 2025 2:35 PM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** Proposal to Expand County Residency Restrictions Under Jessica's Law

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

Dear Members of the County Board of Supervisors,

My name is Kylie Orman, and my class partner Alyssa Brady and I are writing as students

in Government class at Oak Ridge High School to propose a county level policy initiative. Particularly, we are asking that the Board of Supervisors consider expanding residency regulations for registered sex offenders under the foundation of Jessica's Law.

Under this proposal the county would broaden the list of protected areas to include community recreation centers, youth sports facilities, after school programs, and large daycare centers. Not only that, we believe establishing a county-funded monitoring program would be beneficial in improving enforcement, including quarterly address verification in partnership with probation officers. Lastly, a development of a public mapping system to increase transparency for residents, and also raising penalties for violations of county residency limits, including higher fines and mandatory relocation if necessary.

It is in our strong opinion that these updates would strengthen local protections for children and families, close existing enforcement gaps, and better align county practices with the intent of Jessica's Law. We appreciate your time and consideration, and welcome any feedback you may have. We hope this proposal can contribute to the ongoing efforts to enhance public safety within El Dorado County.

Sincerely,
Kylie Orman and Alyssa Brady

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Safety in District 4 Consistently Compromised by Closure of the Upper Great Highway |
| **Date:** | Wednesday, November 26, 2025 8:23:24 AM |

Hello,

Please see below communication regarding safety in District 4.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

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**From:** Judi Gorski <judigorski@gmail.com>
**Sent:** Wednesday, November 26, 2025 8:14 AM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; Lurie, Daniel (MYR) <daniel.lurie@sfgov.org>; David A Smith <david_smith@nps.gov>; Ginsburg, Phil (REC) <phil.ginsburg@sfgov.org>
**Subject:** Safety in District 4 Consistently Compromised by Closure of the Upper Great Highway

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

To: Board of Supervisors
Mayor Daniel Lurie
SF Rec and Park Director Phil Ginsburg
GGNRA Superintendent David A. Smith
From: Judi Gorski
Date: Wednesday, November 26, 2025
Re: Safety in District 4 Consistently Compromised by Closure of the Upper Great Highway

Dear City Officials,

I'll keep this short and let the photos speak for themselves. Commercial traffic is continuing to use our neighborhood streets as an alternative route to the Upper Great Highway endangering the District 4 community.



November 25, 2025, 9:14 am, southbound on the Lower Great Highway approaching Taraval

Abuse of the dunes is unmonitored and unrestrained as is depicted by this fire on the dunes near Taraval, 7:23 pm, November 25, 2025.



Please do your jobs and stop these ongoing safety violations in District 4.
Thank you for considering this request.

Sincerely,
Judi Gorski
District 4 Resident

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Scattered Site Housing |
| **Date:** | Tuesday, December 2, 2025 12:14:08 PM |

Hello,

Please see below communication regarding permanent supportive housing.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** Jordan Wasilewski <jodav1026@gmail.com>
**Sent:** Tuesday, December 2, 2025 12:07 PM
**To:** Fielder, Jackie (BOS) <Jackie.Fielder@sfgov.org>; FielderStaff <FielderStaff@sfgov.org>; Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>; Waltonstaff (BOS) <waltonstaff@sfgov.org>; Chen, Chyanne (BOS) <Chyanne.Chen@sfgov.org>; ChenStaff <ChenStaff@sfgov.org>; Chan, Connie (BOS) <connie.chan@sfgov.org>; ChanStaff (BOS) <chanstaff@sfgov.org>; Melgar, Myrna (BOS) <myrna.melgar@sfgov.org>; MelgarStaff (BOS) <melgarstaff@sfgov.org>; WongStaff <WongStaff@sfgov.org>
**Subject:** Scattered Site Housing

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

> sources.

On Friday, the mayor put out a call for scattered site housing opportunities for vehicularly housed folks.

https://www.instagram.com/reel/DRVGNdVkhPM/?igsh=MTc4MmM1YmI2Ng==

I applaud this, but why isn't this the norm for all permanent supportive housing.

I remember over 10 years ago when I was in the Navigation Center on 16th and Mission, the only options were crapshack SROs run by the Tenderloin Housing Clinic. I begged for the ability to get a voucher to go in any other neighborhood but the crime-ridden TL, but was shot down.

The April 2022 investigation by the Chronicle into conditions at PSH SROs showed that San Francisco has an unusually low amount of scattered site housing.

https://www.sfchronicle.com/projects/2022/san-francisco-sros/?rid=43958094

The article states that only 11% of our PSH portfolio is dedicated to scattered site PSH compared to between 30-68% of other West Coast cities.

Furthermore, a follow up investigation in August around evictions in PSH SROs focused on an individual who was evicted for visitor policy violations that would only happen at SROs. Even without explicit sobriety/recovery requirements, there are a lot of people who may not be successful in an SRO downtown who would be more successful in an apartment away from the city center.

I believe that an inquiry needs to be done into scattered site PSH, specifically, why has the city fallen short on this issue, and what can be done to deal with this matter.

Best

-Jordan

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Western Potable EFWS – case# 2023-005928ENV |
| **Date:** | Monday, December 1, 2025 11:55:12 AM |

Hello,

Please see below communication regarding the Western Potable Emergency Firefighting Water System.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** Pinata de Tigre <kuyatheone@gmail.com>
**Sent:** Monday, December 1, 2025 11:49 AM
**To:** Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** Western Potable EFWS – case# 2023-005928ENV

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

To: Lisa Gibson, Environmental Review Officer, SF Planning

lisa.gibson@sfgov.org,

Subject Line: Public Comment in Support of a Full EIR BEFORE approval of SFPUC's proposed Western Potable EFWS – case# 2023-005928ENV

Dear Ms. Gibson:

I am requesting that you approve the **Emergency Firefighting Water System (EFWS) *only*** following a thorough EIR review of the EFWS, in support of John Crabtree's appeal of your decision not to include an Environmental Impact Report.

Over 80% of the deaths and 80% of the property damage after the 1906 San Francisco earthquake resulted from the firestorm (conflagration) that occurred immediately after the earthquake. Shortly afterward, city engineers designed and built the existing **Auxiliary Water Supply System (AWSS)** to prevent post-earthquake fires and conflagrations from ever destroying the city again. AWSS remains the gold-standard for post-earthquake firefighting water supply to this day, but the system was installed only in the districts at the time, which excluded western and southern sections of the city today. For decades, the western and southern neighborhoods have called for expansion of AWSS, including voting for three bonds to fund expansion (2010, 2014 and 2020). But the city never extended the AWSS to these newer districts even as City Hall is pushing to increase development into these unprotected areas of the city.

SFPUC has now offered up "dual-purpose" potable water (drinking water) system that is far too complex, rigid and inadequate, especially regarding water sources. PUC's **Western Potable Emergency Firefighting Water System(EFWS)** must be reviewed and assessed against the **AWSS** standard of protection and the massive environmental impacts of post-earthquake deadly fires.

The inferior proposed EFWS project fails to adequately protect these newer districts. The SFPUC's proposed Western Potable **EFWS** must undergo a full and robust **Environmental Impact Review (EIR)** to protect the lives and property of a significant population of San Francisco. It is unacceptable to bypass CEQA requirements or cut corners to avoid a full EIR when our lives are at stake.

Sincerely,

Paul N Dohrmann

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: please improve the market street bicycle lane in the Castro |
| **Date:** | Wednesday, December 3, 2025 2:17:58 PM |

Hello,

Please see below communication regarding bike lanes on Market Steet.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** Anthony Bishopric <t@anthonybishopric.com>
**Sent:** Wednesday, December 3, 2025 1:43 PM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** please improve the market street bicycle lane in the Castro

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

Supervisor Mandelman and the rest of the board,

My name is Anthony Bishopric and I've been a SF resident for 18 years, 11 of them as a

property owner. I live on 17th street just up from the Castro and Market intersection and bike to work daily. The corridor of Market street between Sanchez and Castro is by far the scariest part of my commute every day. Coming back home I have to navigate many cars parking in the lane, forcing me into terrifying traffic going 30+ mph, and on the way downtown there is no lane all, with many taxis and cars trying to park at Peets or turn right onto 16th.

I have felt especially at risk since the hours moved back one and now have to navigate home in the dark. It is really scary and I feel like I have to make a huge stink every time I get almost cut off on the way home.

Are there any plans to improve bike infrastructure on Market street along this stretch? This is a mostly flat corridor that connects a lot of people, but I often find that it would be safer to head over to Folsom or further just to get to work or home safely. Please prioritize bike safety! We have too many instances of traffic violence in this city.

Thank you,
Anthony

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Crayton, Monique (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Subject: Urgent Request for Oversight: Overcrowding, Unsafe Conditions, and Misuse of 111 Taylor Street Residential Reentry Center |
| **Date:** | Thursday, December 4, 2025 9:03:36 AM |

Hello,

Please see below communication regarding **File No. 250792:**

Hearing to address concerns raised by community members of neglect, abuse, and civil rights violations at the Taylor Street Facility located at 111 Taylor Street, operated by the GEO Group, Inc.; and requesting the GEO Group, Inc., Office of the Public Defender, Adult Probation Department, and California Department of Corrections and Rehabilitation to report.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** JACOB HOROWITZ <jacobahorowitz@gmail.com>
**Sent:** Tuesday, November 25, 2025 10:30 PM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** Subject: Urgent Request for Oversight: Overcrowding, Unsafe Conditions, and Misuse of 111 Taylor Street Residential Reentry Center

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

Dear Members of the San Francisco Board of Supervisors:

I am writing to formally request your immediate oversight and intervention regarding the dangerous and deteriorating living conditions at the **111 Taylor Street Residential Reentry Center**, operated under a federal contract.

I currently live in a room with **six men sharing a single bathroom**. This level of overcrowding violates basic health, safety, and human dignity standards, and contradicts the facility's approved "Group Housing" zoning classification.

Furthermore, the building appears to be operating far beyond its intended scope:

## Key Concerns

### 1. Extreme Overcrowding

- Approximately **200 residents** occupy the building.
- Rooms originally approved for "1–2 occupants" now house **six men each**.

### 2. Carceral Operations

- There are **six mandatory counts per day**, during which all residents must remain **locked inside their rooms** until counts clear.
- This practice is indistinguishable from correctional operations, not Group Housing.

### 3. Insufficient Bathroom Access & Sanitation

- Six men share a single bathroom, causing unsanitary conditions and lack of reasonable hygiene access.

### 4. Inadequate Laundry Capacity

- The small number of laundry machines is insufficient for nearly 200 residents, often resulting in multi-hour wait times and unsanitary conditions.

### 5. Hot Water and Water Pressure Failures

- Many days, showers cannot be completed due to lack of hot water or water pressure.

### 6. No Kitchen & Inadequate Food Conditions

- There is **no kitchen** for residents.
- The only food available are **TV-dinner-style frozen meals**, microwaved on **2–3**

**microwaves** for the entire building.

### 7. Multiple Active City Complaints

Public information shows open DBI complaints regarding:

- Overcrowding
- Illegal change of use
- Unsafe building conditions

These issues demonstrate an urgent need for city-level oversight.

## Request for Action

I respectfully request that the Board:

1. Conduct an oversight hearing into the conditions at 111 Taylor Street,
2. Require GEO Reentry Services and the Federal Bureau of Prisons to provide full transparency regarding occupancy, inspections, and compliance,
3. Coordinate with DBI, Planning, and the City Attorney's Office to determine if zoning and building codes are being violated,
4. Mandate corrective action to ensure humane, safe living conditions for all residents.

Thank you for your time and attention. Many lives are directly affected by the conditions at this facility, and I implore the Board to take immediate action.

Sincerely,

**Jacob Horowitz**
Resident – 111 Taylor Street RRC
San Francisco, CA

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Jalipa, Brent (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Public Comment – Support for Supplemental Budget Item 2 (File 251080) 12/2/2025 |
| **Date:** | Thursday, December 4, 2025 9:07:00 AM |
| **Attachments:** | 16394899528995018057.png<br>5643593872609491825.png<br>18271497119923800441.png<br>680551313875240095.png<br>4855043102770798438.png |

Hello,

Please see below communication regarding **File No. 251080:**

Ordinance appropriating $3,500,000 from the General Reserve to the Mayor's Office of Housing and Community Development to expand access to existing coordinated services for immigration legal defense and community response services to the immigrant community in Fiscal Year (FY) 2025-2026.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** Yesenia Lacayo <yesenia.lacayo@missionaction.org>
**Sent:** Tuesday, December 2, 2025 1:25 PM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** Public Comment – Support for Supplemental Budget Item 2 (File 251080) 12/2/2025

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Dear President Mandelman and Members of the Board of Supervisors,

My name is Yesenia Lacayo, and I am an employee of Mission Action, a community-based organization serving low-income, migrant, immigrant, and refugee communities in San Francisco's Mission District and across the city.

I was born and raised in this community, and I have spent my life working alongside families, workers, and neighbors in the Mission. In my current role and in my past work in the neighborhood, I have seen how critical it is for our community members to have access to housing support, worker and tenant protections, and trusted immigration legal services.

I am writing to express my strong support for the supplemental budget items before the Board today, and in particular **Supplemental Budget Item 2 (File No. 251080)**, which would provide **$3.5 million** to the Mayor's Office of Housing and Community Development to expand coordinated immigrant legal and community response services in FY 2025–2026. These resources are essential for migrant, immigrant, and refugee communities who are navigating crises, displacement, and ongoing threats to their safety and stability.

Through Mission Action's work and our partnerships with the **San Francisco Rapid Response Network (SFRRN)**, the **San Francisco Immigrant Legal & Education Network (SFILEN)**, and the **San Francisco Immigrant Legal Defense Collaborative (SFILDC)**, I see every day how this funding translates into real support: families who stay housed, community members who understand their rights, and people who are not forced to face deportation or legal systems alone.

I respectfully urge you to **vote YES on the supplemental budget, including Item 2 (File 251080)**, so that organizations like Mission Action, and the networks we are part of, can continue providing these critical services to the communities that have built and sustained this city.

Thank you for your time and consideration.

Sincerely,
Yesenia Lacayo
Program Manager, SFILEN – Mission Action
Resident and community member, Mission District, San Francisco

**Yesenia Lacayo**
*Sr SFILEN Program Manager*
(415) 282-6209 x118

MISSION ACTION MISION ACCION

yesenia.lacayo@missionaction.org
https://www.missionaction.org
938 Valencia St., San Francisco, CA 94110

***New Name, Same Mission. Dolores Street Community Services is now Mission Action.***

This message was secured by **Zix®**.

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: 12-2-2025 Superviser meeting |
| **Date:** | Thursday, December 4, 2025 9:14:51 AM |
| **Attachments:** | 12-2-2025 SF Sub.pdf |

Hello,

Please see attached regarding the California Water Resources Control Board.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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-----Original Message-----
From: Maggie Hallahan <maggie@mhpv.net>
Sent: Tuesday, December 02, 2025 2:08 PM
To: AAB, (BOS) <aab@sfgov.org>
Subject: 12-2-2025 Superviser meeting

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

Hello Clerk, I have called in and waiting to give public comment.

Here is my written public Comment.

Best,

Maggie Hallahan

Maggie Hallahan
maggie@mhpv.net
C-415-305-7553

**Public Comment – December 2, 2025**
**Captain Maggie Hallahan – San Francisco Sea Scouts**
Supervisors,
Please see my recent correspondence with the California Water Resources Control Board, the California State Lands Commission, and San Francisco Recreation and Park. These communications outline ongoing concerns about water quality oversight, shoreline access planning, and the safety needs of the growing recreational boating community.
If any members of this Board are interested in learning more about why San Francisco urgently needs:
• a functioning **gas and diesel fuel dock**,
• continued public access to the **boat lift**, and
• reliable infrastructure for **emergency response** on our waterfront,
our coalition of North San Francisco recreational water–use organizations would welcome the opportunity to meet with you.
Thank you for your attention and your continued support for safe, equitable access to our waterfront.
**Captain Maggie Hallahan**
San Francisco Sea Scouts / Makani Maritime Explorers

**Date:** December 1, 2025
**RE:** Request for Statewide Oversight and Consistent Requirements for REC-1 Water Quality Testing for New Recreational Access Areas
California State Water Resources Control Board
c/o California Regional Water Quality Control Board – San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
Hi Samuel Plummer,
Thank you again for your response. I am writing to follow up because I remain unclear about how REC-1 and REC-2 water-quality oversight is being applied at the statewide level—particularly when new recreational water-access areas are approved.
My concern is this: When agencies such as BCDC review applications for new shoreline recreation facilities—kayak launches, stand-up paddleboard access, or other "water park" designs—they do **not** appear to require any evaluation of water quality as part of the approval process. Following your recommendation, I contacted Amy Chastain at the San Francisco Public Utilities Commission to request adding monitoring sites. She informed me that SFPUC currently monitors about 20 shoreline locations required by the Regional Board and that they are not able to add additional REC-1 monitoring stations.
This raises a critical question: **How is the State of California ensuring that families, beginners, and youth have REC-1-quality water at locations where cities, counties, and state agencies themselves are actively building new recreation access points?**
When public agencies design new shoreline access specifically intended for people to *enter the water*, REC-1 water-quality verification seems like a basic public-health

requirement. Yet right now, water-quality protection and recreational access planning appear to be unfolding in separate silos, resulting in significant gaps in oversight.
Across California, other Regional Water Boards have consistently required **site-specific bacteriological testing** before opening new REC-1 access areas. Examples include:

- **Los Angeles River Recreation Zones (Region 4)** — required weekly water-quality testing demonstrating REC-1 compliance before opening to the public.
- **Temescal Creek recreation access (Region 5)** — required site-specific testing because nearby stations were not representative.
- **San Diego Bay and Mission Bay kayak/SUP launches (Region 9)** — required localized monitoring to address marina basin circulation and stormwater variability.

In each case, Regional Boards recognized that new recreation access points introduce new exposure pathways. They concluded that surrogate stations located miles away, or under different hydrologic conditions, could not reliably characterize health risks at the new site.
San Francisco should not be an exception to these well-established statewide practices. If new Rec-1 access is being designed—particularly for youth, families, adaptive paddlers, and beginners—then site-specific water-quality verification is clearly reasonable, and aligns with what other regions already require.
This is why I am seeking clarity on the following:

1. **How is REC-1/REC-2 compliance evaluated when new shoreline recreation areas are approved?**
2. **Which state entity is responsible for ensuring that new access points meet water-quality standards intended for direct water contact?**
3. **How do statewide expectations align across BCDC, municipal departments, and the Regional Water Boards?**

Thank you again for taking the time to discuss these issues. I appreciate any clarification you can provide regarding statewide oversight and consistency. As requested, I have also included photographs documenting public use of the areas for which I am seeking testing and oversight.
Best regards,
**Captain Maggie Hallahan**
SF Sea Scout Leader

**From:** Sam Plummer, P.E. Sam.Plummer@Waterboards.ca.gov
**To:** Maggie Hallahan maggie@mhpv.net
**Cc:** WB-RB2-SFBay-ContactUs; Aidan Cecchetti; Angus Chan
**Subject:** RE: Request to Require Water Quality Testing at SF Marina Accessible Kayak Launch and India Basin Waterfront Park Dock
**Date:** November 12, 2025 – 3:28 PM
Hello Maggie,
As you requested, this email serves as my formal response regarding your request for additional water-quality monitoring at the two locations you identified: the San Francisco Marina accessible kayak launch and the India Basin Waterfront Park dock.

At this time, we do not plan to require the San Francisco Public Utilities Commission (SFPUC) to add monitoring stations at these locations. We do not currently have information indicating that additional monitoring is necessary or required under our Clean Water Act authorities. The existing shoreline monitoring network focuses on higher-risk areas—such as Mission Creek and Islais Creek—or on locations with known bacteria impairments, including Crissy Field, Aquatic Park, and Candlestick Point. Together, these stations provide the data needed for our program's purposes.

SFPUC's publicly available shoreline monitoring results, posted at:
https://webapps.sfpuc.org/sapps/beachesandbay.html
can be used to assess bacteriological conditions following storm events for the locations you referenced.

- **San Francisco Marina:** Crissy Field Beach East (Station 202.4) is expected to closely reflect conditions within the Marina due to strong tidal mixing in the Golden Gate Strait.
- **India Basin:** The Islais Creek station at Islais Landing (Station 320) provides a conservative indicator of conditions in India Basin. Outfall 037, located near India Basin, discharges less frequently and at much lower volumes than the outfalls along Islais Creek, and water in India Basin receives substantially more short-term mixing with the Bay. As a result, bacteria levels in India Basin return to background levels far sooner than in Islais Creek.

As we discussed by phone, the development of new shoreline access points in San Francisco—and the monitoring associated with them—is a coordinated effort among SFPUC, the San Francisco Department of Public Health, and San Francisco Recreation & Parks. I have shared with you the appropriate contact at SFPUC, who can help keep you informed as these efforts move forward. All three agencies are eager to understand the "when and where" of water-recreation uses along the shoreline as these projects develop. Any information you can provide—particularly considering your work with the Sea Scouts—will be helpful to their planning and decision-making.

Best regards,

**Samuel Plummer, P.E.**
Water Resource Control Engineer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612
(510) 622-2485

---

**Your Original Request**

**From:** Maggie Hallahan maggie@mhpv.net
**Sent:** November 6, 2025 – 12:26 PM
**To:** RB2-SFBay-ContactUs@Waterboards.ca.gov
**Cc:** Sam Plummer
**Subject:** Request to Require Water Quality Testing at SF Marina Accessible Kayak Launch and India Basin Waterfront Park Dock

San Francisco Bay Regional Water Quality Control Board – Enforcement Unit:

Please provide an official response to my oversight request. My understanding is that the Board has three weeks to respond once a request is submitted.
Thank you,
Maggie Hallahan

---

**Original October 17, 2025 Letter**
California Regional Water Quality Control Board – San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
**Re: Request for Water Quality Monitoring at San Francisco Marina Accessible Kayak Launch, India Basin Waterfront Park Dock, and Gashouse Cove Marina Small-Boat Launch**
Dear Regional Water Board Staff,
I am requesting that the San Francisco Bay Regional Water Quality Control Board require the City and County of San Francisco to conduct routine REC-1 water-quality monitoring at three high-use public shoreline access locations:
• San Francisco Marina Accessible Kayak Launch
• India Basin Waterfront Park Dock
• Gashouse Cove Marina Small-Boat Launch
These sites are heavily used by the public—including youth, adaptive paddlers, and small-craft recreation programs—who have frequent direct contact with Bay waters.
To protect public health and ensure transparency, I respectfully request that the Board direct the responsible City departments to:
• Implement weekly REC-1 monitoring, modeled on the Aquatic Park Cove program;
• Test for Enterococcus, E. coli, and relevant physical/chemical indicators such as visible sheen, oil and grease, PAHs, metals, turbidity, and pH;
• Promptly publish results online and on-site, especially when thresholds are exceeded; and
• Provide summaries of findings and corrective actions to both the Board and the public when exceedances occur.
These steps are necessary to ensure that people using these new access points are not exposed to unsafe water.
Please let me know what actions the Board is able to take to require this testing, and whether any additional information is needed. I also request a progress update within 30 days.
Thank you for your ongoing work to protect San Francisco Bay and its recreational users.
Sincerely,
**Maggie Hallahan**
San Francisco Resident
Email: maggie@mhpv.net
Phone: 415-305-7553

**FORMAL COMPLAINT AND REQUEST FOR INVESTIGATION**

**To: California State Lands Commission:**

- **Eleni Kounalakis, Lieutenant Governor of California, Chair, California State Lands Commission**
- **Malia M. Cohen, State Controller, Member, California State Lands Commission**
- **Joe Stephenshaw, Director of the Department of Finance, Member, California State Lands Commission**

**Executive Officer / General Manager:**

- **Matthew "Matt" Dumlao, Executive Officer**
- **Jeffrey Plovnick Public Land Management Specialist. California State Lands Commission, 100 Howe Avenue, Suite 100-South, Sacramento, CA 95825-8202**

**Cc:** Bay Conservation and Development Commission (BCDC), California Water Resources Control Board

**From:**
**Captain Maggie Hallahan**
San Francisco Sea Scout Leader
Gashouse Cove Marina Preservation Initiative https://mhpv.net/sfmarina
Email: **SFBay.Maritime.Youth.Advocates@gmail.com**

**Date:** November 6, 2025

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**Subject: Request for Investigation – Mismanagement of State-Granted Public Trust Lands and Revenues at Gashouse Cove Marina (Parcel "R"), San Francisco**

Dear Commissioners and General Manager,

I respectfully request that the California State Lands Commission (CSLC) initiate a **formal investigation** into the City and County of San Francisco's management of state-granted public trust lands and revenues at **Gashouse Cove Marina (also known as East Harbor, Parcel "R")**. These lands are held in trust under *Chapter 437, Statutes of 1935* and its subsequent amendments in *1963* and *1970*, which strictly limit their use to aquatic and recreational purposes.

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**I. Background and Legal Framework**

The legislative record establishes clear and binding conditions:

- **Chapter 437 (1935):** Granted the property to San Francisco exclusively for aquatic, recreational, boulevard, park, and playground purposes, expressly prohibiting any lease or use for pecuniary profit.
- **Chapter 941 (1963):** Reaffirmed these restrictions while extending allowable leases to 20 years.

- **Chapter 670 (1970):** Further extended lease terms to 40 years and reiterated that the lands must continue to be used only for aquatic and recreational purposes.

These statutes collectively establish a **continuing Public Trust obligation** binding the City and County of San Francisco as trustee for Gashouse Cove and the Marina Small Craft Harbor.

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**II. Violations of Public Trust Use**

The City's 2025 redevelopment proposal for Gashouse Cove Marina seeks to:

- Remove the **fuel dock**,
- Eliminate over **200 working-class boat slips**, and
- Convert the functioning harbor into a "**shallow basin**."

These proposed actions would effectively terminate traditional maritime access and aquatic use—**violating both the statutory Public Trust and the City's fiduciary duty as trustee**.

The proposal contradicts the trust's explicit purpose: maintaining the property for **aquatic, navigational, and recreational use**, as reaffirmed in multiple state statutes and City legal opinions.

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**III. Failure to Maintain the Marina Yacht Harbor Fund as a Separate, Transparent Public Trust Account**

The City's persistent failure to maintain and report a separate **Marina Yacht Harbor Fund** represents a serious breach of its fiduciary obligations.

Under the **Public Trust Doctrine** and **City Attorney Opinion No. 87-17 (1987)**, all revenues from the Marina Small Craft Harbor must be held in a **dedicated Harbor Fund** and used exclusively for aquatic and recreational purposes.

For more than a decade, the City has:

- Failed to publish annual, publicly accessible Harbor Fund financial reports;
- Pooled harbor revenues with the San Francisco Recreation and Park Department (SFRPD) general operating funds, obscuring the expenditure of trust revenues; and
- Proposed changes (Controller Budget Form 1A, FY 2025) that would shift the Harbor Fund to a **"self-sustaining enterprise model"**—a structure potentially paving the way for privatization or for-profit management.

This lack of transparency violates both the **fiduciary duties** under the 1935–1970 trust statutes and the City Attorney's 1987 opinion, which states:

"Revenues from the Marina Small Craft Harbor must be devoted exclusively to water-oriented recreational purposes and may not be diverted to unrelated City operations."

Immediate **state audit and oversight** are necessary to restore compliance and ensure public trust integrity.

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**IV. Lack of Substantiated Justification**

At the **January 2025 BCDC meeting**, SFRPD asserted that environmental regulators required the removal of the fuel dock. However, the **California Water Resources Control Board** confirmed that **PG&E's cleanup plan does not mandate fuel dock removal.**

Furthermore, the City provided no **verified technical, environmental, or financial data** to support its claim that retaining the fuel dock would cost $20–25 million. This absence of substantiation calls into question the basis for such a drastic and irreversible alteration of a state-trust asset.

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**V. Procedural Deficiencies and Omitted Analyses**

SFRPD continues to rely on an outdated **2006 permit** and a limited **2022 feasibility study** that failed to consider critical environmental and safety issues, including:

- The **Laguna Street sewage outfall**, which discharges approximately **468 million gallons annually** into the Cove;
- **Electric shock drowning hazards** from marina power systems; and
- The lack of design alternatives preserving the **fuel dock and marine emergency access**.

These omissions constitute serious procedural deficiencies and render any current environmental review incomplete.

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**VI. Breach of Fiduciary Duty and Financial Mismanagement**

**A. City Attorney's Opinion No. 87-17 (August 18, 1987)**

Authored by City Attorney Louise H. Renne and Deputies Burk E. Delventhal and Rose Mikosvky for Mayor Dianne Feinstein, this opinion concludes:

"The City and County of San Francisco may not use monies generated from the Marina Small Craft Harbor for other than water-oriented recreational purposes."

It further states that revenues are restricted by both the **State's loan agreement** and the **Public Trust Doctrine**, and may not fund general City overhead or unrelated operations.

**B. Fiscal Policies and Budget Records**

Public documents demonstrate a **pattern of financial diversion**:

- **Board of Supervisors Report (2006):** Showed Harbor revenues combined with other SFRPD funds, violating segregation requirements.
- **Controller's Budget Form 1A (FY 2025):** Proposes transitioning the Marina Harbor Fund into a **self-sustaining enterprise model**, inconsistent with trust restrictions.
- **Budget and Legislative Analyst Report (Jan. 26, 2024):** Promotes fee increases and paid parking to make the Marina "financially independent," while ignoring the **$26.5 million state loan (2008)** and its $1.5 million annual repayment obligation now subsidized by taxpayers.

These actions have produced **the highest berth fees in Northern California**, effectively excluding middle-income boaters and shifting the harbor's public benefit away from equitable recreation.

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**VII. Requested Commission Actions**

I respectfully request that the **California State Lands Commission**:

1. **Conduct a formal investigation** into whether San Francisco's management of Gashouse Cove Marina violates the Public Trust Grant (Ch. 437 – 1935; Ch. 941 – 1963; Ch. 670 – 1970) and **City Attorney Opinion No. 87-17**.

2. **Audit the Marina Yacht Harbor Fund** to determine if revenues have been diverted from aquatic purposes, and mandate **annual public reporting** of harbor revenues and expenditures.
3. **Review the 2025 Gashouse Cove Redevelopment Proposal** for compliance with Public Trust law, CSLC oversight, and environmental standards.
4. **Consider reversion of Parcel "R"** (Gashouse Cove Marina) to **direct State management** or a governance model similar to **SF South Beach Harbor** under Port of San Francisco oversight.

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**VIII. Conclusion**

The legislative acts, legal opinions, and financial records establish a consistent pattern: The **City of San Francisco is not honoring its Public Trust obligations.**

By converting a functioning marina into a passive basin and diverting Harbor Fund revenues into general accounts, the City is violating both the **intent and letter of California law**.

I urge the **California State Lands Commission** to act swiftly to safeguard Gashouse Cove Marina as a **vital aquatic, recreational, and working-waterfront resource** for all Californians.

Thank you for your attention and commitment to protecting this historic public trust property. I am available to provide documentation, testimony, or clarification upon request.

Respectfully submitted,

**Captain Maggie Hallahan**
San Francisco Sea Scout Leader
Gashouse Cove Marina Preservation Initiative https://mhpv.net/sfmarina
Email: **SFBay.Maritime.Youth.Advocates@gmail.com**

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**Supporting Documents (List A1)**

1. Chapter 437 (1935) – Granting tidelands for aquatic and recreational purposes.
2. Chapter 941 (1963) – Amendment extending lease powers to 20 years.
3. Chapter 670 (1970) – Amendment extending lease powers to 40 years.
4. City Attorney Opinion No. 87-17 (Aug. 18, 1987).
5. San Francisco Board of Supervisors (2006) – Marina Yacht Harbor Fund Overhead Allocation.
6. Controller's Office (FY 2025) – Budget Form 1A.
7. Budget and Legislative Analyst Report (Jan. 26, 2024).
8. BCDC Meeting Transcript (Jan. 2025).
9. California Water Resources Control Board Correspondence – PG&E cleanup confirmation.

# CHAPTER 670

*An act to amend Section 2 of Chapter 1333 of the Statutes of 1968, and to amend Section 1 of Chapter 437 of the Statutes of 1935, relating to San Francisco lands.*

[Approved by Governor August 12, 1970 Filed with Secretary of State August 12, 1970.]

*The people of the State of California do enact as follows:*

SECTION 1. Section 2 of Chapter 1333 of the Statutes of 1968 is amended to read:

Sec. 2. The Director of Finance is hereby authorized to negotiate with the City and County of San Francisco for the transfer, in conformity with the provisions of this act, to the City and County of San Francisco, a municipal corporation of the State of California, or to its successor, in trust for purposes of commerce, navigation, and fisheries and subject to the terms and conditions specified in this act, all of the right, title and interest held by the State of California and acquired by virtue of its sovereignty or otherwise, in and to the real property located in the City and County of San Francisco and presently under the jurisdiction and control of the San Francisco Port Authority, together with all improvements, rights, privileges, easements and appurtenances connected therewith or in anywise appertaining thereto, and any and all personal property of every kind and description owned or controlled by the State of California and used in connection with the operation and maintenance of San Francisco Harbor and including any deposits of funds held by or for the San Francisco Port Authority; excepting and reserving unto the State of California all subsurface mineral deposits, including oil and gas deposits, together with the right of ingress and egress on the properties conveyed to the City and County of San Francisco for exploration, drilling and extraction of such mineral, oil and gas deposits, subject, however, to the provision that during the term of any lease, franchise, permit or license of such property pursuant to Section 3 of this act, such mineral rights herein reserved to the State of California, including the right of ingress and egress, shall not be exercised so as to disturb or otherwise interfere with the leasehold estate or the rights or encumbrances to which any such lease, franchise, permit or license may be subject; provided, however, that any lease, franchise, permit or license of

such property pursuant to Section 3 of this act must contain a provision specifying at least one point from which and the manner in which the right of ingress or egress to said subsurface deposits may be exercised, which said point or points may be outside the area of the leasehold, franchise, permit or license, providing the point or points are adequate to permit the rights reserved to the state to be exercised; and also reserving to the people of the State of California the right to hunt and fish in and over the waters of San Francisco Harbor. The negotiations shall be concluded by October 21, 1968, unless such time is extended by mutual agreement. In lieu of any survey which might otherwise be required by law, within three years after the effective date of this act, the State Lands Commission shall, at the cost of the Port Commission of the City and County of San Francisco, provide a description of the transferred lands, using such references and designations as are commonly known place names and geographical and political boundaries, and surveying and monumenting only when known designations or points of reference are not available. The description so prepared and a plat thereof shall thereafter be recorded by the State Lands Commission in the office of the Recorder of the City and County of San Francisco. This act shall not apply to any property or interest in property, whether real or personal, owned by or under the jurisdiction or control of the Department of Public Works, Division of Highways, Division of Bay Toll Crossings, or the California Toll Bridge Authority. All that property described in Section 1770 of the Harbors and Navigation Code and transferred to the City and County of San Francisco by this act shall remain subject to any requirements of the Department of Public Works, Division of Bay Toll Crossings, Division of Highways, or the California Toll Bridge Authority for future right-of-way, or easement, or material for the construction, location, realignment, expansion and maintenance of bridges, highways or other transportation facilities without compensation to the City and County of San Francisco, except that in the event improvements, betterments or structures have been placed upon the property transferred, compensation shall be made to the City and County of San Francisco, and to any third party entitled thereto, for the value of the improvements, betterments, or structures taken, and except property that was originally acquired for valuable consideration, in which case compensation shall be made to the City and County of San Francisco. The Director of Finance shall be assisted in such negotiations by the Secretary for Agriculture and Services and the San Francisco Port Authority.

SEC. 2. Section 1 of Chapter 437 of the Statutes of 1935 is amended to read:

Section 1. There is hereby granted to the City and County of San Francisco, a municipal corporation of the State of California, all the right, title and interest of the State of California held by said state by reason of its sovereign power,

in and to the following described parcel of land situate in the City and County of San Francisco, State of California, and described as follows, to wit:

Beginning at a point on the westerly line of Lyon Street, if produced in a northerly direction, said line being the easterly boundary of the Presidio U. S. Military Reservation, distant thereon 609.62 feet northerly from the northerly line of Marina Boulevard and running thence easterly in a straight line, and parallel with the northerly line of Marina Boulevard, 3648 feet 9 inches, more or less, to the westerly line of Webster Street if produced northerly; thence northerly along said line of Webster Street produced 1000 feet; thence at a right angle westerly 3648 feet 9 inches, more or less, to the westerly line of Lyon Street produced, and thence southerly along said line of Lyon Street produced 1000 feet, more or less, to the point of beginning.

Reserving, however, unto the State of California all rents due or to become due under the terms and conditions of any existing lease or leases of all, or any part of the hereinabove described real property heretofore entered into by the State of California, or by any board or commission of the State of California, and which said rent is payable to the State of California or to any board or commission of the State of California.

All of the above described real property hereby granted shall be forever held by said City and County of San Francisco and by its successors in trust for the uses and purposes and upon the express conditions following, to wit: said real property shall be used solely for aquatic, recreational, boulevard, park and playground purposes.

Provided, however, that said City and County of San Francisco shall have power to set apart and assign, or lease, any of said property hereinbefore described for a period not to exceed 40 years, to any corporation, club or association organized for the purpose of developing and promoting aquatic sport; provided, that no part of said property shall be set apart and assigned, or leased to any corporation, club or association the object of which is pecuniary profit.

# Chapter 437 - Land Grant to San Francisco

CHAPTER 437
An act granting to the City and County of San Francisco certain lands of the State of California located in the City and County of San Francisco upon certain trusts and conditions.

[Approved by the Governor July 11, 1935. In effect September 15, 1935.]

The people of the State of California do enact as follows:

SECTION 1. There is hereby granted to the City and County of San Francisco, a municipal corporation of the State of California, all the right, title and interest of the State of California, held by said State by reason of its sovereign power, in and to the following described parcel of land situate in the City and County of San Francisco, State of California, and described as follows:

Beginning at a point on the westerly line of Lyon Street, if produced in a northerly direction, said line being the easterly boundary of the Presidio U. S. Military Reservation, distant thereon 609.62 feet northerly from the northerly line of Marina Boulevard and running thence easterly in a straight line, and parallel with the northerly line of Marina Boulevard, 3648 feet 9 inches, more or less, to the westerly line of Webster Street if produced northerly; thence northerly along said line of Webster Street produced 1000 feet; thence at a right angle westerly 3648 feet 9 inches, more or less, to the westerly line of Lyon Street produced, and thence southerly along said line of Lyon Street produced 1000 feet, more or less, to the point of beginning.

Reserving, however, unto the State of California all rents due or to become due under the terms and conditions of any existing lease or leases of all, or any part of the hereinabove described real property heretofore entered into by the State of California, or by any board or commission of the State of California, and which said rent is payable to the State of California or to any board or commission of the State of California.

Provided, however, that said City and County of San Francisco shall have power to set apart and assign, or lease, any of said property hereinbefore described for a period not to exceed ten years, to any corporation, club or association organized for the purpose of developing and promoting aquatic sport; provided, that no part of said property shall be set apart and assigned, or leased to any corporation, club or association the object of which is pecuniary profit.

# CHAPTER 437.

*An act granting to the City and County of San Francisco certain lands of the State of California located in the City and County of San Francisco upon certain trusts and conditions.*

[Approved by the Governor July 11, 1935. In effect September 15, 1935.]

*The people of the State of California do enact as follows:*

Lands granted to San Francisco.

SECTION 1. There is hereby granted to the City and County of San Francisco, a municipal corporation of the State of California, all the right, title and interest of the State of California,

held by said State by reason of its sovereign power, in and to the following described parcel of land situate in the City and County of San Francisco, State of California, and described as follows, to wit:

Description

Beginning at a point on the westerly line of Lyon Street, if produced in a northerly direction, said line being the easterly boundary of the Presidio U. S. Military Reservation, distant thereon 609.62 feet northerly from the northerly line of Marina Boulevard and running thence easterly in a straight line, and parallel with the northerly line of Marina Boulevard, 3648 feet 9 inches, more or less, to the westerly line of Webster Street if produced northerly; thence northerly along said line of Webster Street produced 1000 feet; thence at a right angle westerly 3648 feet 9 inches, more or less, to the westerly line of Lyon Street produced, and thence southerly along said line of Lyon Street produced 1000 feet, more or less, to the point of beginning.

Reservation of rents to State.

Reserving, however, unto the State of California all rents due or to become due under the terms and conditions of any existing lease or leases of all, or any part of the hereinabove described real property heretofore entered into by the State of California, or by any board or commission of the State of California, and which said rent is payable to the State of California or to any board or commission of the State of California.

Uses and purposes.

All of the above described real property hereby granted shall be forever held by said City and County of San Francisco and by its successors in trust for the uses and purposes and upon the express conditions following, to wit: said real property shall be used solely for aquatic, recreational, boulevard, park and playground purposes.

Provided, however, that said City and County of San Francisco shall have power to set apart and assign, or lease, any of said property hereinbefore described for a period not to exceed ten years, to any corporation, club or association organized for the purpose of developing and promoting aquatic sport; provided, that no part of said property shall be set apart and assigned, or leased to any corporation, club or association the object of which is pecuniary profit.

Louise H. Renne,
City Attorney

OPINION NO. 87 - 17

August 18, 1987

SUBJECT: MARINA SMALL CRAFT HARBOR REVENUES

REQUESTED BY: THE HONORABLE DIANNE FEINSTEIN
Mayor

PREPARED BY: BURK E. DELVENTHAL
ROSE MIKSOVSKY
Deputy City Attorneys

## QUESTION PRESENTED

May the City and County of San Francisco use monies generated from the Marina Small Craft Harbor for other than water-oriented purposes?

## CONCLUSION

No. However, there is a broad range of permissible uses within the statutorily imposed water-oriented limitations on revenue generated from the Marina Small Craft Harbor. These uses are further restricted by the terms of a loan agreement between the State of California and the City and County of San Francisco.

## ANALYSIS

You have asked this office to advise you whether the City and County of San Francisco may use monies generated from the Marina Small Craft Harbor (Harbor) for other than water-oriented recreational purposes. To answer this question we must determine whether there are limitations on the use of the lands on which the Harbor is located or on the revenues generated from the Harbor. In responding to your inquiry, we emphasize that the revenues from the Harbor are generated by a recreational facility and must be devoted to recreational uses. (See, San Francisco Charter §§3.550, 3.552, and 6.200 et seq.) Therefore, the initial determination of how these monies shall be spent must be made by the Recreation and Park Commission through the customary budgetary process as provided in the Charter. (Ibid.)

The Harbor is located on tidelands, and therefore impressed with a public trust. (See, City of Berkeley v. Superior Court (1980) 26 Cal.3d 515, 521, cert. denied, 449 U.S. 840.) Traditionally, the public trust purposes were characterized as fishing, navigation and commerce. (Marks v.

Whitney (1971) 6 Cal.3d 251, 259-260.) Courts now recognize that the permissible range of public uses is far broader, including the right to hunt, bathe or swim, and the right to preserve the tidelands in their natural state as ecological units for scientific study. (Ibid.)

San Francisco obtained the lands on which the Harbor is located in trust from the State of California. (See, State Lands Commission, A Report on the Use, Development, and Administration of Granted Tidelands and Submerged Lands (Report), p. 43 (1976).) As trustee, the City must use the lands for activities that promote statewide, rather than local, purposes. (Mallon v. City of Long Beach (1955) 44 Cal. 2d 199, 209.) Under the specific limitations imposed by the state in the granting conveyance, San Francisco may only use the property on which the Harbor is situated for aquatic, recreational, boulevard, park and playground purposes.1/

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1/ California granted San Francisco title to the Harbor in Chapter 437 of the Statutes of 1935 which states in relevant part:

> "All of the above described real property hereby granted shall be forever held by said City and County of San Francisco and by its successors in trust for the uses and purposes and upon the express conditions following, to wit: said real property shall be used solely for aquatic, recreational, boulevard, park and playground purposes.
>
> Provided, however, that said City and County of San Francisco shall have power to set apart and assign, or lease, any of said property hereinbefore described for a period not to exceed ten years, to any corporation, club or association organized for the purpose of developing and promoting aquatic sport; provided, that no part of said property shall be set apart and assigned, or leased to any corporation, club or association the object of which is pecuniary profit."

This statute was amended twice, extending the period for which an assignment or lease could be made to twenty (20) years (Statutes of 1963, Chapter 1298) and later to forty (40) years (Statutes of 1970, Chapter 670).

These restrictions on the public trust lands also apply to revenues generated from the lands. (See, State of California ex rel. State Lands Commission v. County of Orange (1982) 134 Cal.App.3d 20; Marlon at 209; Report at 44 and 45.) In addition, the City may only use the revenues for services, purposes and improvements located on or related to the granted lands. (See, National Audubon Society v. Superior Court (1983) 33 Cal. 3d 419, 440 cert. denied 464 U.S. 977; County of Orange at 25; Sax, The Public Trust Doctrine in Natural Resource Law: Effective Judicial Intervention, 68 Michigan L.Rev. 472, 477, 536 (1970).)

We next consider additional limitations imposed by a loan agreement with the State of California.

In 1974 the City and County of San Francisco entered into a loan agreement with the State of California. The loan was for a construction project at the Harbor. The loan agreement limits the City's use of Harbor revenues to loan payments, advance loan repayment, operating and maintenance expenses and reserve funds until the loan repayment schedule ends on August 1, 2007.2/ Operating and maintenance expenses mean labor and materials for the operation of the Harbor and the indirect expenses of City administration up to 15% of the revenues.

Should the City elect to repay the loan in advance, the City would then be able to develop alternative uses for expenditures of the revenues within the limitations of the

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2/ Paragraph 13 of the loan states:

> Any surplus of funds arising from operation of PROJECT remaining after deduction from gross revenues of funds necessary for repayments to DEPARTMENT, operating and maintenance expenses and reserve funds as herein provided, shall be retained by APPLICANT and may be invested in reasonably liquid assets. No transfer of such funds other than for advance repayment of the loan to DEPARTMENT shall be made to APPLICANT so long as any principal or interest thereon remains unpaid. Whenever such funds exceed TWO (2) years PROJECT operating and loan repayment expenses as indicated in EXHIBIT A, all surpluses in excess of this amount may be required by DEPARTMENT to be used for advance repayment of the loan.

tideland trust doctrine and the granting statute. For example, the revenues could be used to fund a class on marine biology or boating at the Harbor, to fund ecological study at the Harbor, or to finance any water-oriented recreational activities at the Harbor, to repair the breakwater or to repair streetlights at the Harbor. While the matter is not free from doubt, we are of the view that Harbor revenues may also be used to pay the Harbor's pro rata share of capital costs of sewer construction and operation based upon the benefits the Harbor receives from such construction and operation. The aforementioned list is merely illustrative.

In any future loan negotiations for future projects at the Harbor, the City may wish to preserve its options to make alternative uses of surplus revenues.

In summary, an existing outstanding loan from the state restricts the City's use of these revenues to loan payments and operation and maintenance of the Harbor. Whether to accelerate the loan payments in order to pursue other permissible uses involves economic and public policy questions. Were the City to accelerate the repayment of the loan, then Harbor revenues could be used for purposes consistent with the limitations of the tideland trust doctrine and the granting statute. Within these limitations, however, are a broad range of permissible uses. Past practices regarding the use of Harbor revenues have not exhausted all the available options.

Very truly yours,

LOUISE H. RENNE
City Attorney

BURK E. DELVENTHAL
Deputy City Attorney

ROSE MIKSOVSKY
Deputy City Attorney

APPROVED:

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3. The Marina Yacht Harbor F
https://sfbos.org/3-marina-yacht-harbor-fund-overhead-allocation
Sign up sheet for... MHPV — GHC SF Sea Scouts Ma... SFRP Plan Endang... Sign in to your acc... GHC list of people... SF_Investigative_... Summer 2025 - G... Thank you ( Mahal... fims.historicalinfo.... #35 - The boy sco...

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# 3. The Marina Yacht Harbor Fund Overhead Allocation

- **The Recreation and Park Department allocates overhead costs to the Marina Yacht Harbor Fund through overhead rates charged by the Department's Structural Maintenance and Capital Divisions to Marina Yacht Harbor Fund projects. The Department also allocates a percentage of the Department's administrative costs to the Marina Yacht Harbor Fund in each year's budget.**

- **The Budget Analyst's 2006 Recreation and Park Department management audit found that the Recreation and Park Department was not adjusting for the difference between administrative expenditure recoveries from the Department's divisions and funds, and actual administrative expenditures. The Recreation and Park Department began adjusting for differences in paid time off recoveries and expenses, included in the Structural Maintenance and Capital Divisions' overhead rates, in FY 2006-2007, but has not adjusted for the difference in expenditure recoveries and actual expenditures for department-wide administrative expenditures allocated to each of the Department's divisions or funds. As a result, the Department has over-recovered approximately $1.1 million in administrative expenditures. According to the Department, the proposed FY 2008-2009 budget will adjust for the prior years' over-recoveries for administrative expenditures.**

- **The Recreation and Park Department allocates electricity charges through the cost allocation plan. However, the cost allocation plan, which allocates costs based on the number of budgeted positions in each of the Department's divisions or funds, is not an accurate measure of electricity use. Further, from FY 2003-2004 through FY 2005-2006, the Recreation and Park Department allocated electricity and waste disposal costs to the Marina Yacht Harbor through the cost allocation plan as well as directly charging these costs to the Marina Yacht Harbor. Consequently, the Marina Yacht Harbor overpaid by $49,207 for these costs during those years. In FY 2006-2007 and FY 2007-2008, the Recreation and Park Department has allocated electricity costs through the cost allocation plan rather than charging for electricity based on actual use. The Department has undercharged the Marina Yacht Harbor for electricity use in FY 2006-2007 by $106,792, resulting in total net undercharges of $57,585 from FY 2003-2004 through FY 2006-2007.**

**The Recreation and Park Department's Cost Allocation Plan**

In FY 2002-2003 the Recreation and Park Department recast its operating budget to better align costs to programs, and developed a cost allocation plan to (a) allocate department-wide and division administrative costs to funding sources and programs within the Department, and (b) set overhead rates for Department employees who charge to capital and facilities maintenance projects. The goal of the cost allocation plan is to:

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**Expenditures**

**FY 2003-2004 to FY 2006-2007**

| | FY 2003-2004 | Cumulative Surplus/ (Deficit) as of FY 2004-2005 | Cumulative Surplus/ (Deficit) as of FY 2005-2006 | Cumulative Surplus/ (Deficit) as of FY 2006-2007 |
|---|---|---|---|---|
| Administrative Services Division | $769,500 | $1,052,959 | $703,272 | $1,149,767 |

Source: Recreation and Park Department

According to the Recreation and Park Department Director of Administrative Services, the Department will adjust the administrative expenditure allocation to the Departments' divisions and funds in the FY 2008-2009 budget to account for the cumulative surplus. The Recreation and Park Department needs to adjust for the difference between expenditure recoveries and actual administrative expenditures during the course of the year to ensure that the Department does not over- or under-recover for the Administrative Services Division's costs.

Further, in FY 2007-2008 the Structural Maintenance Division has a cumulative surplus and the Capital Division has a cumulative deficit in expenditure recoveries for administrative costs, as shown in Table 3.4.

**Table 3.4**

**Cumulative Surplus/ (Deficit) in the Structural Maintenance and Capital Division's Expenditure Recoveries for Compared to Actual Expenditures for Administrative Costs**

**FY 2003-2004 to FY 2006-2007**

| | FY 2003-2004 | Cumulative Surplus/ (Deficit) as of FY 2004-2005 | Cumulative Surplus/ (Deficit) as of FY 2005-2006 | Cumulative Surplus/ (Deficit) as of FY 2006-2007 |
|---|---|---|---|---|
| Structural Maintenance Division | $62,322 | $81,689 | $263,286 | $524,057 |
| Capital Division | (32,611) | (323,168) | (43,698) | (100,829) |
| Total | $29,711 | ($241,479) | $219,588 | $423,228 |

Source: Recreation and Park Department

The Recreation and Park Department needs to adjust the overhead rates charged to Department projects by the Structural Maintenance and Capital Divisions during the course of the year to ensure that each division does not over- or under-recover for the division's costs from each of the Department's divisions and funds.

**Directly Charging Electricity Costs to Each Division**

The Recreation and Park Department allocates electricity charges through the cost allocation plan. However, the cost allocation plan, which allocates costs based on the number of budgeted positions in each of the Department's divisions or funds, is not an accurate measure of electricity use.

Further, from FY 2003-2004 through FY 2005-2006, the Recreation and Park Department allocated electricity and waste disposal costs to the Marina Yacht Harbor through the cost allocation plan as well as directly charging these costs to the Marina Yacht Harbor. Consequently, the Marina Yacht Harbor overpaid by $49,207 for these costs during those years. In FY 2006-2007 and FY 2007-2008, the Recreation and Park Department has allocated electricity costs through the cost allocation plan. As shown in Table 3.5, the Department has undercharged for the Marina Yacht Harbor for electricity use in FY 2006-2007.

**Table 3.5**

**Electricity and Waste Disposal Direct Charges to the Marina Yacht Harbor and Allocated Charges through the Cost Allocation Plan**

**FY 2003-2004 through FY 2006-2007**

| | FY 2003-2004 | FY 2004-2005 | FY 2005-2006 | Total FY 2003-2004 through FY 2005-2006 | FY 2006-2007 |
|---|---|---|---|---|---|
| **Marina Yacht Harbor Direct Charges** | | | | | |
| Electricity | $147,063 | $131,714 | $134,238 | $413,015 | $0 |
| Waste Disposal | 78,723 | 78,723 | 80,077 | 237,523 | 0 |
| Total | 225,786 | 210,437 | 214,315 | 650,538 | 0 |
| **Cost Allocation Plan Total Charges** | | | | | |
| Electricity | 1,156,666 | 1,061,548 | 1,464,518 | - | 2,306,155 |
| Waste Disposal | 206,872 | 206,872 | 213,078 | - | 0 |
| Total | 1,363,538 | 1,268,420 | 1,677,596 | - | 2,306,155 |
| Marina Yacht Harbor Percent Allocation from Cost Allocation Plan | 1.16% | 1.09% | 1.16% | - | 1.06% |

# BUDGET FORM 1A: Summary of Major Changes

**BUDGET FORM 1A: Summary of Major Changes** — **FY 2024-25 and FY 2025-26**

DEPARTMENT: REC Recreation And Park

| | Major Changes | Department Response to Major Changes |
|---|---|---|
| **Summary** | What major changes is the department proposing? Clearly describe each change, including the fiscal impact of the proposal. Alternatively, you may submit a 1-2 page memo with your budget submission summarizing the major changes. | Below are the Department's budget strategies to balance the budget:<br>1. $1M in midyear budget cuts implemented on an ongoing basis including the elimination of six vacant positions, an addback, and work order.<br>2. Divisions are submitting 10% budget reductions,<br>Defund vacant positions / Increase attrition savings,<br>Reduce class size of Apprenticeship program,<br>Reduce Materials and Supplies budget,<br>Reduce Non-Personnel Services budget,<br>Reduce Temporary Salary spending.<br>3. Consider instituting a vehicle leasing pilot program with a new contractor.<br>4. Consider downsizing or shutting down the permits office at 49 South Van Ness.<br>5. Identify cost savings in the DT Workorder or other tech expenses.<br>6. Develop a recreation programming cost recovery goal. Develop legislation and change fees as needed to meet this goal.<br>7. Analyze scholarships to ensure that they are fairly allocated and fully utilized. Consider a per person maximum.<br>8. Consider charging fees for athletics fields for youth.<br>9. Consider implementing tennis reservation and athletic reservation admin fees.<br>10. Review drop-in fees at Recreation sites.<br>11. Work with DCYF to explore funding programming in clubhouses.<br>12. Incorporate golf course maintenance agreements at Sharp and Lincoln Golf Courses.<br>13. Move the Marina Yacht Harbor, Golf Courses, and Camp Mather to a self-sustaining enterprise model.<br>14. Consider paid parking in city parks.<br>15. Contract in Park Stop program in partnership with HSA to reduce costs.<br>16. Revise agreement with the San Francisco Botanical Gardens.<br>17. Offset 200% water increase from PUC with operations support on park properties co-managed by RPD and PUC. |
| **General Fu Target** | | |
| **Positions** | | |
| **Expenditur** | | |
| **Revenues** | | |
| **Legislation** | Is the department seeking to submit any legislation with the budget? Does the department's budget assume any revenues/expenditures that require a legislative change? | Yes, Rec and Park is seeking to submit legislation with the budget. The Department assumed revenue changes in its proposed budget that require legislative changes. |

**BUDGET FORM 1A: Summary of Major Changes**

DEPARTMENT: REC Recreation And Park

| | Major Changes | Department Response to Major Changes |
|---|---|---|
| **Summary** | What major changes is the department proposing? Clearly describe each change, including the fiscal impact of the proposal. Alternatively, you may submit a 1-2 page memo with your budget submission summarizing the major changes. | Below are the Department's budget strategies to balance the budget:<br>1. $1M in midyear budget cuts implemented on an ongoing basis including the elimination of six vacant positions, an addb<br>2. Divisions are submitting 10% budget reductions,<br>Defund vacant positions / Increase attrition savings,<br>Reduce class size of Apprenticeship program,<br>Reduce Materials and Supplies budget,<br>Reduce Non-Personnel Services budget,<br>Reduce Temporary Salary spending.<br>3. Consider instituting a vehicle leasing pilot program with a new contractor.<br>4. Consider downsizing or shutting down the permits office at 49 South Van Ness.<br>5. Identify cost savings in the DT Workorder or other tech expenses.<br>6. Develop a recreation programming cost recovery goal. Develop legislation and change fees as needed to meet this goa<br>7. Analyze scholarships to ensure that they are fairly allocated and fully utilized. Consider a per person maximum.<br>8. Consider charging fees for athletics fields for youth.<br>9. Consider implementing tennis reservation and athletic reservation admin fees.<br>10. Review drop-in fees at Recreation sites.<br>11. Work with DCYF to explore funding programming in clubhouses.<br>12. Incorporate golf course maintenance agreements at Sharp and Lincoln Golf Courses.<br>13. Move the Marina Yacht Harbor, Golf Courses, and Camp Mather to a self-sustaining enterprise model.<br>14. Consider paid parking in city parks.<br>15. Contract in Park Stop program in partnership with HSA to reduce costs.<br>16. Revise agreement with the San Francisco Botanical Gardens.<br>17. Offset 200% water increase from PUC with operations support on park properties co-managed by RPD and PUC. |

CITY AND COUNTY OF SAN FRANCISCO
BOARD OF SUPERVISORS

**BUDGET AND LEGISLATIVE ANALYST**
**1390 Market Street, Suite 1150, San Francisco, CA 94102**
**PHONE (415) 552-9292 FAX (415) 252-0461**

# Policy Analysis Report

To: Supervisor Peskin and Supervisor Safai
From: Budget and Legislative Analyst's Office
Re: Marina Yacht Harbor Fee Analysis
Date: January 26, 2024

## Summary of Requested Action

Your offices requested that the Budget and Legislative Analyst conduct a financial analysis of the Marina Yacht Harbor, including the annual fee revenue generated, General Fund subsidy, and options to reduce the General Fund subsidy.

***For further information about this report, contact Nicolas Menard at the Budget and Legislative Analyst's Office.***

## Executive Summary

- Activities at the Marina are primarily accounted for in the Marina Yacht Harbor special revenue fund. Revenues include permit fees for special events, concession income from vendors and the Golden Gate and St. Francis yacht clubs, and fees generated from berthing and accessory fees at the harbor.
- Fees and other revenues to the Marina do not cover all operating costs, which are budgeted at $4.86 million in FY 2023-24. To cover the shortfall, the Marina receives a General Fund subsidy which totals $592,921. Certain variable structural maintenance expenditures are accounted for outside of the Marina Yacht Harbor Fund and are also paid for with General Fund monies. In FY 2022-23, actual General Fund spending at the Marina totaled $956,077.
- A 2023 survey conducted among the 36 yacht harbors in the Bay Area revealed that the San Francisco Marina Yacht Harbor charged the highest fees to lease their berths to boat owners. Slips are charged at a set rate per linear foot and charged monthly to tenants. For every slip size offered, the Marina Yacht Harbor's rates per foot are several dollars higher than the median regional rate. There were no major differences in amenities between the Marina Harbor and regional harbors. However, the Marina Yacht Harbor is the only harbor in the Bay Area to offer slip sizes larger than 80 linear feet in length.

**Reducing General Fund Subsidy Without Any Marina Improvements**

- The BLA determined berthing fees at the East and West Harbors could be raised by 31.4 percent to fully cover the General Fund subsidy and supplemental transfer. This estimate assumes no improvements to the Marina's harbors. The BLA cannot empirically gauge whether the Marina's tenants are willing to absorb a rate increase of that magnitude. However, demand indicators at the Marina Yacht Harbor such as waitlist length and few tenant departures following the 2022 implementation of a dredging fee for West Harbor tenants, which resulted in a 20 percent rate increase for West Harbor tenants between FY 2021-22 and FY 2022-23, suggest there is room to increase rates and capture additional revenue.
- Using data from a 2019 study conducted by the Municipal Transportation Agency, the BLA determined that paid parking could largely offset the General Fund subsidy required to operate the Marina. In this case, berthing fees would have to be increased by approximately 5 percent to cover the remaining costs.

**Reducing General Fund Subsidy With Marina Improvements**

- The BLA evaluated the Marina Yacht Harbor's financial viability through FY 2036 under four scenarios, described in Exhibit A below, given the proposed Gashouse Cove remediation project with PG&E, anticipated Citywide budget cuts, and a pending ordinance to prohibit expanding the West Harbor. Apart from the Gashouse Cove remediation going through as outlined in the Final Settlement Agreement with PG&E, no scenario will result in the Marina Yacht Harbor generating enough operating revenue to cover expenditures. In these cases, the Marina must either receive General Fund support or implement a berthing fee increase between 15 and 20 percent beyond planned fee increases to break even. The scenarios do not include paid parking revenue, which, if implemented, would reduce the fee increase necessary for the Marina to become financially independent.

**Exhibit A: Scenario Summary**

| | FY 2033 and Beyond | | |
|---|---|---|---|
| # | **Scenario** | **Berthing Fee Increase** | **Marina Net Income** |
| 1 | Status Quo (No Project) | 31% fee increase for East and West Harbors | Breakeven |
| 2 | Remediation Project (As outlined in the Final Settlement Agreement) | Only for East Harbor (planned, approx. 40%) | $1 million per year |
| 3 | Modified Remediation Project (East Harbor renovation, no West Harbor expansion) | 20% fee increase beyond planned fees for East and West Harbors | Breakeven |
| 4 | Modified Remediation Project, Spending Baselined to FY 2023 | 15% fee increase beyond planned fees for East and West Harbors | Breakeven |

- This financial scenario analysis was conducted using the best available information as provided to the BLA by the Recreation and Parks Department (RPD). RPD advised additional scenarios are being explored in coordination with PG&E, as the design will dictate the type of remediation work performed.

*Project Staff: Nicolas Menard and Alex Thibodo*

## The Marina Small Craft Harbor and Recreation Area

### Amenities Overview

**Exhibit 1: Map of Marina Greens and Harbors**




Source: Google Maps

The Marina features three distinct areas of greenspace. Most notably, the Marina green spans 7.62 acres along the waterfront and offers views of the Golden Gate Bridge and the waterway between the Bay and Pacific Ocean. The Green may be rented out for special events including sports tournaments, festivals, and fundraising events. Directly southeast of the Green, the Triangle features a small outdoor calisthenics gym and just over 2 acres of greenspace. Finally, the Little Marina is a 2.2-acre rectangular lawn located on the westernmost side of the Marina park. Both the Little Marina and the Triangle are available for permitted special events.

The Marina Small Craft Harbor has 727 berthing slips across two harbors. The East Harbor, situated above the Marina Triangle, offers 326 permanent berths for watercraft ranging from 20 to 35 linear feet in length. The harbor also contains a floating fuel dock for berth owners and guests to purchase fuel for their vessels. The West Harbor also has 326 permanent berthing slips for boats between 25 and 100 linear feet in length. The West Harbor is periodically dredged, due to sediment buildup caused by tidal patterns in the immediate vicinity of the channel entrance.

Landside, the Marina features several parking lots extending from the peninsula where two concessionaire yacht clubs are situated down alongside the main Marina Green. Collectively, the Recreation and Parks Department administers 799 parking spaces in total, including

approximately 200 spaces reserved for berth owners and their crew. The remaining spaces are unrestricted and available to the public at no cost during park hours.

## Marina Budget

Administered by the Recreation and Parks Department (RPD), Marina Yacht Harbor activities are primarily accounted for in two special revenue funds: a capital fund and an operating fund.

### *Capital Budget*

The Marina's capital budget for FY 2023-24 is $12,070,879, of which $11 million is appropriated for the East Harbor remediation project. RPD advises these funds are sourced from PG&E's portion of the settlement agreement, described below, and will carry forward until remediation work begins. The remainder of the capital budget is designated for Marina dredging, which is paid for by dredging fee revenue and a transfer from the Marina operating fund. Additionally, the capital budget allocates funds for facilities and maintenance and the DBW Loan Reserve, which is paid for by a transfer from the operating fund.

**Exhibit 2: Marina Capital Budget for FYs 2022-2025**

| | FY 2022-23 | FY 2023-24 | FY 2024-25 |
|---|---|---|---|
| DBW Marina Loan Reserve | 78,700 | 77,300 | 79,654 |
| East Harbor Remediation | 1,817,590 | 11,000,000 | 0 |
| Marina Dredging | 600,000 | 550,000 | 550,000 |
| Marina Yacht Renovation | 5,233 | 5,579 | 5,683 |
| Facilities and Maintenance | 338,000 | 438,000 | 438,000 |
| **Total** | **2,839,523** | **12,070,879** | **1,073,337** |

Source: RPD Fund 19000

### *Operating Budget*

RPD's budgeted expenditures for direct operations at the Marina are $4,857,921 for FY 2023-24. The largest annual expenditure for the Marina is a $1.5 million loan repayment to the California Department of Boating and Waterways (DBW) from renovations to the Marina's West Harbor completed in 2013.[1] Outside of debt servicing, the bulk of the Marina's operating budget funds salaries and benefits for 11.79 FTE positions. The remainder of the budget is allocated towards department overhead, materials and supplies, transfers to the Marina Capital Fund to pay for maintenance costs, and costs of services rendered from other departments. Exhibit 3 below shows the budgeted operating expenditures for the previous, current, and future fiscal years.

[1] RPD advises the $24.5 million loan will be paid in full within the next 15 years.

### Exhibit 3: Marina Operating Budget for FYs 2022-23 - FY 2024-25

| | FY 2022-23 | FY 2023-24 | FY 2024-25 |
|---|---|---|---|
| Salaries | 1,161,869 | 1,196,934 | 1,231,610 |
| Fringe Benefits | 560,004 | 553,846 | 572,693 |
| Overhead & Allocations | 640,793 | 681,195 | 694,118 |
| Non-Personnel Services | 224,097 | 224,097 | 224,097 |
| Materials & Supplies | 112,000 | 112,000 | 112,000 |
| Debt Service | 1,880,686 | 1,458,020 | 1,458,020 |
| Services of Other Departments | 145,024 | 210,950 | 224,779 |
| Transfer to Marina Capital Fund | 421,933 | 420,879 | 523,337 |
| **Total** | **5,146,406** | **4,857,921** | **5,040,654** |

Source: RPD Fund 11902

Actual spending in the Marina operating fund in FY 2022-23 was $544,477 below budget due to staff vacancies ($303,825), lower than budget spending on materials and services, ($102,986), and lower than budget spending on debt service ($137,666). As shown above, the FY 2023-24 budget of $4.8 million is $288,485 lower than the FY 2022-23 budget of $5.1 million, due to a decrease in budgeted debt service costs,[2] however no adjustments were made to personnel, materials, and service budgets.

*Other Operating Costs*

As described below, in addition to the expenses noted above and accounted for in the Marina operating and capital funds, RPD pays for structural maintenance at Marina facilities, which is funded by RPD's General Fund budget. In FY 2022-23, structural maintenance costs were approximately $270,000, according to RPD staff.

## Marina Operating Revenue

As described below, Marina operating revenue consist of yacht fees, concession fees, permit fees, and a General Fund subsidy.

### Berth & Mooring Fees

The fee revenue from yacht berthing and associated chargeable services at the East and West harbors make up most of the Marina's operating revenue. As shown in Exhibit 4 below, fees collected from East Harbor operations totaled $784,134 in revenue while the West Harbor

[2] RPD advised the $422,000 decrease in debt service is from the department no longer needing to contribute money the escrow account associated with the loan.

brought in $2,946,646 in FY 2022-23—collectively representing 81 percent of the total operating revenue for the year (excluding the General Fund transfer in).

### Exhibit 4: Harbor Fees Budgeted and Actual Revenue for FYs 2022-23 – FY 2024-25

| | FY 2022-23 (Budget) | FY 2022-23 (Actuals) | FY 2023-24 (Budget) | FY 2024-25 (Budget) |
|---|---|---|---|---|
| General Fund | 686,077 | 686,077 | 592,921 | 645,954 |
| Permits | 400,000 | 317,979 | 400,000 | 412,000 |
| East Harbor Fees | 710,000 | 784,134 | 675,000 | 675,000 |
| West Harbor Fees | 2,650,000 | 2,946,646 | 2,600,000 | 2,700,000 |
| Concessions | 575,000 | 553,402 | 590,000 | 607,700 |
| Use of Fund Balance | 125,329 | 0 | 0 | 0 |
| **Total** | **5,146,406** | **5,288,238** | **4,857,921** | **5,040,654** |

Source: RPD Fund 11902

The above fees include revenue from harbor slip reservation charges, billed to berth tenants each month. Slip fees follow a progressive schedule based on the vessel's length with the fee-per-foot increasing according to the vessel's size, as illustrated in Exhibit 5 below. Notably, fees at the West Harbor are greater than those in the East Harbor for slips of comparable size due to the proximity of nearby amenities and recent renovations.[3] Additionally, fees for slips at the West Harbor include a dredging surcharge that is also applied on a fee-per-foot basis, though the dredging fee revenue is accounted for in the Marina capital fund.

[3] Per communication from RPD Deputy Director Antonio Guerra. Following the East Harbor remediation project, RPD expects slip fees will match fees to rates at the West Harbor.

## Exhibit 5: Slip Fee Schedule by Vessel Length, Harbor for FY 2023-24

| West Harbor | | | | | |
|---|---|---|---|---|---|
| **Slip Length** | **Fee (per foot)** | **Dredging Surcharge** | **# of Slips Available** | **Monthly Rate (per vessel)** | **Annual Rate (per vessel)** |
| 25 | $17.03 | $2.85 | 7 | $497.00 | $5,964.00 |
| 30 | 17.27 | 2.89 | 50 | 604.80 | 7,257.60 |
| 35 | 17.27 | 2.89 | 43 | 705.60 | 8,467.20 |
| 40 | 20.95 | 3.51 | 112 | 978.40 | 11,740.80 |
| 45 | 20.95 | 3.51 | 52 | 1,100.70 | 13,208.40 |
| 50 | 21.42 | 3.58 | 47 | 1,250.00 | 15,000.00 |
| 60 | 21.42 | 3.58 | 23 | 1,500.00 | 18,000.00 |
| 70 | 21.87 | 3.66 | 4 | 1,787.10 | 21,445.20 |
| 80 | 21.87 | 3.66 | 4 | 2,042.40 | 24,508.80 |
| 90 | 21.87 | 3.66 | 4 | 2,297.70 | 27,572.40 |
| 100 | 21.87 | 3.66 | 1 | 2,553.00 | 30,636.00 |
| Total | | | 347 | | |
| **East Harbor** | | | | | |
| **Slip Length** | **Fee (per foot)** | **-** | **# of Slips Available** | **Monthly Rate (per vessel)** | **Annual Rate (per vessel)** |
| 20 | $12.16 | - | 20 | $243.20 | $2,918.40 |
| 25 | 12.16 | - | 139 | 304.00 | 3,648.00 |
| 30 | 12.33 | - | 99 | 369.90 | 4,438.80 |
| 35 | 12.33 | - | 68 | 431.55 | 5,178.60 |
| Total | | | 326 | | |

Sources: Marina Harbormaster and Park Fee Schedule
Notes: Monthly and annual rates for West Harbor slips include the dredging surcharge.
Rates shown are for single hull vessels. Multihull vessels incur a surcharge of 40 percent of the monthly fee.
Slip counts shown are distributed between permanent berth tenants and yacht club allotments.

In addition to slip fees, captured harbor fee revenue also includes the following items:

- Guest Dockage: Covers per foot, per day fees for guest watercraft at the Marina Harbors.
- Deposits: Includes one-time deposits for berthing slips, electric adapters, and keys.
- Parking: Berth owners at the Marina Harbors are allotted two annual permitted parking passes with their slip at no additional charge. Additional annual parking passes, and the daily rates for permitted crew members or trailers are included in this fee revenue.
- Transfer fees: When boats and slips are sold and transferred between berth owners, RPD collects both an administrative fee and a per-foot transfer fee from the seller.
- Wait list fees: Covers the $103 annual fee from persons on the wait list to reserve a slip at the harbor.
- Services: Includes labor costs and fees for various services performed at the harbor.
- Other accessory fees include storage, kayak racks, key purchases, and late fees.

RPD does not track itemized fee revenue and therefore the BLA is unable to determine the proportional contribution of individual fee components to the overall funding source.[4]

Based on the number of slips and associated berthing fees in the west harbor, the revenue potential from berthing fees in the west harbor is $3.6 million, or $1.0 million less than the FY 2023-24 budgeted revenue of $2.6 million. The revenue potential in the east harbor is $1.4 million, or $725,000 less than the FY 2023-24 budgeted revenue of $675,000.

## Special Events

The Marina hosts permitted events regularly throughout the year. According to the RPD Special Event master calendar, events typically take place on weekends and can accommodate up to 10,000 attendees.[5] RPD advises permits for the main Marina green typically only cover part of the lawn, either east or west of the flagpole. So far in 2023, the only event that received a permit for the entire main green was Fleet Week.

Budgeted revenue for permitted special events at the Marina totals $400,000 in FY 2023-24. According to RPD's fee schedule, permit costs for hosting Marina events are tiered based on where the event is situated within the Marina and the hosting organization. Permits for the picnic area (Marina Green West) are priced at a lower rate than those held on the main green, and non-profit organizations are charged at half the rate of commercially sponsored events. Permits for youth sport programming do not incur charges.

### Exhibit 6: Budgeted and Actual Revenue for FYs 2022-2025

| | FY 2022-23 (Budget) | FY 2022-23 (Actuals) | FY 2023-24 (Budget) | FY 2024-25 (Budget) |
|---|---|---|---|---|
| **Special Event Permits** | $400,000 | $317,979 | $400,000 | $412,000 |

Source: RPD Fund 19002

As illustrated in Exhibit 6 above, actual revenues from special event permits totaled $317,979 in FY 2022-23, $82,021 below budgeted revenue. Budgeted revenue will increase by 3 percent in the upcoming fiscal year to $412,000.

[4] RPD advises revenue from East and West Harbor fees are tracked according to individual payee accounts rather than by revenue source.

[5] https://sfrecpark.org/DocumentCenter/View/20850/RPD-Special-Events-Calendar-Marina-Green

## Concessions

### *Yacht Clubs*

The St. Francis Yacht Club currently holds a 40-year lease with RPD, set to expire in 2054. As of December 1, 2021, base rent for St. Francis is set at $27,281 per month, or $327,370 annually. The lease agreement stipulates that every 5 years, base rent will increase according to whichever is higher: i) 115 percent of base rent, or ii) 50 percent of the property's fair market value. In addition to the base rent, St. Francis will also make payments for four guest slips in the West Harbor at the rate established in the RPD fee schedule.[6] The lease agreement further stipulates that rent paid to RPD may be discounted in proportion with approved maintenance work to the Marina Harbor performed and paid by the St. Francis Yacht Club.[7] Maintenance of the St. Francis Club and its utilities costs are paid for by the St. Francis Yacht Club.

Under the St. Francis lease agreement, the City is obligated to maintain the channel entrance to the West Harbor to an average water depth of 12 feet at median low water tide.[8] If and when the channel entrance depth reaches an average of 10 feet, the City will initiate a sampling and dredging process to return the average depth to 12 feet. St. Francis Yacht Harbor may request dredging to additional depths, at which point the Club would assume responsibility for any environmental review, legal, and dredging costs incurred by dredging beyond 12 feet of depth. Meanwhile, the Golden Gate Yacht Club agreement stipulates the City has no obligation to dredge any portion of the harbor under the lease.

The Golden Gate Yacht Club's lease is set for a term of 18 years through 2037. Per the agreement, base rent is set at 10 percent of monthly gross receipts for the preceding month with a minimum annual rent guarantee of $85,000. As they offer youth educational programming, the Golden Gate Yacht Club is not obligated to pay market rate rent under their lease.[9] In addition to base rent, the Club is obligated to pay 10 percent of the membership and dock fees collected in the prior month to the City, who will allocate these funds towards supplementing major harbor maintenance projects. RPD may suspend the Club's maintenance surcharge obligation if the Department does not have sufficient funds for major maintenance projects. As shown below, the Golden Gate Yacht Club paid $67,049 in rent to the City in FY 2022-23, which is less than the

[6] Rent for slips 113 and 115B fall under the lease agreement, while payment for slips 115 and 115A fall under a separate contract.

[7] Section 5.7 of the lease agreement stipulates that in the event St. Francis Yacht Club wishes to perform harbor maintenance otherwise administered by the City, they shall provide a detailed cost estimate to the harbormaster and RPD and come to an agreement for a credit towards St. Francis's rental obligation.

[8] See section 9.2 of the St. Francis Yacht Club lease agreement.

[9] Golden Gate Yacht Club, per their lease agreement, administers a youth sailing program that offers a low cost of entry to sailing for San Francisco students.

minimum rent required by its lease with the Recreation and Parks Department. According to Recreation and Parks Department staff, the Department is in the process of collecting the outstanding rent owed.

As shown in Exhibit 7 below, the City budgets $350,000 and $80,000 in revenue from the leases for the St. Francis Yacht Club and Golden Gate Yacht Club, respectively. In FY 2022-23, the yacht clubs collectively produced just over 90 percent of their budgeted revenue in rental payments. Meanwhile, budgeted revenue for St. Francis Yacht Club and Golden Gate Yacht Club is set to increase by 3 percent each in FY 2024-25.

### Exhibit 7: Budgeted and Actual Revenue from Yacht Clubs for FY 2022-23 – FY 2024-25

| | FY 2022-23 (Budget) | FY 2022-23 (Actuals) | FY 2023-24 (Budget) | FY 2024-25 (Budget) |
|---|---|---|---|---|
| **St. Francis Yacht Club** | $350,000 | $327,371 | $350,000 | $360,500 |
| **Golden Gate Yacht Club** | 85,000 | 67,049 | 80,000 | 82,400 |
| **Total** | **$435,000** | **$394,420** | **$430,000** | **$442,900** |

Source: RPD Fund 19002

*Permitted Vendors*

RPD currently holds leases with six vendors at the Marina, listed below in Exhibit 8, each set for a term of 12 months. Base rent for each establishment varies. Some vendors are obligated to pay a flat proportion of gross receipts, while others must pay the greater of a minimum monthly payment or a portion of gross receipts. Moreover, establishments with minimum monthly payment agreements may either have a flat payment obligation, or a minimum payment amount that varies seasonally.

### Exhibit 8: Active Permit Agreements at Marina

| Vendor | Type | Permit Fees |
|---|---|---|
| **Dynamo Donuts** | Kiosk | 10% of gross receipts |
| **Philz Coffee** | Mobile Food Truck | Equal to the greater of minimum monthly payment or 10% of gross receipts |
| **Parkwide Bike Rental** | Kiosk and Storage | 13.5% of gross receipts |
| **Cousins Maine Lobster** | Mobile Food Truck | 10% of gross receipts |
| **Los Colores 709** | Mobile Food Bike | Equal to the greater of minimum monthly payment or 10% of gross receipts |
| **Hometown Creamery** | Mobile Food Truck | Equal to the greater of minimum monthly payment or 10% of gross receipts |

Source: Permit agreements between vendors and RPD

Additionally, RPD holds a lease agreement with the Chevron-operated floating fuel dock in the East Harbor. The current agreement is a month-to-month contract from 2000 and indicates that base rent paid to RPD is a combination of set payment per gallon sold, revenue from dry boat storage and boat hoist operations, and a portion of remaining gross receipts.

As shown in Exhibit 9 below, budgeted revenue from the fuel dock in FY 2023-24 is $40,000 while expected revenues from other vendors are collectively set at $120,000. Actual concession revenue in FY 2022-23 exceeded expectations by over $23,000 while revenue from the fuel dock fell short of budget by just over $10,000. Both revenue sources are set to increase their budgets by 3 percent in FY 2024-25.

### Exhibit 9: Budgeted and Actual Revenue from Permitted Vendors, FYs 2022-23 - FY 2024-25

| | FY 2022-23 (Budget) | FY 2022-23 (Actuals) | FY 2023-24 (Budget) | FY 2024-25 (Budget) |
|---|---|---|---|---|
| **Marina Green Concessions** | $100,000 | $123,077 | $120,000 | $123,600 |
| **Fuel Dock** | 40,000 | 29,761 | 40,000 | 41,200 |
| **Total** | **$140,000** | **$152,838** | **$160,000** | **$164,800** |

Source: RPD Fund 11902

## General Fund

According to RPD, the General Fund subsidy to the Marina Yacht Harbor Fund pays for the appropriated operating expenditures after budgeted operating revenue sources have been exhausted. The General Fund subsidy to Marina operations in FY 2023-24 is $592,921, as shown in Exhibit 10 below, and will increase 8.9 percent to $645,954 in FY 2024-25.

### Exhibit 10: General Fund Subsidy, FY 2022-23 - FY 2024-25

| | FY 2022-23 (Budget) | FY 2022-23 (Actuals) | FY 2023-24 (Budget) | FY 2024-25 (Budget) |
|---|---|---|---|---|
| General Fund Transfer | $686,077 | $686,077 | $592,921 | $645,954 |
| Other General Fund Spending | $270,000 | $270,000 | $278,000 | $285,000 |
| **Total General Fund Subsidy** | **$956,077** | **$956,077** | **$870,921** | **$930,954** |

Source: Fund 11902

RPD advised that in addition to the subsidy, General Fund monies cover structural maintenance and gardening expenditures that are accounted for outside of the Marina Yacht Harbor Fund.[10] These expenditures are variable year-to-year and are administered by the operations division of RPD. In FY 2022-23, structural maintenance expenditures at the Marina were $270,000, bringing total General Fund spending to $956,077 for that year.

## Regional Fee Comparison

The following section will report key findings from the 2023 Annual Marina and Boatyard Survey. The survey, conducted each year, polls the 36 public and private marinas in the Bay Area regarding their harbors' berth rates, amenities, accessory fees, and occupancy rates.

### Highest Fees and Largest Berths

According to the 2023 survey results, the San Francisco Marina Yacht West Harbor had the highest rate per linear foot for almost all slip sizes in the Bay Area. For 35' slips, the West Harbor was the third most expensive out of the 36 harbors polled. As shown in Exhibit 11 below, West Harbor rates per foot are nearly double the median and average rates for regional harbor slips of comparable sizes. For the slip sizes where the West Harbor has the most expensive rates, the Marina's rates exceed those of the second-most expensive by one to six dollars per linear foot. While not illustrated in the table below, rates for the 20 to 35-foot East Harbor slips at approximately $11 per linear foot are in line with the median and average rates recorded throughout the regional harbors.

[10] RPD's structural maintenance subdivision provides trade work including painting, carpentry, and electrical work within San Francisco parks.

## Exhibit 11: Comparative Fee Schedule by Slip Size

| Slip Size | Marina Rate Per Foot | Median Rate Per Foot | Average Rate Per Foot |
|---|---|---|---|
| 25’ | $18.36 | $9.96 | $10.79 |
| 30’ | 18.62 | 10.26 | 11.15 |
| 35’ | 18.62 | 10.93 | 12.25 |
| 40’ | 22.58 | 12.2 | 13.12 |
| 45’ | 22.58 | 12.08 | 13.24 |
| 50’ | 23.09 | 13.75 | 15.33 |
| 55’ | 23.09 | 13.75 | 13.44 |
| 60’ | 23.09 | 13.87 | 15.2 |
| 70’ | 23.58 | 17.37 | 17.53 |
| 80’ | 23.58 | 15.19 | 16.42 |
| 90’ | 23.58 | - | - |
| 100’ | 23.58 | - | - |

Source: 2023 Annual Marina and Boatyard Survey Results
Notes: Marina slip rates shown are for the West Harbor only and reflect the slip fees submitted by the Marina harbormaster when responding to the survey.

As shown in Exhibit 12 below, the Marina Yacht Harbor is notably the only harbor in the Bay Area that offers slip sizes longer than 80 linear feet in length. The West Harbor accommodates four 90-foot slips and one 100-foot berth. Otherwise, the distribution of slip sizes at the Marina largely reflects that of the greater regional harbor stock and is largely concentrated between slip sizes of 30 and 40 linear feet in length.

### Exhibit 12: Slip Size Distribution at Marina and Regional Harbors

| | Marina Harbor | | Regional Harbors | |
|---|---|---|---|---|
| **Slip** | **Count** | **% of Total Stock** | **Count** | **% of Total Stock** |
| 25' | 28 | 4.29 | 1,653 | 13.05 |
| 30' | 187 | 28.68 | 3,148 | 24.84 |
| 35' | 141 | 21.63 | 2,516 | 19.86 |
| 40' | 172 | 26.38 | 2,235 | 17.64 |
| 45' | 47 | 7.21 | 1,390 | 10.97 |
| 50' | 43 | 6.60 | 811 | 6.40 |
| 55' | 0 | - | 271 | 2.14 |
| 60' | 21 | 3.22 | 292 | 2.30 |
| 65' | 0 | - | 68 | 0.54 |
| 70' | 4 | 0.61 | 34 | 0.27 |
| 80' | 4 | 0.61 | 12 | 0.09 |
| 90' | 4 | 0.61 | 0 | - |
| 100' | 1 | 0.15 | 0 | - |
| **Total** | **652** | | **12,671** | |

Source: 2023 Annual Marina and Boatyard Survey Results
Notes: Marina figures include both East and West Harbor slip counts. Regional harbor counts exclude Marina Harbor counts.

## Standard Amenities Relative to Regional Accommodations

Outside of slip fee pricing, the amenities and accessory fees offered by the Marina Yacht Harbor largely reflect that of the typical marina in the Bay Area. Amenities offered by more than 50 percent of regional harbors such as Wi-Fi, free parking for berth owners, and yacht clubs on or near the premises are also present at Marina Harbor. Likewise, amenities and services offered by a minority of regional harbors are typically not included at the Marina. These include features such as a boat wash, houseboat accommodations, and dry storage. Furthermore, the average harbor occupancy rate for Bay Area harbors is approximately 87 percent according to survey results. The Marina Yacht Harbor did not respond to the survey question regarding occupancy, however RPD provided the BLA with occupancy statistics for the West Harbor between July and November 2023. During these months, occupancy hovered between 85 and 89 percent.

Key differences from other harbors include the presence of a fuel dock. Including the Marina Yacht Harbor, only 15 of the 36 regional harbors polled have a fuel dock on the premises. Additionally, the Marina Yacht Harbor does not allow liveaboards and associated fees, while this

is only true for four other harbors in the Bay Area.[11] Liveaboards are prohibited under the Marina Rules and Regulations and under the lease agreement with the St. Francis Yacht Club, as well.

## Recommended Mechanisms to Cover General Fund Subsidy

The recommendations selected as options to increase the Marina's operating revenue and eliminate the General Fund subsidy were chosen according to the following criteria:

1. Fiscal Impact: The recommendation must be able to generate a sizeable increase in Marina revenue to the extent it could reasonably cover most or all of the General Fund subsidy for FY 2024-25 in the amount of $645,954, plus a supplemental General Fund allocation for structural maintenance expenditures. Assuming a 3 percent increase in expenditures each fiscal year, we anticipate a supplemental General Fund allocation of approximately $285,000, bringing the total amount of additional revenue necessary to cover General Fund money to $930,954.
2. Feasibility: The recommendation must be within the powers of the Recreation and Parks Department and/or the Board of Supervisors. Additionally, the recommendation must be reasonable under economic conditions, avoiding excessive fees and unrealistic demands of Marina patrons and the public.
3. Reliability: The recommendation must be able to generate revenue in a predictable manner, thereby mitigating the risk of over or under-budgeting. Emphasis is placed on favoring fixed or less variable price structures for increased financial stability.

The estimates included in the following section represent the best possible approximations of scenarios and figures given the data RPD provided to the BLA. RPD advises additional scenarios are being considered and analyzed, using engineering information the BLA does not have access to.

### Raise Berthing Fees

*Fiscal Impact*

The Recreation and Parks Department could increase harbor berthing and accessory fees by 31.4 percent to fully cover Marina operating expenditures and eliminate the need for General Fund support. Exhibit 13 below shows a revised FY 2025-26 operating budget using the FY 2024-25 operating budget as a baseline. If the General Fund subsidy and supplemental monies were to

[11] Liveaboards describe persons whose permanent or partial residence is aboard their watercraft at a marina. Regional liveaboard slip rates typically incur an additional fee ranging between $100 and $500 per month.

be completely removed from the Marina's budget, and all operating expenditures, permit revenue, and concession revenue were to increase by 3 percent the following fiscal year, harbor fees overall would need to increase by 31.42 percent for revenue to break even with expenditures, assuming no change in slip occupancy.

### Exhibit 13: Marina Budget Adjusted to Cover General Fund

| Expenditures | FY 2024-25 | Change | FY 2025-26 |
|---|---|---|---|
| **Marina Fund Budgeted Expenditures** | $5,040,654 | 3% | $5,191,874 |
| **Structural Maintenance** | 285,000 | 3 | 293,550 |
| ***Total*** | ***$5,325,654*** | | ***$5,485,424*** |
| **Revenue** | **FY 2024-25** | **Change** | **FY 2025-26** |
| **General Fund (Subsidy)** | $645,954 | -100% | $0 |
| **General Fund (Supplemental)** | 285,000 | -100 | 0 |
| **Permits** | 412,000 | 3 | 424,360 |
| **East & West Harbor Fees** | 3,375,000 | 31.42 | 4,435,425 |
| **Concessions** | 607,700 | 3 | 625,931 |
| ***Total*** | ***$5,325,654*** | | ***$5,485,716*** |

Source: FY 2024-25 Operating Budget, BLA Analysis

For a 40-foot boat currently docked at the Marina Yacht Harbor, this fee adjustment would equate to a monthly payment increase from $903 to $1,187 and an additional $3,404 per year being paid to the Marina between Fiscal Years 2024-25 and 2025-26.

*Feasibility*

The workability that the Marina will be able to increase their fees by 31.4 percent without causing a significant decrease in patronage relies upon how elastic the demand is for harbor slips from current and potential berth tenants. The San Francisco Marina Small Craft Yacht Harbor already has the highest fees per linear foot in the Bay Area. Furthermore, the regional harbor vacancy rate averaged 18 percent in 2023, which offers Marina patrons the option to relocate to other nearby harbors should fees become prohibitively high. However, in July 2022, the Board approved a Dredging Fee for west harbor slips, effectively increasing slip fees by 20 percent. According to RPD staff, this had no impact on the occupancy and waitlist at the West Harbor.

Despite high fees, standard amenities, and the availability of slips at nearby harbors, demand for slips at the Marina exceeds supply by 54 percent. As of 2023, the waitlist for the 326 slips in the West Harbor is comprised of 177 individuals who pay an annual fee of $103 to remain in the queue. The distribution of waitlist members per requested slip size is shown in Exhibit 14 below.

### Exhibit 14: Wait List Length by Slip Size

| Slip Size | 25' | 30' | 35' | 40' | 45' | 50' | 60' | 70' | 80' | 90' |
|---|---|---|---|---|---|---|---|---|---|---|
| Wait List | 8 | 27 | 29 | 27 | 21 | 17 | 16 | 14 | 9 | 9 |

Source: RPD West Harbor wait list.
Note: RPD advises the wait list for East Harbor slips is currently closed.

To implement the proposed fee increase, RPD must determine how to increase itemized fees in a manner that increases collective harbor berthing and accessory fees by 31.42 percent. Secondly, the Board of Supervisors would have to amend the Park Code to adjust the fee schedule beyond the standard CPI adjustment.

*Reliability*

RPD could improve the reliability of fee revenue and possibly lower the fee increase necessary to cover operating expenditures by implementing management strategies to reduce berth turnover at the Marina. In Exhibit 15 below, the BLA calculates the fee revenue expected at occupancy rates between 80 to 100 percent using actual revenue and scheduled fees for FY 2022-2023. Actual fee revenues for FY 2022-2023 at the West and East Harbors were $2.9 million and $784,134, respectively. These fees include non-berthing revenue, prohibiting the BLA from estimating an accurate occupancy rate, however RPD occupancy reporting for 2023 suggests West Harbor occupancy was approximately 87 percent. RPD did not provide occupancy data for the East Harbor, but advised occupancy is far lower due to the continued loss of slips to deterioration. RPD is unable to repair East Harbor slips at this time due to contamination in Gashouse Cove.

### Exhibit 15: Fee Revenue Potential by Occupancy Rate

| West Harbor Occupancy | | | | | | |
|---|---|---|---|---|---|---|
| | Actual | 100% | 95% | 90% | 85% | 80% |
| Revenue | $2,946,646 | 3,196,895 | 3,037,050 | 2,877,205 | 2,717,361 | 2,557,516 |
| **East Harbor Occupancy** | | | | | | |
| | Actual | 100% | 95% | 90% | 85% | 80% |
| Revenue | $784,134 | 1,284,429 | 1,220,208 | 1,155,986 | 1,091,765 | 1,027,543 |

Source: FY 2022-23 RPD Actual Revenue, BLA analysis

As shown above, just a 5 percent increase in overall occupancy could generate more than $220,000 in revenue between the East and West harbors, based on current fees.

## Charge for Public Parking at Marina Lots

*Fiscal Impact*

RPD could implement paid public parking at the Marina parking lots to cover the vast majority of the $930,954 in General Fund support to the Marina. The Municipal Transportation Authority (MTA) conducted a parking feasibility study in 2019 at the request of RPD that estimated the entry costs, routine expenditures, and revenue that could be expected if the Marina converted their public lots to a paid parking system. Continuing the 3 percent expenditure and revenue increase between fiscal years assumed by the MTA, the BLA adjusted the five-year net income estimated by the MTA and show them in Exhibit 16 below.

**Exhibit 16: Estimated Costs and Revenue for Marina Paid Parking**

| | FY 2024-25 | FY 2025-26 | FY 2026-27 | FY 2027-28 | FY 2028-29 |
|---|---|---|---|---|---|
| **Parking Revenue** | $1,323,208 | $1,362,904 | $1,403,791 | $1,445,905 | $1,489,282 |
| Parking Tax | (246,178) | (253,563) | (261,170) | (269,005) | (277,076) |
| Credit Card Fees | (116,832) | (120,337) | (123,947) | (127,665) | (131,495) |
| Pay by Phone Fees | (3,282) | (3,380) | (3,482) | (3,586) | (3,694) |
| Expense | (190,819) | (196,544) | (202,440) | (208,513) | (214,768) |
| One Time Implementation Cost | (719,492) | 0 | 0 | 0 | 0 |
| **Parking Net Income** | **$46,605** | **$789,080** | **$812,752** | **$837,135** | **$862,249** |

Source: MTA 2019 Analysis

According to MTA estimates, paid parking at the Marina would generate positive profit immediately after the first year, and approximately $790,000 the following year assuming implementation occurs in 2024.

Exhibit 17 below incorporates the BLA-adjusted parking revenue estimates with the Marina Operating budget for FYs 2024-2027. Assuming parking meters are implemented in FY 2024-25 and the General Fund support to the Marina ends the following year, the Marina operating budget would see a budget shortfall of $169,803 and $174,898 in the subsequent two fiscal years.

### Exhibit 17: Example Marina Operating Budget Including Paid Parking Revenue

| **Expenditures** | **FY 2024-25** | **FY 2025-26** | **FY 2026-27** |
|---|---|---|---|
| Marina Fund Budgeted Expenditures | $5,040,654 | $5,191,874 | $5,347,630 |
| Structural Maintenance | 285,000 | 293,550 | 302,357 |
| ***Total*** | ***$5,325,654*** | ***$5,485,424*** | ***$5,649,987*** |
| **Revenue** | **FY 2024-25** | **FY 2025-26** | **FY 2026-27** |
| General Fund (Subsidy) | $645,954 | $0 | $0 |
| General Fund (Supplemental) | 285,000 | 0 | 0 |
| Permits | 412,000 | 424,360 | 437,091 |
| Harbor Fees | 3,375,000 | 3,476,250 | 3,580,537 |
| Concessions | 607,700 | 625,931 | 644,709 |
| Parking Net Income | 46,605 | 789,080 | 812,752 |
| ***Total*** | ***$5,372,259*** | ***$5,315,621*** | ***$5,475,089*** |
| **Marina Net Income** | **46,605** | **(169,803)** | **(174,898)** |

Source: MTA 2019 Analysis, BLA Analysis
Note: Revenue and expenditure estimates assume a 3 percent growth between fiscal years.

*Feasibility*

If enacted, the Marina would be just one of three RPD properties to have paid public parking on the premises.[12] To charge for public parking in the Marina lots, the Board of Supervisors must amend the Park Code to authorize the MTA to set rates for parking spots on the premises.[13] The financial impact noted above assumes that all 799 parking spaces are charged for parking, include the 199 currently set-aside for berth tenants, who currently are provided two free parking spaces per berth.

*Reliability*

Revenue estimates for paid parking at the Marina were generated in 2019, prior to the COVID-19 pandemic, based on rates and usage from the adjacent Fort Mason parking lot. It is reasonable to believe revenue estimates calculated today would differ from MTA conclusions, especially as permitted events have not yet returned to pre-2020 levels. However, the estimates derived from the MTA study conservatively assume that throughout the year, occupancy of the public parking stalls would average 25% with an average stay of 2.5 hours.

[12] Golden Gate Park's music concourse and Kezar Stadium parking lot are the only two RPD-managed paid parking facilities in the City.

[13] Section 6.14 of the Park Code authorizes the MTA to work with RPD staff to 1) identify locations for the establishment of paid parking, 2) set rates for paid parking on park property, and 3) develop and implement a parking management plan for park properties with parking facilities.

### Parking and Berthing Fee Increase

Through a combined approach of implementing paid parking and instituting a modest berthing fee increase above the standard 3 percent adjustment between fiscal years, RPD stands to achieve independence from General Fund transfers to the Marina Yacht Harbor Fund. To cover the revenue shortfall after paid parking is established at the public Marina lots, RPD would need to increase harbor fees by just 5.03 percent for operating revenue to break even with budgeted expenditures.

## Policy Considerations

### Gashouse Cove Remediation

*Overview of Settlement and Proposed Remediation Project*

In the 19th and early 20th centuries, Pacific Gas and Electric (PG&E) operated a coal gasification plant near what is currently the East Harbor of the Marina. Site studies conducted several decades later discovered that toxic chemical compounds from the plant's output were polluting the soils and sediments underlying the East Harbor. The City filed a lawsuit against PG&E in 2001 seeking recovery of costs related to the cleanup of the contamination. The parties reached a Final Settlement Agreement in 2020.

In 2021, the San Francisco Board of Supervisors passed a resolution approving the Final Settlement Agreement (File 21-0067), which provided a high-level scope of the project, outlined project management responsibilities, and set the terms for cost-sharing and repayment according to expected project output. Per the settlement agreement, the remediation and contingency costs not to exceed $160 million will be paid for by PG&E. The City will reimburse PG&E for 9 percent of the project costs up to $160 million, and excess contingency costs incurred beyond $160 million up to $190 million will be shared on a 50-50 percent basis between the parties. PG&E will initially fund all project costs and the City will repay its share from Marina revenues at zero percent interest beginning three years after the remediation is completed for a term of 30 years. Exhibit 18 below shows the estimates that form the basis of the settlement amount. Any costs beyond $190 million would have to be agreed by both parties and cost sharing would be subject to a future agreement.

## Exhibit 18: Marina Yacht Harbor Project Budget

| Cost | Estimate | Cost-Sharing[1] |
|---|---|---|
| Pre-Construction | $3,523,000 | 91-9 |
| CEQA/Regulatory Compliance | 4,450,000 | 91-9 |
| Public Fuel Dock | 2,289,000 | 91-9 |
| East Harbor Remediation | 67,961,000 | 91-9 |
| East Harbor Renovation, Public Access, and Recreational Amenities | 23,897,000 | 91-9 |
| West Harbor Breakwater and Marina Improvements | 27,880,000 | 91-9 |
| *Subtotal* | *$130,000,000* | |
| Contingency | $30,000,000 | 91-9 |
| Excess Contingency | $30,000,000 | 50-50 |
| **Total** | **$190,000,000** | |

Source: Final Settlement Agreement between PG&E and the City of San Francisco
Notes: [1] Reflects the percentage obligation for PG&E and percentage obligation for the City, respectively.

While the project is still in the early design phase, the proposed project components developed over the course of the settlement agreement includes both the clean-up of the East Harbor and the construction of new public amenities. Specifically, the San Francisco Marina Improvement and Remediation Project would:

1. Demolish all docks and berths in the East Harbor.
2. Dredge the northern half of the East Harbor to remove pollutants.
3. Backfill the southern half of the East Harbor with an engineered sediment cap, to prevent contaminated sediment from leeching into the water.
4. Reconstruct the docks and berths in the northern half of the East Harbor.
5. Expand the West Harbor to accommodate the lost slips from the southern half of the East Harbor and to add a fuel dock.
6. Construct a new breakwater for the West Harbor that will decrease the dredging frequency.

With the engineered sediment cap, the southern half of the East Harbor would be too shallow for the berths to return. RPD anticipates this cove would become five acres of protected shallow open water recreation. According to the resolution approved by the Board of Supervisors accepting the Final Settlement Agreement, the project framework outlined in the settlement is

subject to future City approvals, California Environmental Quality Act review, and other environmental regulatory oversight.[14]

### *Implications for Fee Revenue*

The Board of Supervisors is currently considering an ordinance to limit the extension of the West Harbor by more than 150 feet from its current boundary (File 23-1191). Such a decision would effectively prohibit lost East Harbor slips from being redistributed to the West Harbor and reduce potential fee revenue by $2.0 million per year, altering the extent to which support from the General Fund and/or alternative revenue streams will be needed.

**Scenario 1: No Improvements to the Marina**

Exhibit 19 below outlines an estimated budget schedule for the Marina between Fiscal Years 2029-30 through FY 2035-36 for the scenario in which the remediation project does not proceed as planned. Under these circumstances, operating revenue would fall short of expenditures by more than $1 million per year, requiring a General Fund subsidy or a 27.6 percent increase to overall berthing fees. When accounting for the year-to-year increase in expenditures, the required fee hike translates to a one-time 31.4 percent increase, as explained earlier, with subsequent 3 percent annual increases thereafter.

[14] File 21-0067

## Exhibit 19: Marina Status Quo Budget Schedule
## FYs 2029-30 – FY 2035-36

| | FY 2030 | FY 2031 | FY 2032 | FY 2033 | FY 2034 | FY 2035 | FY 2036 |
|---|---|---|---|---|---|---|---|
| **Expenditures** | | | | | | | |
| Operating | 5,843,499 | 6,018,804 | 6,199,369 | 6,385,350 | 6,576,910 | 6,774,217 | 6,977,444 |
| Structural Maintenance | 330,393 | 340,305 | 350,514 | 361,029 | 371,860 | 383,016 | 394,507 |
| **Total Expenditures** | **6,173,893** | **6,359,109** | **6,549,883** | **6,746,379** | **6,948,771** | **7,157,234** | **7,371,951** |
| **Revenue** | | | | | | | |
| Permits | 477,621 | 491,950 | 506,708 | 521,909 | 537,567 | 553,694 | 570,304 |
| East Harbor Fees | 782,510 | 805,985 | 830,165 | 855,070 | 880,722 | 907,144 | 934,358 |
| West Harbor Fees | 3,130,040 | 3,223,941 | 3,320,659 | 3,420,279 | 3,522,888 | 3,628,574 | 3,737,431 |
| Concessions | 704,491 | 725,626 | 747,394 | 769,816 | 792,911 | 816,698 | 841,199 |
| **Total Revenues** | **5,094,662** | **5,247,502** | **5,404,927** | **5,567,074** | **5,734,087** | **5,906,109** | **6,083,293** |
| **Marina Net Income** | (1,079,231) | (1,111,608) | (1,144,956) | (1,179,305) | (1,214,684) | (1,251,124) | (1,288,658) |
| *Fee Increase Necessary to Cover Shortfall* | 27.6% | 27.6% | 27.6% | 27.6% | 27.6% | 27.6% | 27.6% |

Source: BLA Analysis

Notes: All revenue and expenditure estimates are assumed to increase 3 percent each year, using the FY 2024-25 operating budget as a baseline. The Fee Increase Necessary to Cover Shortfall figures represent the same-year one-time fee increase needed to cover unfunded expenditures that year.

**Scenario 2: Remediation Project**

Exhibit 20 below shows a potential budget schedule for the Marina under the same time period, but assumes the remediation project proceeds as described in the Final Settlement Agreement at a cost of $160 million. The cost includes base project cost of $130 million plus the $30 million contingency, but not the $30 million Excess Contingency. Here, East Harbor fees are calculated by assuming 90 percent occupancy for 172 reconstructed berths charged at the same rate as West Harbor slips. RPD advised they intend to equalize East and West Harbor fee rates to pay for the City's obligation to the PG&E settlement. Notably, this change would represent an increase of approximately 40 percent for East Harbor berth tenants. West Harbor Fees include revenue from its existing berths and the expansion of 235 additional slips at 90 percent occupancy.[15] Assuming construction finishes, and revenue begins generating in FY 2029-30, repayment to PG&E would begin in FY 2032-33 in the amount of $480,000 per year. If the remediation project requires use of the project's Excess Contingency, the debt service would increase from an assumed $480,000 per year to $980,000 per year.

[15] Though not accounted for in the West Harbor Fees item of the operating budget, the BLA notes dredging fees imposed on West Harbor berth tenants may be reduced or eliminated, given the reduced dredging frequency needed with the new proposed breakwater. Eliminating the dredging fee would represent a 14 percent decrease in fees for West Harbor berth tenants, if implemented.

## Exhibit 20: Marina Budget Schedule Under Remediation Project
## FYs 2029-30 – FY 2035-36

| | FY 2030 | FY 2031 | FY 2032 | FY 2033 | FY 2034 | FY 2035 | FY 2036 |
|---|---|---|---|---|---|---|---|
| **Expenditures** | | | | | | | |
| Operating | 5,843,499 | 6,018,804 | 6,199,369 | 6,385,350 | 6,576,910 | 6,774,217 | 6,977,444 |
| Structural Maintenance | 330,393 | 340,305 | 350,514 | 361,029 | 371,860 | 383,016 | 394,507 |
| PG&E Debt Service | | | | 480,000 | 480,000 | 480,000 | 480,000 |
| **Total** | **6,173,893** | **6,359,109** | **6,549,883** | **7,226,379** | **7,428,771** | **7,637,234** | **7,851,951** |
| **Revenue** | | | | | | | |
| Permits | 477,621 | 491,950 | 506,708 | 521,909 | 537,567 | 553,694 | 570,304 |
| East Harbor Fees | 1,340,713 | 1,380,935 | 1,422,363 | 1,465,034 | 1,508,985 | 1,554,254 | 1,600,882 |
| West Harbor Fees | 4,961,829 | 5,110,683 | 5,264,004 | 5,421,924 | 5,584,582 | 5,752,119 | 5,924,683 |
| Concessions | 704,491 | 725,626 | 747,394 | 769,816 | 792,911 | 816,698 | 841,199 |
| **Total** | **7,484,654** | **7,709,193** | **7,940,469** | **8,178,683** | **8,424,044** | **8,676,765** | **8,937,068** |
| **Marina Net Income** | **1,310,761** | **1,350,084** | **1,390,586** | **952,304** | **995,273** | **1,039,531** | **1,085,117** |

Source: BLA Analysis

Notes: PG&E Debt Service amount is assumed to be $14.4 million over 30 years, representing 9 percent of the $130 million project costs plus $30 million contingency.

All revenue and expenditure estimates are assumed to increase 3 percent each year, using the FY 2024-25 operating budget as a baseline.

As shown above, the Marina stands to operate at a surplus of approximately $1.0 million per year if the remediation project goes through as planned, after including new debt service for the PG&E loan, without requiring support from the General Fund or additional revenue streams. According to RPD, the surplus will be used to fund a deferred maintenance fund. Deferred maintenance needs are estimated to cost approximately $1.3 million per year, based on a lifecycle analysis of Marina assets.[16] The Marina's operating budget in the exhibit above includes a $700,000 transfer, on average starting in FY 2033, to the Marina capital budget to pay for maintenance needs, leaving a remaining capital funding need of approximately $650,000, on average, per year, if policy makers decide to fully fund the Marina's estimated capital needs.

[16] Deferred maintenance projects include the improvements to the Harbormasters Office, Marina Green bathrooms, landscaping, and parking lot.

### Scenario 3: Modified Remediation Project

Next, we consider the impact of the project control ordinance limiting the expansion of West Harbor. In this scenario, the remediation project moves forward as planned, except for reconstructing the lost East Harbor slips in the West Harbor. We assume no other project scope changes. Exhibit 21 below outlines the estimated budget schedule under these circumstances. Here, the West Harbor is assumed to generate revenue with its existing slips and occupancy rates, while the East Harbor would collect fees from its proposed 172 reconstructed slips, charged at the same rate as West Harbor berths. Debt service to PG&E is reduced to a flat payment of $390,000 per year as the estimated $30 million to expand the West Harbor would no longer be included in total project costs.

**Exhibit 21: Marina Budget Schedule Without West Harbor Expansion for Fys 2029-30 – FY 2035-36**

| | FY 2030 | FY 2031 | FY 2032 | FY 2033 | FY 2034 | FY 2035 | FY 2036 |
|---|---|---|---|---|---|---|---|
| **Expenditures** | | | | | | | |
| Operating | 5,843,499 | 6,018,804 | 6,199,369 | 6,385,350 | 6,576,910 | 6,774,217 | 6,977,444 |
| Structural Maintenance | 330,393 | 340,305 | 350,514 | 361,029 | 371,860 | 383,016 | 394,507 |
| PG&E Debt Service | | | | 390,000 | 390,000 | 390,000 | 390,000 |
| **Total Expenditures** | **6,173,893** | **6,359,109** | **6,549,883** | **7,136,379** | **7,338,771** | **7,547,234** | **7,761,951** |
| **Revenue** | | | | | | | |
| Permits | 477,621 | 491,950 | 506,708 | 521,909 | 537,567 | 553,694 | 570,304 |
| East Harbor Fees | 1,340,713 | 1,380,935 | 1,422,363 | 1,465,034 | 1,508,985 | 1,554,254 | 1,600,882 |
| West Harbor Fees | 3,130,040 | 3,223,941 | 3,320,659 | 3,420,279 | 3,522,888 | 3,628,574 | 3,737,431 |
| Concessions | 704,491 | 725,626 | 747,394 | 769,816 | 792,911 | 816,698 | 841,199 |
| **Total Revenues** | **5,652,865** | **5,822,451** | **5,997,125** | **6,177,038** | **6,362,349** | **6,553,220** | **6,749,817** |
| **Marina Net Income** | **(521,027)** | **(536,658)** | **(552,758)** | **(959,341)** | **(976,421)** | **(994,014)** | **(1,012,134)** |
| *Fee Increase Necessary To Cover Shortfall*[1] | *12%* | *12%* | *12%* | *20%* | *20%* | *20%* | *20%* |

Source: BLA Analysis

[1] Represents the one-time, same-year increase needed to cover shortfall.

As shown above, the BLA estimates that this scenario would generate an operating revenue shortfall of approximately $1 million dollars per year once debt service to PG&E begins. In order to cover the loss without transfers from the General Fund, the BLA estimates that berthing fees in the East and West harbor would need to increase by 20 percent by the time debt service begins for the Marina to break even, including the annual $700,000 maintenance transfer to the capital fund. To generate revenue sufficient to maintain capital spending of $1.3 million per year, fees would need to be increased by 32 percent rather than 20 percent.

**Scenario 4: Modified Remediation Project, Spending Baselined to Actual Spending in FY 2022-23**

Finally, as noted above, FY 2022-23 spending in the Marina operating fund was $544,477 less than budgeted, while revenues that year included a $686,077 General Fund transfer. Due to the City's projected General Fund deficits in FY 2024-25 and beyond, the Department is considering eliminating the Marina's General Fund subsidy in FY 2024-25, which would essentially freeze operational spending at the Marina $141,600 below FY 2022-23 actual spending. If that spending level is maintained but escalated by three percent through FY 2036, then berthing fees would need to be increased by 15 percent by the time debt service payments begin to cover operating costs if the remediation project is completed without the expansion of the West Harbor.

## Conclusion

The Marina Small Craft Yacht Harbor currently does not generate enough revenue to cover expenditures and therefore cannot operate independently from the General Fund. The Recreation and Parks Department has been developing a project, largely funded by PG&E and a thirty-year repayment of certain project costs by the City, that would remediate contamination and renovate slips in the Marina's East Harbor and expand the number of slips in the West Harbor. The renovated and new slips would together be more than sufficient revenue to cover the Marina's operations, with net income going towards deferred maintenance needs.

The Board of Supervisors is considering an ordinance (File 23-1191) that would prohibit expansion of the West Harbor. After evaluating regional harbor fees, current revenue streams, and berth demand at the Marina, we conclude there are two viable options for the Recreation and Parks Department to significantly reduce or eliminate reliance on the General Fund if the Marina's West Harbor is not expanded. The Department could increase berthing fees at the East and West Harbors by 15 to 20 percent more than currently planned to achieve total financial independence from the General Fund. RPD could also implement paid parking at the public Marina lots and in turn increase operating revenue by enough to cover 82 percent of the current General Fund subsidy, thereby reducing the fee increase necessary to cover remaining costs no longer funded by the General Fund. Through a combined approach of instituting paid parking, modestly increasing berthing fees, and adopting strategies to improve optimal harbor management, the Marina could achieve its intended goal of financial independence from the General Fund.

HALEY ALDRICH

www.haleyaldrich.com

DRAFT EAST HARBOR FEASIBILITY STUDY
SAN FRANCISCO, CALIFORNIA
WATER BOARD FILE NO. T10000005263 (RAS)
SITE ID: 2020594

for
Pacific Gas and Electric Company
Oakland, California

File No. 128178-029
December 2022

**Cost Comparison with Other Alternatives:**

These values are based on **2022 dollars** and may be adjusted for inflation or scope changes in later planning stages.

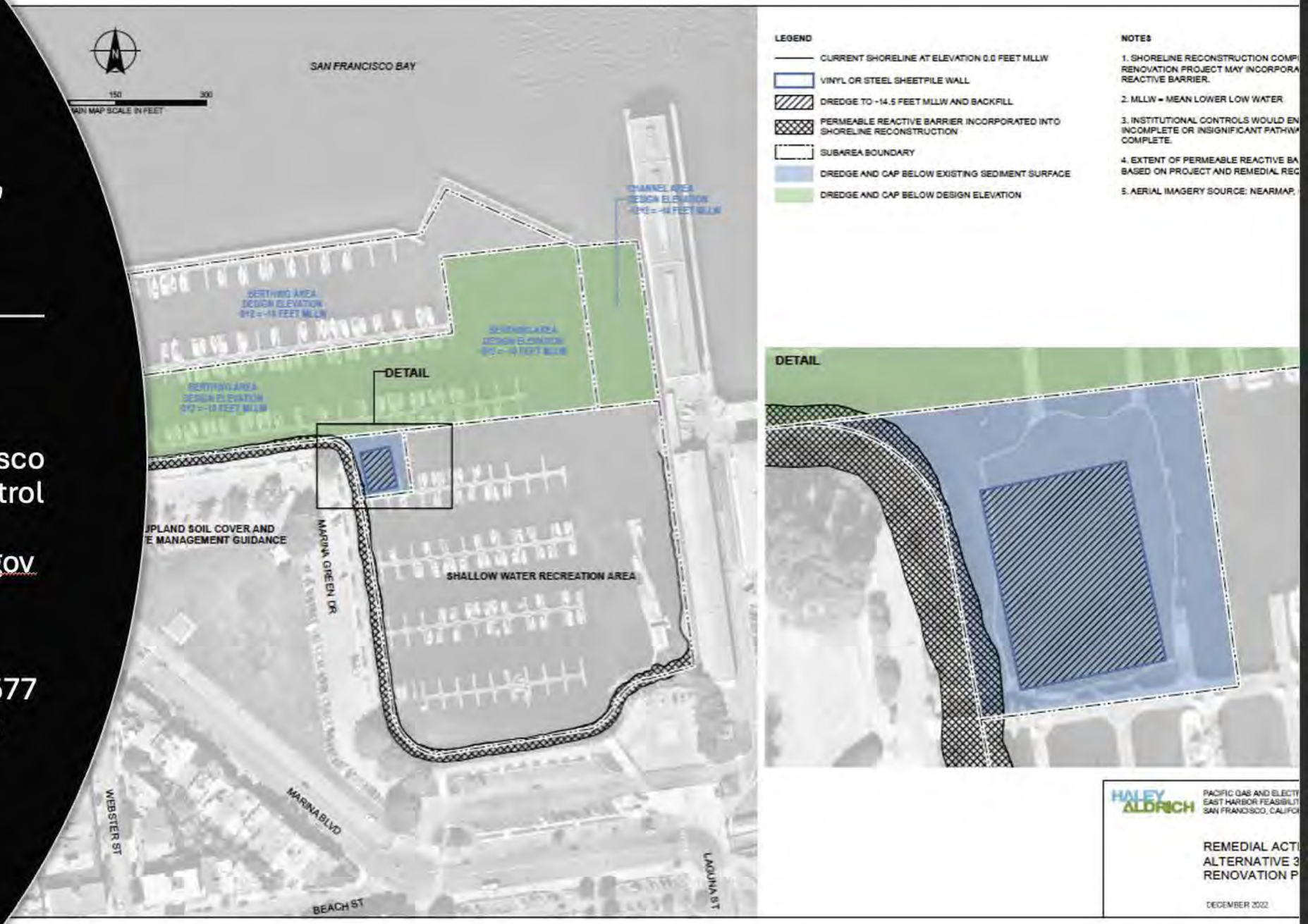
| Alternative | Description | Estimated Cost | Notes |
|---|---|---|---|
| Alt 1 | No Action | $0 | Not compliant with RAOs |
| **Alt 2** | **Rebuild Project (with fuel dock)** | **$66.4M** | High dredging volume and remedial footprint |
| Alt 3 | Renovation Project (fuel dock moved) | ~$55.2M | Preferred: smaller scope, reduced emissions |
| Alt 4 | Maximum feasible sediment removal | ~$94.8M | Longest duration, highest environmental impact |

**2021 East Harbor Feasibility Study**
*Pacific Gas and Electric Company – California*
*File No. 128178-029 (Water Board)*

---

- Angus Chan, P.E. *(he/him)*
Senior Water Resource Control Engineer (Specialist) San Francisco Bay Regional Water Quality Control Board (510) 622-2363
Angus.Chan@Waterboards.ca.gov

- See Figure 27 of the Draft Feasibility Study (page 186 of 1577 of PDF) for the correct depiction



Official website of the State of California

San Francisco Bay Conservation and Development Commission

Rowan Yelton
Coastal Program Analyst
Bay Conservation and Development Commission
and Development Commission Yelton
rowan.yelton@bcdc.ca.gov

BCDC meeting 1-2025 Transcript

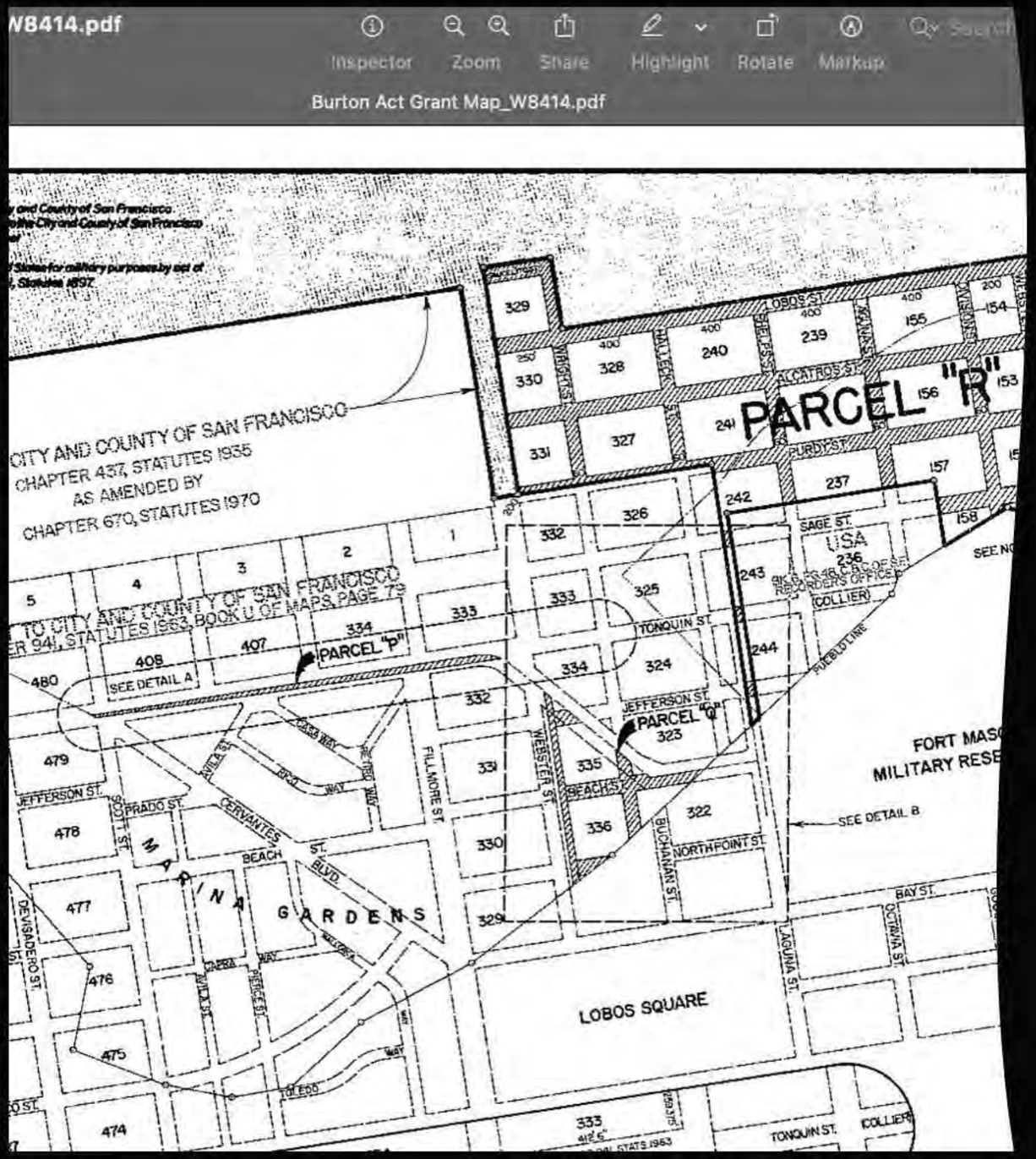
**Monica Scott SFRP:**

***"The fuel dock, we had analyzed keeping it in its existing location. The cost of that would be about $20 to $25 million. So that one had a clear economic financial reason for why we could not keep it there."***

**"In April 2025, SFRP submitted a permit request to San Francisco Planning, stating that the action is a regulatory requirement due to the need to decommission the SF Fuel Dock."**

Existing fuel dock and tanks to be decommissioned and removed to be compatible with remediation design and regulatory requirements. Fuel tanks would be removed or abandoned per regulatory requirements.

Which environmental or safety regulations are driving the decommissioning?




**City of San Francisco BUDGET FORM 1A: Summary of Major Changes**

**FY 2024-25 and FY 2025-26 DEPARTMENT SF Recreation and Park**

**13. Move the Marina Yacht Harbor, Golf Courses, and Camp Mather to a self-sustaining enterprise model.**

**Public trust**

**Public trust use** laid out by California in **Chapter 437 (1935).**

**Key Provision in Public Trust Gashouse Cove is in.**

**"Said real property shall be used solely for aquatic, recreational, boulevard, park and playground purposes."**
This is followed by a narrowly-defined exception:

**"Provided, however, that said City and County of San Francisco shall have power to set apart and assign, or lease, any of said property... for a period not to exceed ten years, to any corporation, club or association organized for the purpose of developing and promoting aquatic sport... provided, that no part... shall be leased to any... association the object of which is pecuniary profit."**

**"lot and Block Number that have sold by SF in 1850"**
and mentions:
**"parcel 'R'"**
**Parcel "R"** of a state land grant.

| See Figure 27 of the Draft Feasibility Study (page 186 of 1577 of PDF) for the correct depiction | Maggie Hallahan Questions June 9th, 2025 | Angus Chan, P.E. *(he/him)* Senior Water Resource Control Engineer (Specialist) San Francisco Bay Regional Water Quality Control Board (510) 622-2363 Angus.Chan@Waterboards.ca.gov |
|---|---|---|
| | Question Gashosue Cove Marina | Answer |
| **Adding to the exciting plan** | | |
| Marine Pool Inclusion | If supported by the City, could PG&E incorporate a marine pool at the Point into the current plan? | Yes, we believe that is possible. A new feasibility study likely would not be needed, but an addendum might be necessary if significant changes to the remediation were needed. |
| **Keeping a Fuel Dock at Gashouse** | | |
| Fuel Dock Depth Retention | Could the fuel dock remain at an eight-foot depth? | Yes, this depth would not expose the contamination in deeper sediment. |
| Fuel Dock Dredge Depth | What is the current or planned dredge depth at the fuel dock area? | The current depth is 8 feet. The plan is to fill and cap the area, but it could also be capped at a lower depth. |
| Fuel Dock Relocation Approval | If the fuel dock were relocated 168 meters forward, would the Water Board object? | No. We assume that permanent relocation of the fuel dock would be after remediation (i.e., the relocation would not prevent access for remediation). |
| Southern Blue Rectangle Area | How deep will the small blue rectangular area near Marina Green Drive (as seen in Figure 27, page 186 of the Draft Feasibility Study) be dredged? This area blue color-coded | The current plan is to dredge to at least 14.5 feet in the Interim Remedial Measure area. If MGP contamination is still present above cleanup levels at 14.5 feet, PG&E may continue dredging to the extent feasible. |
| Unmarked Southern Area | Regarding the southern portion of the site that does not have a color on the graph and was said to "not be touched" — does this mean it will be dredged only 2 feet and then capped, maintaining the same final depth? | That area, referred to as the shallow water basin the Draft Feasibility Study, will not be dredged and capped for remediation. Naturally accumulated sediment is effectively working as a cap over the MGP contaminated sediments. The plan is to continue to rely on this existing sediment cover. |
| **Post Project** | | |
| Cap Integrity and Boat Traffic | After project completion, could a boat break the cap by running into it? | No, it is not likely if the cap is maintained. |
| Future Liability After Transfer | After the property transfer, who will be legally and financially responsible for any future environmental issues? | Both PG&E and RPD will remain liable for MGP contamination. PG&E cannot transfer its liability. |
| Municipal Liability Norms | Is it standard practice for a municipality like San Francisco to assume liability following remediation by a private entity? | The Water Code allows the Board to hold the current property owner liable (the City), but this does not absolve PG&E of its liability for MGP waste discharge. |
| Post-Remediation Dredging | Can dredging occur in the future in the shallow area or any area after the project is completed? | Yes. |
| Post-Remediation Monitoring | Who will be responsible for monitoring the site for residual MGP contamination after remediation, and for how long? | Both PG&E and RPD are responsible. PG&E is taking the lead, including post-remediation verification monitoring. PG&E would implement the remediation over ~2 years; RPD would then complete the Marina Improvement Project. |
| Remedial Plan Timeline | When does the Water Board expect PG&E to submit the final Remedial Action Plan? | We expect PG&E to submit a Draft Remedial Action Plan later this summer or fall. The Water Board will review the document and likely issue comments. After resolving comments, a Final Plan would be submitted (likely in 2026) following public review. |

November 18th, 2025

San Francisco Recreation and Park Department
McLaren Lodge, Golden Gate Park
501 Stanyan Street
San Francisco, CA 94117

Attn: Recreation and Park Commission

**Re: Community Support for Maintaining Gashouse Cove Marina, San Francisco's Gas and Diesel Fuel Dock Operations**

Dear Commissioners:

We write as members and representatives of San Francisco's maritime and waterfront community—environmental advocates, swimmers, rowers, and youth maritime educators—to express our strong support for maintaining the Gashouse Cove gas and diesel fuel dock as part of the Marina Improvement and Remediation Project. This facility serves as critical infrastructure not only for emergency services, but for recreational access, maritime safety, and the preservation of San Francisco's 175-year maritime heritage.

**Critical Maritime Infrastructure**

The Gashouse Cove fuel dock is the only public fueling facility remaining on the San Francisco waterfront. It serves a diverse community of users including recreational boaters, commercial vessels, emergency responders, maritime youth programs, and visiting vessels from around the Bay and beyond. This facility includes not only fuel pumps, but also a pump-out station, oil spill response capabilities, and serves as an emergency extraction point for disabled vessels.

The loss of this facility would force all vessel operators—from the U.S. Coast Guard to Sea Scout training vessels—to transit to Sausalito or Emeryville for fuel. This represents not merely an inconvenience, but a fundamental threat to maritime safety and Bay access. During emergencies, when the 1989 earthquake recovery demonstrated the critical value of this facility, or during medical evacuations and search-and-rescue operations, every minute matters.

Example — SFPD Marine Unit: In fiscal year 2024–2025, the SFPD Marine Unit used the SF Marina Gashouse Cove Fuel Dock 86 times—70 gasoline and 16 diesel. Gasoline access is especially critical because roughly 80 percent of marine vessels run on gasoline, and unlike diesel, gasoline cannot be delivered by truck over the water.

**Recreational Access and Maritime Community**

San Francisco Bay is one of the world's premier sailing destinations, attracting recreational boaters from across Northern California and beyond. The availability of fuel on the San Francisco waterfront is essential to maintaining this vibrant maritime community. Visiting boaters patronize local marinas, restaurants, and businesses—contributing to San Francisco's economy and maritime culture. Eliminating the city's only fuel dock would effectively discourage recreational boating access to San Francisco, diminishing one of the Bay Area's unique recreational resources.

The Pacific Inter-Club Yacht Association (PICYA), representing over 100 yacht clubs across Northern California, has emphasized that accessible fuel infrastructure is not just convenient—it is essential for safe navigation of San Francisco Bay's sometimes challenging conditions. Boaters should not be forced to undertake risky crossings to distant fuel docks when conditions deteriorate or fuel runs low.

**Youth Maritime Education**

For more than a century, Gashouse Cove has served as a training ground for San Francisco's youth maritime programs. The Sea Scouts, including the Makani Maritime Explorers and the SF Vikings (2023 National Champion Sea Scout Club), depend on this facility for their vessels and training operations. These programs teach young people seamanship, water safety, navigation, environmental stewardship, and leadership—skills that have launched countless maritime careers and built generations of Bay stewards.

The elimination of the fuel dock, boat lift, and associated small-craft berths would effectively end these youth programs' ability to operate from this historic location. This represents an unacceptable loss of opportunity for San Francisco's young people, particularly those from underserved communities who gain access to the Bay through these programs.

**Environmental Stewardship and Practical Considerations**

As environmental advocates, we recognize the importance of remediating the legacy pollution from the historic manufactured gas plant. However, we must also advocate for solutions that maintain public access and avoid creating new environmental or safety hazards.

Critically, the California Regional Water Quality Control Board has confirmed that PG&E's cleanup does not require removal of the fuel dock. The navigational channel to the fuel dock has not been dredged in 35 years, yet maintains a natural depth of 8.5 feet at low tide through regular boat traffic. The State Water Board has confirmed this channel can remain in place and continue to be used without alteration.

We are also deeply concerned about SFRP's proposal to promote swimming and kayaking in waters adjacent to the Laguna Street combined sewer outfall, which occasionally

discharges untreated sewage into the Bay. This outfall has not been adequately disclosed in project materials, and promoting recreation in these waters raises serious public health concerns. The existing maritime uses—which occur on vessels rather than through direct water contact—represent a more appropriate use of waters affected by the sewer outfall.

**Support for Local Maritime Industry**

The fuel dock also serves San Francisco's remaining commercial fishing fleet, charter operators, marine contractors, and other working waterfront users. The Port of San Francisco's current fuel infrastructure is inadequate and unreliable, with the Maxum diesel facility at Fisherman's Wharf out of service and in disrepair. Eliminating Gashouse Cove's fuel dock without a viable replacement would further diminish San Francisco's working waterfront and the maritime jobs that depend on it.

**A Balanced Path Forward**

We urge the Recreation and Park Commission to adopt a balanced approach that accomplishes environmental remediation while preserving maritime access and infrastructure. Specifically, we call on the Commission to:

- **Maintain the fuel dock in its current location** during and after the PG&E remediation, as confirmed feasible by the Regional Water Board
- **Preserve the boat lift and small-craft berthing** that supports youth programs and recreational access
- **Fully disclose the Laguna Street sewer outfall** in all project materials and reconsider promoting water-contact recreation in affected areas
- **Conduct an independent review** of the project's financial assumptions and environmental analysis
- **Engage the maritime community** in developing alternatives that meet both cleanup and access goals

The loss of San Francisco's last fuel dock would represent an irreversible diminishment of public access to the Bay and a betrayal of the California Public Trust Doctrine that requires waterfront lands to be preserved for maritime and public purposes. The existing fuel dock infrastructure—upgraded by the State of California and serving the public effectively for over 60 years—should be preserved as the essential maritime infrastructure that it is.

We stand ready to work collaboratively with SFRP, PG&E, the Regional Water Board, and other stakeholders to achieve both environmental protection and maritime access. These goals are not mutually exclusive, and San Francisco's maritime community deserves solutions that honor both values.

Thank you for your consideration of these critical concerns.

**Respectfully,**

**Steven Welch**
Chair, Golden Gate Area Council Sea Scout Committee; San Francisco small-business owner

**Captain Maggie Hallahan**
Sea Scout Leader; Makani Maritime Explorers Leader; California Boating & Waterways Commissioner *(CA DBW Title represents personal position, not that of the Commission)*

**David Jackson**
Commodore, Pacific Inter-Club Yacht Association, representing over 100 yacht clubs across Northern California.

**Diane Walton**
San Francisco Baykeeper Board Member; Dolphin Swimming Club Board Member

**Erika Gliebe**
South End Rowing Club Board Member; Open Water Swim Coach

**Ian Wren**
Staff Scientist, San Francisco Baykeeper

**Patti Mangan**
Communications Director, South Beach Yacht Club; Producer, Sail Sport Talk; Executive Director, Fillmore Merchants Association; PICYA Staff Commodore

**Paul Lanzi**
Golden Gate District Commissioner, Scouting America

**Christiana Hoffman Inesi**
Sea Scout Leader, Makani Maritime Explorers Leader

**Captain Kate Thompson, R.N.**
USCG 50-Ton Master; Sailboat Captain; Registered Nurse

**Captain Kenneth Billiet-Shupe**
Skipper, Sea Scout Ship *Sea Fox*; Golden Gate Area Council, Scouting America

**Michael Schuck**
Parent of Sea Scout and Makani Youth

**Sabryna Holloway**
Parent of Sea Scout and Makani Youth

**Walter Howe**
Parent of Makani Youth

**Justin Disney**
Parent of Sea Scout and Makani Youth

**Corrina M. Rice**
Parent of Sea Scout Makani Youth

**Sam McMillan**
Grandparent of two Sea Scout Makani Youth

Pearci “PJ” Bastiany III
Sea Scout Makani Volunteer

**Matt Leffers**
Dolphin Swimming and Boating Club Member

**Jeffery Tong**
Dolphin Swimming and Boating Club Member

**Stuart Ganna**
Dolphin Swimming and Boating Club Member

**Chapte Ian**
Dolphin Swimming and Boating Club Member

**James Dilworth**
Dolphin Swimming and Boating Club Member

**John Robel**
Dolphin Swimming and Boating Club Member

**Sharon Wong**
Dolphin Swimming and Boating Club Member

**Janne Corn**
Dolphin Swimming and Boating Club Member

**William Kashner**
Dolphin Swimming and Boating Club Member

**Ken Corgn**
Dolphin Swimming and Boating Club Member

**From:** Board of Supervisors (BOS)
**To:** BOS-Supervisors; BOS-Legislative Aides
**Cc:** BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS)
**Subject:** FW: 19th / sunset dunes / density and yet no transit west side plans shovel ready with money and connectivity between districts
**Date:** Thursday, December 4, 2025 9:05:08 AM

Hello,

Please see below communication regarding the 19th Avenue repaving project.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

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**From:** Aaron Goodman <amgodman@yahoo.com>
**Sent:** Saturday, November 29, 2025 3:51 PM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; cac@sfcta.org; cac@sfmta.com; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; mayordaniellurie@sfgov.org
**Subject:** 19th / sunset dunes / density and yet no transit west side plans shovel ready with money and connectivity between districts

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

The stupidity of politicians and developments and lacking forward thinking of transit agencies is unbelievable....

Where's the solutions around the city!??

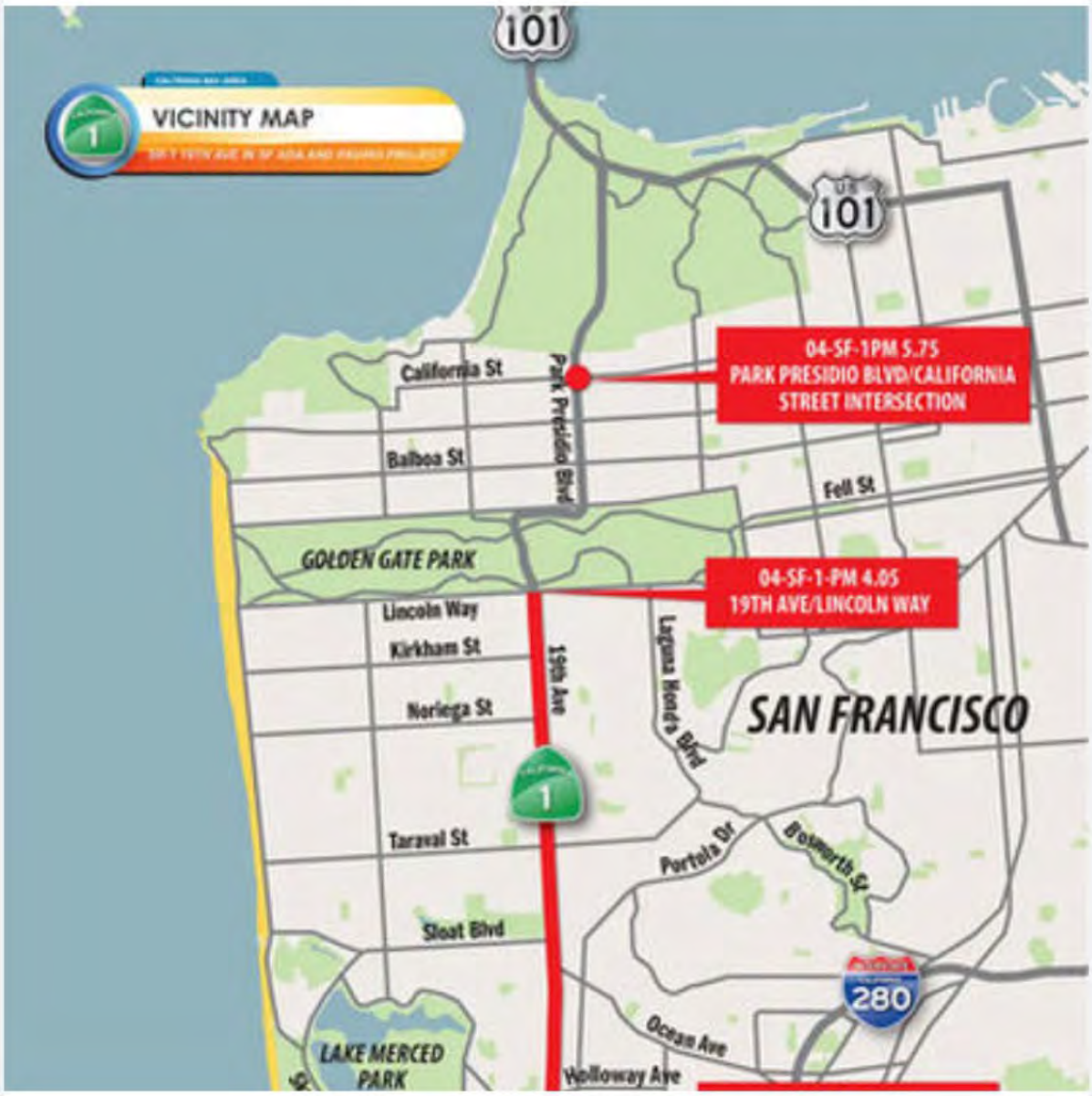
Where's the ???

Cc please Land Use and Planning commissioners all of them...and the mayor

The stupidity is beyond belief.... Solve the bigger transit issues or stop the density bullshit...

Ag D7

19th avenue repaving project. To all the people that voted to close the Great highway. Here comes the additional pain. The minimum year-long 19th avenue repaving project. Adding to the massive increase of cars that drive down all the streets above Sunset to the beach everyday that use to go down the Great highway.




Sent from my iPhone

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: 120 Stockton Street (2020-011001OFA) |
| **Date:** | Thursday, December 4, 2025 9:13:03 AM |

Hello,

Please see below communication regarding a project at 120 Stockton Street.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

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**From:** Michael Nulty <sf_district6@yahoo.com>
**Sent:** Tuesday, December 2, 2025 12:49 AM
**To:** Vimr, Jonathan (CPC) <Jonathan.Vimr@sfgov.org>
**Cc:** tcatalano@reubenlaw.com
**Subject:** 120 Stockton Street (2020-011001OFA)

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

December 2, 2025
San Francisco Planning Department

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Re: Letter of Support – Office Development Allocation Proposal
120 Stockton Street (at O'Farrell Street) – Addition of Office Space

Dear Members of the Planning Commission and Planning Department Staff,

We are writing to express my strong support for the proposed Office Development Allocation for the project at 120 Stockton Street at the corner of O'Farrell Street, which seeks authorization to add approximately 111,660 square feet of new office space to the existing building in San Francisco's Downtown/Central SoMa area.

This project represents a responsible and much-needed expansion of high-quality office space in the heart of San Francisco at a time when the city is working aggressively to retain and attract employers, stabilize its commercial base, and revitalize the Mid-Market/Union Square corridor. Key reasons for my enthusiastic support include:

1. Economic Recovery and Job Creation
   The addition of modern, flexible office space at 120 Stockton will enable growing companies—particularly in technology, professional services, creative industries, and startup ecosystems—to remain in or return to San Francisco, creating hundreds of direct, high-wage jobs and thousands of indirect jobs in surrounding businesses.
2. Strategic Location and Transit Access
   The site sits directly above the Powell Street BART/Muni station and is served by multiple bus lines, cable cars, and regional transit connections. Adding office space here leverages the city's strongest transit node, minimizes additional vehicle trips, and fully aligns with San Francisco's Transit-First policy and the goals of Proposition M and the Central SoMa Plan.
3. Activation of Union Square and Mid-Market
   More office workers during the day will directly support ground-floor retail, restaurants, cultural institutions, and performing arts venues along Stockton, Market, and Powell Streets—helping to reverse recent vacancy trends and restore vibrancy to one of the city's most important commercial districts.
4. Sustainable and High-Quality Design
   The proponent has committed to public realm improvements, etc. ensuring the project meets or exceeds San Francisco's rigorous sustainability and urban design standards.

5. Responsible Use of the Office Allocation Pipeline
   Approving this allocation will utilize a portion of the remaining Proposition M office allotment in a location that maximizes public benefit and minimizes community impacts—precisely the type of project the annual limit was intended to prioritize.

For all of these reasons, the Alliance for a Better District 6 respectfully urges the Planning Commission and Planning Department to approve the requested Office Development Allocation for 120 Stockton Street without delay. This project is exactly the kind of well-located, job-generating, transit-oriented development San Francisco needs to strengthen its economic foundation and ensure a vibrant future downtown.

Please do not hesitate to contact me if we can provide any additional information or clarification.

Sincerely,

Michael NultyExecutive Director Alliance for a Better District 6


## *Michael Nulty*

P.O. Box 420782
San Francisco, CA 94142-0782
(415) 339-8327 - Direct
(415) 339-8779 - Alliance for a Better District 6
(415) 339-8683 - Central City Democrats
(415) 937-1289 - North of Market Business Association
(415) 820-1412 - Tenderloin Futures Collaborative
http://abd6.cfsites.org/

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: JFK drive |
| **Date:** | Thursday, December 4, 2025 9:01:23 AM |

Hello,

Please see below communication regarding John F. Kennedy Drive.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** GREG PAUXTIS, M.D. <GREG.PAUXTISMD.493128878@p2a.co>
**Sent:** Thursday, November 27, 2025 2:38 AM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** JFK drive

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

Dear Board of Supervisors,

A compromise for John F. Kennedy Drive was reached in 2007 that allowed all users of

Golden Gate Park to share the roads. It is time to reopen JFK Drive back to the way it was before COVID. The select few that are the most vocal are doing us all a disservice that want a reasonable compromise.

Please reopen JFK Drive like it was before COVID!

Regards,
GREG PAUXTIS, M.D.
San Francisco, CA 94115

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Stopping Attack on Tenants |
| **Date:** | Thursday, December 4, 2025 9:10:56 AM |

Hello,

Please see below communication regarding the Commission Streamlining Task Force.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** Randy Shaw <randy@thclinic.org>
**Sent:** Monday, December 1, 2025 10:48 AM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** Stopping Attack on Tenants

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

Dear Supervisor,

Please see my story opposing the Streamlining Committee's efforts to eliminate the Building Inspection Commission. The BIC is the city's most helpful agency for tenants. The Board must oppose this effort. See https://beyondchron.org/streamlining-committee-targets-san-francisco-tenants/

Randy Shaw
Director, Tenderloin Housing Clinic
Editor, https://beyondchron.org/
Author of the new and updated, The Tenderloin: Sex, Crime and Resistance in the Heart of San Francisco

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| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Take Action to End Prostitution Ravaging Streets in the Mission |
| **Date:** | Thursday, December 4, 2025 9:09:44 AM |

Hello,

Please see below communication regarding sex workers in the Mission.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** Adrienne Hoyer <noreply@jotform.com>
**Sent:** Monday, December 1, 2025 11:37 AM
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; FielderStaff <FielderStaff@sfgov.org>; Lurie, Daniel (MYR) <daniel.lurie@sfgov.org>; Fielder, Jackie (BOS) <Jackie.Fielder@sfgov.org>; Perdomo, Sean (POL) <sean.perdomo@sfgov.org>; Yep, Paul (POL) <Paul.Yep@sfgov.org>; SFPD Mission Station, (POL) <sfpdmissionstation@sfgov.org>; SFPD, Chief (POL) <sfpdchief@sfgov.org>
**Subject:** Take Action to End Prostitution Ravaging Streets in the Mission

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

Message to the Board of Supervisors,

Mayor, and the City Attorney

| | |
|---|---|
| From your constituent | Adrienne Hoyer |
| Email | amhoyer@sbcglobal.net |
| Subject | Take Action to End Prostitution Ravaging Streets in the Mission |
| Message: | Dear Supervisor Fielder, |

Mission residents urge you to take decisive action to stop illegal prostitution from degrading the quality of life along Shotwell Street and nearby neighborhoods. So far, the City's half-measures have merely shifted the problem from one street to another. That is not a solution. While you've expressed sympathy for the women being exploited on our streets, your constituents also deserve your sympathy—and your commitment—to end the sex trade in front of our homes, schools, parks and businesses.

Prostitution is not a victimless crime—families are forced to live with constant unsafe traffic, discarded syringes and condoms, and lewd acts in plain sight. It is unconscionable that we have endured years of trauma under supervisors who, through dysfunction or disregard, have failed their constituents. We demand a comprehensive, sustained strategy that uses every available tool and coordination across all relevant agencies to protect Mission residents and businesses from the harm of unchecked sex trafficking on our streets.

Specifically:
Community–law enforcement cooperation: Build stronger partnerships between residents and SFPD to ensure accountability and shared responsibility.
Real accountability: Measure success by concrete outcomes—such as reduced street prostitution and improved neighborhood safety—not by hours logged or nonprofits funded.
Increased enforcement: Strengthen police presence and employ targeted interventions against traffickers and sex buyers.
Expanded investigative tools: Authorize SFPD to use phone-tapping powers already permitted in human trafficking cases and proven effective in other jurisdictions, impounding the cars of johns, and sending 'Dear John' letters to their homes.
Technology partnerships: Collaborate with tech companies to create tools and apps that support law enforcement and victim services.
We ask that you commit to using every law and every tool available—without delay—to restore

safety and livability to our community and put an end to illegal sex-trafficking and prostitution in the Mission.

Sincerely,

cc: Mayor Lurie, Interim Chief Yep, Mission Police Captain, DA's office

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Carroll, John (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Whistleblower Report: DPW admits to ignoring Land Use Ordinance 001-22 for 4 years |
| **Date:** | Thursday, December 4, 2025 10:57:28 AM |

Hello,

Please see below communication regarding **File No. 250836:**

Ordinance amending the Public Works Code to require the Department of Public Works to plant replacement Street Trees within 120 days of removal, require that Street Trees removed without a permit be replaced by Street Trees of equal size, require that Tree protection plans include the applicant's acknowledgement of potential Tree replacement costs, and set maximum administrative penalties for removing or injuring Street Trees; and affirming the Planning Department's determination under the California Environmental Quality Act.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** Grant Review <grant.review@proton.me>
**Sent:** Thursday, December 4, 2025 10:43 AM
**To:** Melgar, Myrna (BOS) <myrna.melgar@sfgov.org>; Mandelman, Rafael (BOS) <rafael.mandelman@sfgov.org>

**Cc:** Carroll, John (BOS) <john.carroll@sfgov.org>; MandelmanStaff (BOS) <mandelmanstaff@sfgov.org>; MelgarStaff (BOS) <melgarstaff@sfgov.org>; Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** Re: Whistleblower Report: DPW admits to ignoring Land Use Ordinance 001-22 for 4 years

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

Supervisors,

I am following up on my email from November 25 regarding Public Works' refusal to comply with your tree replacement legislation (Ordinance 001-22). I recognize this correspondence likely arrived as your offices were preparing for the Thanksgiving recess, but the issue requires your immediate attention.

This is a clear-cut case of legislative contempt. Public Works knew about this requirement in 2021 (as shown in the attached 2023 records request) but admitted they have not generated the report. They also lied to the Sunshine Task Force last month, claiming the law was "relatively new" to excuse their inaction.

This is not a clerical error; it is a department ignoring the Board's authority and misleading the public to cover it up.

Can the Clerk confirm receipt of this message? I request a response: Will the Land Use Committee call for a hearing or an inquiry into this failure?

On Tuesday, November 25th, 2025 at 8:08 AM, Grant Review <grant.review@proton.me> wrote:

> Supervisors,
>
> Supplementing my previous email: I have uncovered a public record (Sunshine Request 23-2758, attached) proving that DPW Custodian David Steinberg personally processed a formal request for this exact mandated report in June 2023.
>
> The request explicitly cited Public Works Code Section 806(a)(6)(C). In his official response 29 months ago, Mr. Steinberg admitted that no such records existed.

This documentary evidence directly contradicts his statement that the requirement is "relatively new" or that the Department was unaware. DPW has been on notice regarding this specific legislative mandate for years and has **knowingly** remained in violation, ignoring the laws passed by the Board of Supervisors.

On Wednesday, November 19th, 2025 at 8:38 PM, Grant Review <grant.review@proton.me> wrote:

> Honorable Chair Melgar and Supervisor Mandelman,
>
> I am writing to you regarding Ordinance No. 001-22 (File No. 210836), legislation both of you sponsored and shepherded through the Land Use Committee to mandate timely street tree replacement. It was passed unanimously by the Board of Supervisors.
>
> In a sworn response to the Sunshine Ordinance Task Force filed yesterday (File No. 25099), Public Works Custodian David Steinberg admitted that the department has "not yet produced" the "Delayed Replacement Tree Report" mandated ("The Department shall record") by your legislation.
>
> To justify this failure, Mr. Steinberg claimed in writing that this law, which was enacted in January 2022, is a "relatively new addition to the Public Works Code."
>
> This is a formal admission that Public Works has been in violation of Section 806(a)(6)(C) of the Public Works Code for nearly four years.
>
> They are not tracking the data you legally mandated them to track.
>
> They are concealing this failure from the public until forced to admit it in legal proceedings.
>
> This failure is Citywide, meaning there is no accountability for whether trees removed anywhere in San Francisco are being replaced within the mandated 120 days, or even tracked for replacement after that.
>
> I have attached the DPW admission and the legislative history proving Mr. Steinberg was personally notified of this law in 2021.
>
> As Chair of the Land Use Committee and Sponsor of the legislation, I urge you to call for an inquiry into why the Department has ignored your legislative mandate for nearly half a decade. What is the point of legislating and passing laws if they are simply ignored by city departments?
>
> Attachments:

Original Sunshine Request

- DPW Response to SOTF (Admitting report does not exist, attached)

- 2021 Land Use Committee Memo (Showing DPW notification)

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Anonymous Feedback Regarding HCSO – Request for Policy Review |
| **Date:** | Wednesday, November 26, 2025 8:18:22 AM |

Hello,

Please see below communication regarding Labor and Employment Code, Article 21: San Francisco Health Care Security Ordinance.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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-----Original Message-----
From: Chris Ramirez <crasfo1125@gmail.com>
Sent: Tuesday, November 25, 2025 3:39 PM
To: Mandelman, Rafael (BOS) <rafael.mandelman@sfgov.org>; erika.major@sfgov.org
Cc: Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; Mayor, MYR (MYR) <mayor@sfgov.org>
Subject: Anonymous Feedback Regarding HCSO – Request for Policy Review

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

I am writing to request that the City review and modernize key elements of the Health Care Security Ordinance (HCSO).

While the ordinance is well-intended, certain structural features prevent contributions from directly benefiting employees and place disproportionate strain on small, labor-intensive businesses.

Two updates—revising how employer size is defined and allowing revocable HRAs as a compliance method—would significantly improve fairness and effectiveness.

Key points:

• The current definition of “large employer” is based solely on headcount, not revenue or financial capacity. Labor-intensive businesses often employ many workers but operate with slim margins, resulting in a disproportionate and unsustainable cost burden that does not reflect true economic scale.

• Many employees already have Medi-Cal, Medicare, or employer-sponsored insurance and incur no or little medical expenses during the year. Employer contributions on their behalf often remain unused and eventually revert to the City, meaning the current structure does not ensure contributions directly support employee health needs.

• The HCSO allows only irrevocable HRAs for compliance, which forces employers to pre-fund accounts even when employees have no medical expenses. Allowing revocable HRAs—where funds are contributed only when an employee actually needs them—would ensure contributions serve their intended purpose, reduce waste, and modernize the ordinance while maintaining strong protections for workers.

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Golden Gate Park Concerts |
| **Date:** | Monday, December 1, 2025 8:17:24 AM |
| **Attachments:** | Letter Supporting Save SF Parks.docx |

Hello,

Please see attached and below communication regarding concerts in the Golden Gate Park.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** Jean Barish <jeanbbarish@hotmail.com>
**Sent:** Sunday, November 30, 2025 9:51 PM
**To:** Commission, Recpark (REC) <recpark.commission@sfgov.org>
**Cc:** Lurie, Daniel (MYR) <daniel.lurie@sfgov.org>; Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** Golden Gate Park Concerts

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

Dear Commissioners,

Please see the attached letter from Planning Association for the Richmond (PAR) urging the Recreation and Park Commission to require full public review and approval of all new large-scale, ticketed concerts in Golden Gate Park.

Thank you for your consideration of this issue.

*Jean*

*Jean B Barish*
*jeanbbarish@hotmail.com*
*President, Planning Association for the Richmond*

December 1, 2025

San Francisco Recreation and Park Commission
501 Stanyan Street
San Francisco, CA 94117

Dear Commissioners,

I am writing on behalf of Planning Association for the Richmond (PAR). We urge the Recreation and Park Commission to require full public review and approval of all new large-scale, ticketed concerts in Golden Gate Park.

Golden Gate Park is a public treasure, not a revenue stream. Yet in recent years, it has increasingly been treated as a venue for private profit, with weeks-long closures for concerts like Outside Lands, Dead & Co., and recently, a ticketed concert in Robin Williams Meadows on October 11. These closures have real consequences: they limit resident access and damage park ecosystems.

In addition, community impacts of these concerts are growing. Concerts that run until 10 p.m. create noise and congestion well into the night, making it difficult for neighbors to leave or reach their homes and for nearby small businesses to operate.

These decisions are being made without adequate public oversight. The Commission and community often learn about new events only after permits are issued. To restore transparency and accountability, we respectfully ask the Commission to ask the Recreation and Park Department for **a full list** of all proposed ticketed concerts and large-scale events in Golden Gate Park and **require Commission approval** before new events are permitted.

San Franciscans deserve a voice in how their parks are used. Golden Gate Park was created as a refuge for all San Franciscans — not as a profit center for private interests. With thoughtful oversight and open dialogue, the Commission can ensure that this legacy endures.

Thank you for your leadership and for considering this request. We look forward to continuing to work together to protect and preserve our city's public spaces for generations to come.

Sincerely,
*Jean Barish*
Jean B Barish, President Planning Association for the Richmond

cc: Mayor Daniel Lurie; San Francisco Board of Supervisors

5758 Geary Blvd., #356 San Francisco, CA 94121-9804
415-541-5652 Voicemail
sfparpresident@gmail.com

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 2 Letters Regarding Sunset Dunes |
| **Date:** | Thursday, December 4, 2025 12:25:06 PM |
| **Attachments:** | 2 Letters Regarding Sunset Dunes.pdf |

Hello,

Please see attached 2 letters regarding Sunset Dunes.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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| | |
|---|---|
| **From:** | Elizabeth Porter |
| **To:** | Lurie, Daniel (MYR); Chan, Connie (BOS); Chen, Chyanne (BOS); Dorsey, Matt (BOS); Engardio, Joel (BOS); Fielder, Jackie (BOS); Sauter, Danny (BOS); Sherrill, Stephen (BOS); Mahmood, Bilal (BOS); Melgar, Myrna (BOS); Mandelman, Rafael (BOS); Walton, Shamann (BOS) |
| **Cc:** | Board of Supervisors (BOS) |
| **Subject:** | I love Sunset Dunes |
| **Date:** | Thursday, December 4, 2025 10:03:09 AM |

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

Dear Mayor Lurie and Board of Supervisors,

I have chosen to share my feelings without using a template. The issue of the Sunset Dunes has already been explained in depth so I will stick with my personal feelings and experiences as a long-time Parkside resident.
I raised a large family in this district and most of them became surfers as well as participants in many other sports. We have utilized and loved the Outer Sunset neighborhoods for 40+ years and have been keen observers of the changes in and struggles of the area.
The closure to car traffic has been a resounding positive for my family and neighbors. I walk on outer Noriega daily and can see and feel the difference in the retail and community spaces. My adult son lives with his wife on 47th and they say that the neighborhood feels like a “beach town” for the first time ever. More people walking about, enjoying the outdoor spaces, gathering intentionally to watch yet another stunning sunset, lining up outside of favorite food establishments. This couple drive a car and have not been negatively impacted in that part of life or by parking on their street.
When my kids were small, they learned to ride bikes in parking lots, school yards (before the catholic schools in the area locked up after hours), or small stretches of any flat, safe-ish streets that we could find. My grandson is one of now many small kids who have learned to ride on the Great Highway, and it has become a family event because we all have access in the same way. He has recently started to use and love the “pump track” at the south end of the park.
In speaking with neighbors, it appears to me that there has continued to be a small but very vocal minority group actively advocating for the re-opening of the GH to cars. These voices seem more concerned with their own personal (anticipated) inconveniences than what is best for our neighbors, our small businesses, our environment and our futures.
Mayor Lurie, I urge you to listen to and respect the will of the voters, both in our neighborhood and across the City.
Supervisors, I urge you to champion the park to deliver the will of the 206,000 voters: a coastal park that will welcome San Franciscans and our visitors to enjoy our coastline for generations to come.

Thank you for your leadership.
Sincerely,
Elizabeth Porter
415-290-0271

| | |
|---|---|
| **From:** | Amanda Roosa |
| **To:** | Lurie, Daniel (MYR); Chan, Connie (BOS); Chen, Chyanne (BOS); Dorsey, Matt (BOS); Engardio, Joel (BOS); Fielder, Jackie (BOS); Sauter, Danny (BOS); Sherrill, Stephen (BOS); Mahmood, Bilal (BOS); Melgar, Myrna (BOS); Mandelman, Rafael (BOS); Walton, Shamann (BOS) |
| **Cc:** | Board of Supervisors (BOS) |
| **Subject:** | I love Sunset Dunes |
| **Date:** | Thursday, December 4, 2025 10:30:38 AM |

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

Dear Mayor Lurie and Board of Supervisors,

Sunset Dunes has been an incredible success, drawing tens of thousands to enjoy our coast each week. The park has been a boon for Outer Sunset businesses, is an important first step towards rehabilitating our coastal ecosystem, and has connected San Franciscans to the coast more than previously imagined - kids learning to ride bikes, wheelchair users finally able to roll by the sea, elders at free Tai Chi and chair yoga classes, and people of all ages soaking up our City's incredible coastline more than ever before.

As one of the 206,000 San Francisco voters who supported Prop K, I urge you to:
- Be forward-looking and appoint a District 4 Supervisor who will support the future of one of the city's most popular parks
- Champion the future of Sunset Dunes to make it more accessible, welcoming, and enjoyable while increasing revenues for local businesses

Why? Because:
- San Franciscans have already made clear that they want a coastal park. Voters overwhelmingly rejected Prop I in 2022, which would have dedicated the coast to cars. In 2024, voters chose a full-time oceanfront park with a ten point margin of victory. Since the park opened, it has become one of SF's most visited parks, and visitor numbers have only continued to grow.

- Before approving Prop K, voters experienced the promise — and shortcomings — of a weekend road closure. The weekend road closure was incompatible with any park improvements, let alone use of the park on weekdays. A weekend-only road closure would mean removing all park improvements, including seating, picnic tables, fitness equipment, art, and the skate park the neighborhood has quickly come to love. A part-time road closure also precludes any possibility of the necessary dune restoration and sea-level rise protection work. Now that Sunset Dunes has opened, twice as many people come each day as visited during the weekend pilot. San Franciscans did not vote for a closed road; we embraced the vision of a coastal park. Now, voters are counting on their elected leaders to implement that vision, not rehash the issue yet again when it was already debated for five years.

- The southern portion of Great Highway has been slated for permanent closure since the Board of Supervisors adopted the Ocean Beach Master Plan in 2012. The southbound lanes are already closed, with the northbound lanes set for closure imminently as part of the SFPUC's work. Sunset Dunes has lost its primary utility as a road, as traffic patterns needed to shift inland regardless. While change is always challenging, traffic data demonstrates that this shift has been successful and the traffic impacts have been minimal.

San Franciscans voted resoundingly to make Sunset Dunes a full-time oceanfront park, and even more have come to love the park now that it's been opened and had amenities added.

Mayor Lurie, I urge you to appoint a supervisor who is supportive of Sunset Dunes, someone who will bring the community together to solve neighborhood challenges while designing the Outer Sunset's newest park together. Supervisors, I urge you to champion the park to deliver the will of the 206,000 voters: a coastal park that will welcome San Franciscans and our visitors to enjoy our coastline for generations to come.

Thank you for your leadership.

Sent from my iPhone

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | Calvillo, Angela (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS); De Asis, Edward (BOS); BOS-Operations |
| **Subject:** | 50 Letters Regarding Fire Sprinklers |
| **Date:** | Thursday, December 4, 2025 12:34:20 PM |
| **Attachments:** | 50 Letters Regarding Fire Sprinklers.pdf |

Hello,

Please see the attached 50 letters regarding automatic sprinkler systems in existing high-rise buildings

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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| | |
|---|---|
| **From:** | Denise Miura |
| **To:** | Commission, Fire (FIR) |
| **Cc:** | Lurie, Daniel (MYR); Board of Supervisors (BOS) |
| **Subject:** | Fw: Hello Mayor Lurie, |
| **Date:** | Tuesday, November 25, 2025 12:03:57 PM |

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

To the Fire Commission of San Francisco:

I am writing today to make a humble plea to the Fire Commission -- the same urgent appeal I have made to both the San Francisco Mayor's Office and to the San Francisco Board of Supervisors in recent weeks.

My name is Denise Miura, and I represent my mother-in-law Shigeko Miura, who owns unit #1107 of 66 Cleary Court in the Western Addition district of the City. This was my in-laws' home since 1980 until 2013 when Shigeko, who had suffered from dementia since 2010, had to be transferred to an assisted living facility, as her caregiving needs exceeded our capacity to continuing caring for her.

As of 2016, we have been renting out her unit. Residual rent is relatively modest, after paying steadily rising Homeowner Association dues and property taxes, and having to reduce rent significantly in 2020 due to the Covid pandemic. Still, we are vert fortunate and grateful for the income, as it definitely contributes to paying for her expensive care.

I have since learned of the potential for EACH unit of our building to be assessed up to $300,000 to address fire safety measures.  Such expected exorbitant amounts poses a HUGE strain on our ability to pay and will likely force us to sell her unit. After paying the fire safety costs and taxes, any net sum that remains to help pay her continuing caregiving expenses will likely be quickly exhausted. She will no longer have the steady stream of rental income, such as it is.

I wrote last week to request, respectfully, that the Board take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our building on alternative and feasible life safety measures that will protect our residents and visitors.

I understand the fire sprinkler mandate, though well-intentioned, was passed without any notice to or discussion with the affected buildings in the City and places an unreasonable and undue financial hardship on our owners, to say nothing of what will happen to residents, who may lose their homes.

Thank you very much for your attention to helping us keep our properties and homes from exceptionally higher possible expenses...

Stay safe,
Denise Miura
for Shigeko Miura
owner of 66 Cleary Court #1107
San Francisco, CA 94109
Tel (415)200-5116

**From:** JoEllen Dutcher
**To:** Board of Supervisors (BOS)
**Subject:** SF Sprinkler Mandate
**Date:** Tuesday, November 25, 2025 12:38:32 PM

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

Dear SF Board of Supervisors;

I am writing to request you to take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our buildings on other feasible life safety measures that will protect our residents and visitors.

The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings, and places an unreasonable physical and insurmountable financial hardship on our residents.

In short, this mandate will result in hundreds of homeless seniors and average earning residents (myself included) who cannot afford to take on the huge costs associated with this requirement. Most will be forced to sell (and below market rates due to this impending mandate), thus also losing hard earned equity and needed savings for retirement. It is absolutely appalling that the elected officials in San Francisco, a city that was built on principles of community and protecting its residents, would allow a mandate to be passed that has such an extreme impact to our quality of life, and force hundreds to leave a city they have worked so hard to make their home, but can no longer afford to live here due to this mandate.

I implore you to work together with the citizens in these buildings to find another feasible solution that does not create this extreme hardship. We will continue to protest and elevate our cause in the public forum until we come to an agreed solution.

Thank you,
JoEllen Dutcher

| | |
|---|---|
| **From:** | Somusa Ratanarak |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Fire sprinkler mandate -The Summit at 999 Green Street |
| **Date:** | Tuesday, November 25, 2025 2:06:54 PM |

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

*Dear Board of Supervisors:*

*The fire sprinkler mandate was passed without discussion or notice to owners of the affected buildings. I was shocked to learn of the expenses and time involved which would cause undue hardship on my family. I am writing to request that you take action to amend the said mandate and work with our buildings to find feasible life safety measure that will protect residents and visitors.*

We are not in a position to come up with the expenses and will not be able to sell the unit or relocate. Further, our ceiling will drop to 7' which does not meet code.

Sincerely,

somusa

| | |
|---|---|
| **From:** | Claudia Juestel |
| **To:** | Board of Supervisors (BOS) |
| **Cc:** | Ian Bevilacqua |
| **Subject:** | SFFD Sprinkler Ordinance |
| **Date:** | Tuesday, November 25, 2025 2:46:42 PM |

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

To the Honorable Members of the Board of Supervisors:

I write to ask that you not require older residential high-rise buildings in San Francisco to undergo radical retrofitting in order to install sprinkler systems in all units.

I'm confident that governing bodies of buildings potentially affected by this proposed mandate would work cooperatively with the City to establish alternative, effective, fire-prevention measures. That would be a win-win: the City would improve community safety standards and landowners would improve their property (and avoid having to destroy it in the process).

As it looks now, the proposed sprinkler mandate will affect 126 buildings around the City and will cause residents to have to vacate our homes and relocate elsewhere during multiple months of renovations. As you know, housing is already scarce and expensive in the City, and displacement of hundreds of City residents will cause disruption and increased expense to the entire community, not just those personally dislocated.

In addition to the displacement issue and the lack of realistic necessity for the mandate, the costs to hundreds of SF residents may prove ruinous. Not everyone who owns a condo or coop in the City is wealthy. Many older owners rely on fixed incomes that may already be stretched thin. The proposed sprinkler retrofitting is estimated to cost approximately $200,000 - $300,000 per unit over a nine-year period. This may come in the form of greatly increased monthly assessments, or special assessments to be paid in less than monthly installments.

No matter the ultimate installment plan for each building, a City-mandated individual household expenditure of that amount, about which owners never had a chance to negotiate or vote, would be onerous.

In sum, the sprinkler mandate is (1) not supported by evidence-based necessity, (2) prohibitively costly for many people, and (3) significantly disruptive to the overall City community.

Please reconsider this plan and work instead with the affected buildings to find viable alternative fire safety measures.

Thank you for your consideration.

Sincerely,

Claudia Juestel
Principal
ADEENI DESIGN GROUP
391 Sutter Street, Suite 400
San Francisco, CA 94108
T (415) 928-4685
**AdeeniDesignGroup**

Chairish • Houzz • Instagram • Pinterest

| | |
|---|---|
| **From:** | John Merten |
| **To:** | Lurie, Daniel (MYR); Commission, Fire (FIR); Board of Supervisors (BOS) |
| **Subject:** | Fwd: Opposition to Sprinkler System Requirements in Older-High-Rise Buildings Such As (Fontana East) |
| **Date:** | Tuesday, November 25, 2025 4:02:31 PM |

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

Board of Supervisors and City Leaders:

Please. Please!! use common sense here. My wife and I are just about to retire into a condo we bought in San Francisco. The building is the Fontana East and it is a well built concrete and steel structure from the mid 1960's. This building has no record of fire that we are aware of and we feel that forcing the implementation of a sprinkler system is too invasive, expensive and likely of no benefit. Further it may cause problems? Weaken structures or leak and damage the structure?

We spend a tremendous amount of money to get ourselves into this building. The monthly costs are more than many people's mortgages and now we might be hit with a huge additional cost. It is unacceptable and such a hardship.

This is the sort of thing people and the media talk about when they think of San Francisco. No limit to the public sector's overreach and push into people's lives in ways that go too far.

I do not think this new sprinkler requirement should be a "one size fits all" proposition. There may be some older wood framed structures that are in fact dangerous but an all reinforced concrete structure as we recently purchased is just not likely to burn.

Thank you for considering this and taking my serious concerns into account.

**JOHN MERTEN**

Studio Green

**LANDSCAPE ARCHITECTURE I SITE PLANNING**
232 SIR FRANCIS DRAKE BLVD
SAN ANSELMO, CA 94960
415 721 0905
www.studiogreen.com

---------- Forwarded message ---------
From: **John Merten** <john@studiogreen.com>
Date: Thu, Nov 20, 2025 at 4:28 PM
Subject: Opposition to Sprinkler System Requirements in Older-High-Rise Buildings Such As (Fontana East)
To: <Board.of.Supervisors@sfgov.org>

Board of Supervisors and City Leaders:

Please. Please!! use common sense here. My wife and I are just about to retire into a condo we bought in San Francisco. The building is the Fontana East and it is a well built concrete and steel structure from the mid 1960's. This building has no record of fire that we are aware of and we feel that forcing the implementation of a sprinkler system is too invasive, expensive and likely of no benefit.

We spend a tremendous amount of money to get ourselves into this building. The monthly costs are more than many people's mortgages and now we might be hit with a huge additional cost. It is unacceptable and such a hardship.

This is the sort of thing people and the media talk about when they think of San Francisco. No limit to the public sector's overreach and push into people's lives.

I do not think this new sprinkler requirement should be a "one size fits all" proposition. There may be some older wood framed structures that are in fact dangerous but an all reinforced concrete structure as we recently purchased is just not likely to burn.

Thank you for considering this and taking my serious concerns into account.

**JOHN MERTEN**

Studio Green

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SAN ANSELMO, CA 94960
415 721 0905
www.studiogreen.com

**From:** Kenji Kawakami
**To:** Board of Supervisors (BOS)
**Subject:** kenji kawakami FontanaEast#303 1000NorthPoint SF
**Date:** Tuesday, November 25, 2025 4:04:55 PM

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

iPhoneから送信I have been living in this Fontana for more than 35 years called Kawakami.
And now I'm 65 years old and I'm living a retired life.
I disagree with this sprinkler. Because I can't pay any more burden of HOA in my retirement life. I absolutely oppose the mandatory installation of sprinklers.

**From:** Darwin Shu
**To:** Board of Supervisors (BOS)
**Subject:** Objection to Fire Sprinklers Mandate
**Date:** Wednesday, November 26, 2025 8:53:34 AM

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

Subject: Request to re-examine to Fire Sprinkler Mandate

Dear members of the Board of Supervisors:

I respectfully urge the Board of Supervisors to re-examine the fire sprinkler mandate for high-rise apartments. The city has not provided data showing significant fire casualties in the 125 targeted buildings over the past 50 years, yet residents are being asked to shoulder extraordinary costs. Alternatives such as automatic aerosol fire extinguishing systems were not considered, despite being less intrusive and more affordable. Even with a 12-year compliance period, the financial burden on 15,000 residents is unsustainable, and property values are projected to drop by at least 10%, forcing many—including owners of 400 units—to sell under duress. This mandate was passed without thorough study, and it must be revisited to ensure both safety and fairness. Thank you for your consideration.

Best Regards

Darwin Shu

1000 North Point Street, unit 1107, San Francisco, CA 94109

(415)837-3783.

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Sent from Yahoo Mail for iPhone

**From:** Ashley Marriott
**To:** Board of Supervisors (BOS)
**Subject:** re: Strong Opposition to Sprinkler Retrofit Mandate for High-Rise Condos
**Date:** Thursday, November 27, 2025 11:52:44 AM

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

Dear Members of the San Francisco Board of Supervisors,

I am writing as a homeowner at **Fontana East** to state in the strongest possible terms my **opposition to the proposed sprinkler retrofit mandate** for existing high-rise condominium buildings. This mandate is not only financially devastating but raises serious questions about fairness, legality, and government overreach.

## 1. The Proposed Mandate Would Impose Financial Hardship of an Unprecedented Scale

Retrofit estimates for buildings like Fontana East run into the **tens of millions of dollars**, translating into **hundreds of thousands of dollars per unit**—costs that would be pushed entirely onto homeowners.
This is not a "minor improvement" or a manageable assessment. It is a **catastrophic financial blow**.

Many of our residents are seniors, long-term owners, and individuals living on fixed or moderate incomes. A mandate of this magnitude would effectively force them out of their homes. This is **displacement via legislation**, and it is unacceptable.

## 2. Legal and Equity Concerns

The City must seriously consider whether it is **legally defensible** to require:

- Individual homeowners to fund a massive infrastructure project they did not cause
- Retroactive compliance on buildings that met all codes at the time of construction
- Mandates so burdensome that they threaten property ownership and housing stability

Such a law could be subject to legal challenge under:

- **Takings Clause concerns** (imposing extreme costs without compensation)
- **Due process concerns** (retroactive burdens without necessity or reasonable justification)
- **Equity and discrimination concerns** (disproportionate impact on seniors and fixed-income residents)

Other cities that attempted similar mandates were forced to revise or abandon them once the

financial and legal implications became clear.

## 3. Massive Construction Intrusion and Health Risks

A building-wide retrofit of this scale requires:

- Opening ceilings and walls in every single unit
- Weeks of construction per residence
- Potential exposure to asbestos or other legacy materials
- Disruption for residents who work from home or have health issues

This is not simply an upgrade. It is a **multi-year, highly invasive construction project** taking place literally inside people's homes.

## 4. Fontana East Already Has Strong Fire-Safety Systems

Fontana East is a fire-resistive building with:

- A monitored fire alarm system
- Concrete construction
- Fire-rated walls and corridors
- Established emergency procedures
- HOA oversight and professional management

The City has **not demonstrated** that sprinkler retrofits would produce a safety benefit significant enough to justify forcing homeowners into financial ruin.

## 5. The Mandate Will Harm, Not Protect, the Community

If enacted, this mandate will:

- Cause **foreclosures and forced sales**
- Depress property values
- Drive out long-time San Franciscans
- Increase HOA delinquencies
- Destabilize an essential segment of the housing market

### 6. Reasonable Alternatives Exist

We urge the City to consider alternatives that provide safety without financial destruction:

- Performance-based evaluations
- Fire-alarm and smoke-control enhancements
- Partial retrofits
- Exemptions or waivers for buildings with strong fire-safety records
- Financial assistance or city-supported grant programs

The proposed sprinkler mandate is financially impossible, legally questionable, and socially harmful. It places an unbearable burden on residents and threatens the stability of communities like Fontana East.

I strongly urge you to **withdraw or substantially revise** this proposal and commit to a fair and economically realistic fire-safety strategy—one that protects lives **without destroying livelihoods**.

Thank you for your immediate attention to this critical issue.

Sincerely,
Ashley Marriott
Homeowner, Fontana East

1000 North Point Street, San Francisco, CA

| | |
|---|---|
| **From:** | Kenneth Piana |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Request to Amend High-Rise Residential Fire Sprinkler Retrofit Mandate – 999 Green Street (“The Summit”) |
| **Date:** | Friday, November 28, 2025 11:48:40 AM |

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

**Kenneth Piana & James Tenero**
999 Green Street, Unit 1602
San Francisco, CA 94133

*28 November 2025*

**San Francisco Board of Supervisors**
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

**Re: Request to Amend High-Rise Residential Fire Sprinkler Retrofit Mandate - 999 Green Street (“The Summit”)**

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## Executive Summary

We are the owners of Unit 1602 at 999 Green Street (“The Summit”), a pre-1975 high-rise condominium on Russian Hill. We strongly support firefighter safety and sensible fire protection measures. However, the current high-rise sprinkler retrofit mandate, as applied to buildings like The Summit, creates serious unintended consequences:

- **Structural reality - post-tensioned slabs:** The Summit uses post-tensioned one-way concrete slabs between a central core and perimeter columns. Like many older buildings in San Francisco adapting to modern codes, 999 Green has seismic modernization work ahead. Hanging a heavy, fully braced sprinkler system from these slabs would require extensive anchors and penetrations that could weaken critical structural elements and increase the risk of damage in a major earthquake.

- **Ceiling-height and habitability conflicts:** To accommodate braced sprinkler lines and soffits, ceilings in units and corridors would be dropped to roughly **7′2″** in many areas. Current code generally requires **7′6″** minimum ceiling height for most habitable rooms and corridors. The retrofit would force us to violate the City’s own standards for what constitutes legal “living space,” immediately reducing both habitability and property value.

- **Severe financial harm to both seniors and younger owners:** Engineering and construction estimates show likely per-unit costs in the range of **$100,000–$300,000**, plus building-level infrastructure. For many buildings, this translates into **$1,000–$3,000 per month per unit for years** in additional assessments. Seniors on fixed incomes cannot sustain this. Nor can “younger” homeowners, who are often cash-poor after buying

into San Francisco and may be forced to sell at a substantial loss and leave the City.

- **Forced temporary displacement with Bay Area-level rents:** A full in-unit sprinkler retrofit in an occupied high-rise would require large portions of the building [and realistically, at points, the entire building] to be vacated for an extended period. Owners would still owe their **mortgage, taxes, HOA dues, and special assessments**, while also paying for a temporary home and utilities. A comparable 3-bedroom condominium rental in San Francisco, particularly in neighborhoods like Russian Hill, can easily cost **$6,000–$8,000 per month**. Over a 6–12 month construction period, that means **$40,000–$90,000+** in additional relocation costs for a single household, on top of the retrofit itself.

- **Existing and new compensating controls:** The Summit already has strong life-safety features: a new in-unit bedroom alarm system installed in the last two years, fire extinguishers and hoses on each floor, and **two separate emergency stairwells serving a maximum of five units per floor**, with each front door only about **20–30 feet** from a stair. These are meaningful protections that can be further strengthened with targeted measures (for example, rules around lithium-battery devices) instead of a blanket in-unit sprinkler mandate.

- **Use risk-appropriate comparisons:** International tragedies like the recent Hong Kong high-rise fire - where buildings were wrapped in bamboo scaffolding, plastic netting, and flammable foam facade materials that allowed flames to race up the exterior - are not an equitable comparison to San Francisco's concrete condominium towers, which do not share those construction conditions. Policy should be driven by the specific risks present in our building stock.

We are not asking you to weaken fire safety. We are asking you to refine this ordinance so it improves overall life safety [fire and seismic] without displacing homeowners and undermining the City's broader goals for housing and revitalization.

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## Full Letter / Analysis

**Dear President and Members of the Board of Supervisors:**

We write as the owners of 999 Green Street, Unit 1602, in The Summit, a high-rise residential condominium on Russian Hill. We care deeply about San Francisco's future, public safety, and the long-term health of this city. We respectfully request that you amend the fire sprinkler retrofit mandate for older high-rise residential buildings so that it is structurally appropriate, consistent with other building codes, and financially sustainable for the people who live in these homes.

## Personal background and support for firefighters

My perspective on this issue is rooted in family as much as policy. I come from a family of firefighters - my father, my uncle, and my aunt all served in the fire service.

I grew up hearing about line-of-duty risks, the devastation of preventable fires, and the lifesaving impact of strong, well-designed fire codes. Because of that background, I have a deep respect for the San Francisco Fire Department and fully support efforts to protect both firefighters and residents.

For that same reason, I am cautious about any measure that **sounds** like it enhances safety but, in practice, may introduce new risks or harms that outweigh its benefits. In this case, we are concerned that the current one-size-fits-all sprinkler mandate, as applied to The Summit and similar buildings, may unintentionally do just that.

## The Summit's construction and interaction with a sprinkler retrofit

The Summit is not a generic concrete tower. Like many older high-rise buildings in San Francisco, it was designed and constructed under earlier building and seismic codes and is now undergoing modern engineering reviews as part of responsible long-term planning by the HOA.

Those professional evaluations describe the primary gravity system in the tower as **post-tensioned one-way concrete slabs spanning north–south between a central core and perimeter columns**. In practical terms, much of the building's strength depends on these relatively thin, highly engineered slabs and their slab-to-column connections.

In a building with this type of post-tensioned slab system:

- Any new work that adds **significant hanging loads** (like an extensive sprinkler piping network with earthquake bracing); and
- Any work that requires **numerous anchors, hangers, screws, and penetrations** into the underside of the slabs

must be handled with exceptional care. If not carefully limited and engineered, such attachments can reduce the effective thickness and capacity of the slab at critical points, interfere with or damage the post-tensioning tendons inside the slab, and concentrate loads where the original design did not anticipate them.

Over time, and especially in a major earthquake, this can increase the risk of cracking, local failures, or more serious structural damage. In plain language: like many buildings in the city adapting to modern codes, 999 Green has seismic modernization ahead of it. Layering a heavy, hung sprinkler system onto those post-tensioned slabs, with hundreds of new penetrations, is not a trivial change—it is a structural intervention that needs careful, building-specific treatment, not a blanket mandate.

From a life-safety standpoint, it is essential that any retrofit requirement for buildings of this type **does not unintentionally encourage** drilling, fastening, and hanging loads in ways that undermine the original post-tensioned system.

## Ceiling height and habitability conflicts with existing code

To meet current seismic bracing requirements for sprinkler systems, the piping in The Summit would need to be installed below the existing concrete slabs and then

concealed in soffits. Our HOA's analysis shows that doing so would reduce ceiling heights in many areas [both in corridors and inside units] to approximately **7 feet 2 inches** under those soffits.

This creates a direct conflict with the codes that define habitability. Under the California Building Code as adopted by San Francisco, **habitable rooms and most occupiable spaces and corridors are required to have minimum ceiling heights of 7 feet 6 inches**. San Francisco's own guidance for residential units follows that standard for living spaces.

If we are required to install a fully braced, in-unit sprinkler system in a way that lowers ceilings to around 7′2″:

- Portions of our units may no longer meet the City's own minimum ceiling-height standards for habitable space;
- The reduction in perceived space and natural light will meaningfully diminish quality of life; and
- Property values will decline not only by the direct cost of the retrofit, but also by the fact that the resulting spaces technically fall below current habitability norms.

In short, the City is effectively asking us to **violate one set of life-safety and housing standards (ceiling height and habitability) in order to comply with another (sprinklers)**. That is not a sustainable or coherent policy position.

## Financial impact on both seniors and younger homeowners

We recognize that much of the public discussion has focused, appropriately, on seniors on fixed incomes who cannot absorb the massive assessments that this ordinance will trigger. Many of our neighbors are in this situation.

At the same time, it is important to recognize another group: **working-age and younger homeowners** who are precisely the people San Francisco needs to keep and attract to fuel its recovery. Many of us are "house-rich, cash-poor," having stretched to make down payments, taken on large mortgages, and paid San Francisco's property taxes and HOA dues.

Based on the coalition's and our HOA's estimates:

- Engineering and permit-ready drawings by 2027 may cost **tens of thousands of dollars** per building.
- Building-wide infrastructure (pumps, larger water connections, standby power, etc.) by 2031 is estimated in the **millions of dollars per building**.
- In-unit sprinklers by 2035 are estimated at **$100,000–$300,000 per unit**, depending on building conditions.

For The Summit, this likely translates into an **additional reserve assessment in the range of $1,000–$3,000 per month per unit for many years**, or correspondingly large special assessments.

### Forced temporary relocation and duplicate housing costs

In practical terms, you cannot run intrusive piping, open ceilings, and install in-unit sprinklers in a high-rise tower while everyone remains fully in place. Large portions of the building—and realistically, at times, the entire building—would need to be vacated for extended periods while construction moves floor by floor and stack by stack. During that time, owners would still be responsible for: their **existing mortgage payments**; **Property taxes**; **HOA dues**; and the **special assessments or increased reserves** needed to fund the sprinkler project itself. On top of that, they would need to pay for a **temporary home in the Bay Area**, plus utilities and moving/storage costs.

Current rental market realities show that:

- A typical 3-bedroom apartment in San Francisco rents in the **$5,500–$6,000 per month** range;
- In neighborhoods like Russian Hill and adjacent areas, 3-bedroom condos and similar units commonly command **$6,000–$8,000 per month or more**.

For a household like ours in a 3-bedroom, that means that a 6–12 month construction period would likely require:

- **$36,000–$96,000+ in additional rent alone,**
- **Plus deposits, utilities, parking, storage, and moving costs,**

all while we continue to carry our mortgage, taxes, HOA dues, and the project assessments.

Very few residents [seniors or younger homeowners] can realistically afford to pay **two sets of Bay Area housing costs** plus special assessments for an extended period. For many, this will be the breaking point that forces a sale and an exit from San Francisco.

## Existing life-safety measures and compensating controls at The Summit

It is also important to recognize the life-safety measures that **already exist** and have been modernized at The Summit:

- **New alarm systems:** Within the last two years, the building installed a new bedroom/in-unit alarm system, greatly improving early detection and audibility while residents are sleeping.
- **Firefighting equipment on each floor:** Every floor has fire extinguishers and hoses available, supporting both early response by residents (where safe) and rapid use by the Fire Department.
- **Short egress distances and multiple exits:** Each residential floor has no more than five units, and there are two separate emergency stairwells serving each floor. From any unit's front door, it is roughly 20–30 feet to a stairwell. These short egress distances and multiple paths significantly improve the ability of residents to evacuate safely.

Taken together, these measures—combined with the inherent compartmentation of a concrete high-rise—already provide a strong baseline of fire safety. There are additional, targeted improvements that could be implemented (for example, further

alarm enhancements or specific work in common areas) without imposing a full in-unit sprinkler retrofit that conflicts with habitability standards, raises structural concerns, and forces mass displacement.

## Use risk-appropriate examples and focus on local building conditions

We understand that global high-rise fires, including recent tragedies abroad, can influence public perception and policy discussions. Those events are sobering reminders of why strong codes and enforcement matter. But many of those disasters occurred in buildings with very different construction and renovation practices—such as towers wrapped in **bamboo scaffolding, plastic netting, and flammable foam facade materials** that allowed flames to race up the exterior. That is simply not the condition of San Francisco's concrete condominium towers, including the buildings affected by this ordinance.

It is essential that San Francisco's policy be driven by the **actual risks present in our building stock**—such as interior ignition sources, lithium-ion devices, and evacuation conditions—rather than by tragedies whose primary drivers were combustible scaffolding and cladding systems that do not exist here.

## Targeting the real fire risks

The limited fire history in affected high-rise buildings here, and recent coverage of high-rise fires in San Francisco, suggest that **lithium-ion batteries and devices like e-scooters and e-bikes** are a significant driver of risk. If that is the primary concern, a more direct and proportionate policy response would focus on:

- Prohibiting or strictly limiting in-unit charging of scooters and e-bikes;
- Requiring dedicated, sprinklered, and monitored common areas for charging high-risk devices; and
- Enhancing education and enforcement around battery safety.

These measures would address the actual ignition sources driving recent incidents, without forcing every unit in every impacted high-rise to undergo invasive, structurally complex, and financially crippling retrofits.

## A better path forward

We believe there is a middle ground that preserves and enhances life safety while respecting structural realities and residents' financial limits. Specifically, we respectfully request that the Board:

1. **Limit mandatory in-unit sprinklers to major renovations or substantial value increases.**
   Tie the requirement to clear triggers [such as large-scale remodeling or substantial increases in building value] rather than imposing a blanket retrofit deadline on all existing units.

2. **Provide a clear equivalency / "alternative means and methods" path.**

Direct the Fire Department and Department of Building Inspection to create a robust, predictable process for structurally complex buildings like The Summit to propose alternative compliance packages (e.g., enhanced alarms, partial sprinklers in specific areas, stricter battery controls) that deliver comparable fire safety without undermining structural systems or habitability.

3. **Prioritize targeted risk-based measures.**
   Focus legislative and enforcement energy on the real, demonstrated risk drivers [especially lithium-battery devices] through restrictions, dedicated charging infrastructure, and education, rather than a broad mandate that treats all fire scenarios as equivalent.

4. **Coordinate with seismic modernization, not against it.**
   Ensure that any fire-protection retrofit requirements are explicitly coordinated with ongoing or planned seismic modernization work for older high-rise buildings, so that one safety initiative does not compromise another.

## Conclusion

As the child/nephew of firefighters, I deeply understand why this Board and the Fire Department want to reduce fire risk in high-rise buildings. We share that goal. But public safety policy has to consider **all** relevant risks - fire, seismic performance, structural integrity, displacement, and the broader health of the city.

For buildings like The Summit, a blanket in-unit sprinkler mandate:

- Conflicts with minimum ceiling-height and habitability standards;
- Interacts in complex ways with post-tensioned structural systems that need careful, building-specific treatment;
- Imposes financial burdens that will displace both seniors and younger homeowners and force them to pay for duplicate housing in one of the most expensive rental markets in the country; and
- Does not directly target the specific fire risks we see in recent incidents, nor is it justified by overseas tragedies rooted in very different facade and scaffolding conditions.

We respectfully ask you to refine this ordinance - to create a path that genuinely improves life safety without undermining structural performance, housing stability, or the City's broader revitalization efforts.

Thank you for your time, consideration, and service to San Francisco. We would welcome the opportunity to discuss these concerns with your offices or staff.

Respectfully submitted,

---

**Kenneth Piana**
Owner, 999 Green Street, Unit 1602
San Francisco, CA 94133
415-627-8599
kenneth.piana@gmail.com

---

**James Tenero**
Owner, 999 Green Street, Unit 1602
San Francisco, CA 94133
415-260-2417
JTenero@selmanlaw.com

**From:** Allison McCrady
**To:** Board of Supervisors (BOS)
**Subject:** FIRE SPRINKLER MANDATE PASSED?????? Voters needed to know!
**Date:** Saturday, November 29, 2025 3:37:41 PM

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

Dear Board Members,

I am a 4th generation San Francsican and avid voter. I respectfully request that you amend the fire sprinkler retrofit requirement for older highrises. There are other safety measures that are completely effective!!! I am shocked that you passed this mandate without a discussion or notification to those that are affected. I certainly did not support this type of decision making when I voted!.

I am unable to relocate in the event of this construction. This measure will be a terrible personal hardship. Please Have compassion!

Very Sincerely Yours,

Allison E McCrady

**From:** Sercan Arik
**To:** Board of Supervisors (BOS)
**Subject:** URGENT: Support for Engineered Life Safety Systems (ELSS) as an Alternative to Fire Sprinkler Mandate
**Date:** Saturday, November 29, 2025 6:55:47 PM

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

Dear Supervisors

I am a long-term resident of San Francisco and an owner at **999 Green Street, Unit 1104**. I am writing to you today regarding the impending deadline to retrofit existing high-rise residential buildings under the proposed 2025 San Francisco Fire Code, specifically Ordinance 225-22.

First and foremost, I fully support the Fire Department's mission to enhance public safety. We all want a safer city. However, the current mandate—which effectively requires a full sprinkler retrofit—is an example of a good-intentioned policy leading to a catastrophic and unnecessary economic outcome for residents in older, concrete high-rises.

**The Unnecessary Burden on Concrete Buildings**

Our building, constructed in 1964, is a poured concrete structure. Retrofitting with full sprinklers is not a simple renovation; it is a complex, destructive, and financially devastating undertaking.

- Current engineering estimates are forcing residents in buildings like mine to face **special assessments ranging from $200,000 to over $300,000 per unit**.
- This cost places an impossible financial burden on seniors and fixed-income residents, resulting in potential **displacement, foreclosures, and an immediate devaluation** of a large segment of San Francisco's housing stock.
- The invasive work (drilling through concrete, potential asbestos abatement) will also render many units uninhabitable for months.

**The Safe and Responsible Alternative: ELSS**

I urge you to support an amendment to the 2025 Fire Code that officially recognizes and permits the use of **Engineered Life Safety Systems (ELSS)** as an equivalent alternative to full sprinkler installation in qualifying pre-1975 concrete buildings.

ELSS is a safe, proven, and code-compliant method that achieves the primary goal of fire safety through a combination of:

- Upgraded fire alarms and communication systems.
- Enhanced smoke controls and compartmentation.
- Targeted sprinkler placement in corridors and common areas.

This approach provides a necessary safety upgrade without the economic and destructive consequences of requiring the demolition of every unit's interior. It is the only sensible path forward for unique concrete structures like 999 Green Street.

I appeal to you to consider the humanitarian and economic impact of this legislation. Please work with the Fire Commission to implement a common-sense solution that protects both lives *and* livelihoods.

Thank you for your service and attention to this urgent matter. I look forward to your leadership on this issue, especially in advance of the community meetings scheduled for next month.

Sincerely,

Sercan Arik

**From:** Tom Longust
**To:** Board of Supervisors (BOS)
**Cc:** manager@thecomstock.net
**Subject:** Fire Sprinkler Retrofit Requirement for certain high rise apartment buildings
**Date:** Sunday, November 30, 2025 1:47:08 PM

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

Dear Supervisors,

Sent from Yahoo Mail for iPhone

I am writing on behalf of my wife and myself to request an exception be made to the fire sprinkler retrofit requirement for apartment buildings that pose a low fire risk.

We are in our eighties and selected the Comstock apartments for our home to avoid the expense and disruption of maintaining a private residence while offering a less regimented lifestyle than a retirement center.

Should the retrofit be required we would have to vacate our home and rent someplace else to live for the duration of the project. We would also have to put much of our furniture and belongings in storage as we would have to rent a small temporary home to limit the cost. At our age the added expense of funding the assessment to pay for the retrofit, as well as the monthly charge to pay for our share of the normal building expenses, and the cost for temporary housing would drastically reduce our savings for our retirement.

We very well might find we no longer could afford to resume living at the Comstock because of the expected higher monthly expense after the retrofit and the major hit on our savings.

Please look for less drastic alternatives to avoid such a major disruption and large expense for elderly retirees like ourselves.

Thank you for your consideration,

Tom & Jackie Longust
Apartment 1210
Comstock Apartments

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|---|---|
| **From:** | Louis Saroni III |
| **To:** | Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; SauterStaff; MandelmanStaff (BOS); Board of Supervisors (BOS) |
| **Subject:** | San Francisco high rise sprinkler mandate. |
| **Date:** | Sunday, November 30, 2025 8:18:02 PM |

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

I am writing to express my concerns regarding the proposed San Francisco high rise sprinkler mandate. As a third-generation San Francisco native, I have lived at 1835 Franklin St, Unit 502, for 60 years, and this community is deeply important to me. The financial burden of potentially two to three hundred thousand dollars to install a sprinkler system, especially when it may be technically infeasible due to the age and design of my building is truly daunting. My understanding of the ordinance is that it requires retrofitting systems, which may not be possible for many older buildings like mine.

I am concerned that recent decisions may not fully consider the perspective and hardship of longtime homeowners. San Francisco is already an expensive city, and additional mandates such as this one could force residents out of their homes, seeming to work against ongoing efforts toward affordable housing. While I greatly appreciate the city's commitment to public safety, I hope that homeowner concerns and the feasibility of such requirements will be carefully reviewed.

We all want a safe and thriving San Francisco, and I am open to discussing alternatives that balance safety and affordability for everyone. If the city has plans to assist homeowners with the financial costs or to address the logistical challenges and displacement that could result from these upgrades, I would welcome more information. Otherwise, strongly feel that this mandate should be reconsidered for the good of the community.

Thank you for taking the time to consider my perspective. I look forward to your response and to a thoughtful discussion about the future of our city.

Sincerely,

Louis Saroni III
415 203-8306

Get Outlook for iOS

| | |
|---|---|
| **From:** | Reese Bacon |
| **To:** | Board of Supervisors (BOS) |
| **Cc:** | Daniel Rubin |
| **Subject:** | Sprinkler Mandate |
| **Date:** | Monday, December 1, 2025 7:22:40 AM |
| **Attachments:** | image001.png |

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

*"I am once again writing to request you to take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our buildings on other feasible life safety measures that will protect our residents and visitors.*

*The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on our residents."*

*If the code is not changed, I will need to relocate while the work is being completed at great expense and inconvenience. I'm a senior citizen on a fixed income. I'm sure you are well aware of the housing crisis in the city. Please tell me to where I could even relocate while the work is being completed.*

*I acknowledge like everyone else who wants fire safety and its importance. Our building has complied with all the recent fire safety mandates like the sounders project (we spent $500,000) and the upcoming ERCCS project at $250,000. Our homeowners association is willing to work with the fire department on evaluating future fire safety proposals to see how we might make our buildings safer within reasonable cost and physical constraints. We discussed some of the fire departments hot issues relative to EV charging, "micro-mobility" devices (scooters, bikes, etc.).*

*On top of the personal economic and physical impact of implementing this mandate, there is also a negative effect on the value of your apartment because of this pending obligation. The entire real estate community in San Francisco is aware of this exposure and we have already heard stories of apartment sales falling through when the potential costs and effects of this issue are disclosed to buyers.*

*I implore you to take action to avoid this disastrous situation.*

*Thank you and sincerely*

**Reese Bacon**
**Managing Director, Sales Effectiveness Practice**
**Gallagher**




595 Market Street, Suite 2100
San Francisco, CA 94105

Book Time with Reese Bacon

M 415-279-3197
E Reese_Bacon@ajg.com
https://www.linkedin.com/in/reese-bacon-4668b4/
https://www.ajg.com/us/

**From:** Sercan Arik
**To:** Board of Supervisors (BOS)
**Subject:** Urgent: Sprinkler Mandate will displace residents at The Summit
**Date:** Monday, December 1, 2025 8:01:00 AM

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

Dear Supervisors,

I am writing to urge you to amend the retroactive fire sprinkler mandate for high-rise buildings.

I have been a resident of San Francisco for a decade. Despite working in the South Bay, I actively choose to live here and contribute to our local economy. However, deeply flawed mandates like this make it increasingly difficult to justify that commitment.

I live at The Summit. If this mandate stands, it creates three critical failures for the city:

**1. It creates a City-Wide Housing Shock** This mandate impacts **126 buildings** simultaneously. Because installation often requires hazardous materials remediation, thousands of residents across the city will be forced into the rental market at the exact same time. This artificial demand shock will drive up rents for *all* San Francisco tenants, not just those in high-rises.

**2. It forces a Violation of Building Codes** To comply with this mandate, we must install soffits that lower our ceilings to **7 feet or lower**. This creates a legal absurdity where the Fire Code forces us to violate the Building Code, creating spaces that are no longer legally defined as "living space." We are effectively destroying the legal status of our homes to comply.

**3. It creates Financial Ruin for a Statistical Outlier** We are facing a **$200,000+ levy per unit** to prevent a risk that has caused only one fatality in these buildings in 60 years—a tragedy caused specifically by an **electric scooter (that can easily be eliminated by other ways)**. The financial shock is equivalent to an annual salary.

**The Solution: Active Prevention (Section 1103.5.4.4)** We should not rebuild 126 towers to solve a "Scooter Problem." We should address the root causes. Please amend the ordinance to allow buildings to Opt-In to an **"Active Fire Safety Community"** standard:

- **Targeted Regulation:**Strictly regulate high-risk items like e-mobility batteries (the actual cause of modern fires).
- **Smart Upgrades:** Mandate fire-rated doors and pressurized stairwells rather than destructive sprinkler retrofits.
- **Accountability:** Use Section 1103.5.4.4 to require recurring safety certifications.

Please do not sacrifice our housing stability for a blanket mandate that ignores the physical and economic reality of our buildings.

Sincerely,

Sercan O. Arik

Unit 1104

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|---|---|
| **From:** | Ruthann Conway |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | URGENT NEED !!!!! to amend sprinkler retro fit bill in High-Rise Residential Building |
| **Date:** | Monday, December 1, 2025 9:30:30 AM |

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

Dear Members of the Board of Supervisors,

I write to you in desperation about a matter that would harm myself and many of my fellow San Francisco resident/ homeowners.

This amendment could cause such serious financial harm to people that have long lived in this community and would be forced to leave or lose a huge amount of their life savings that is held in their largest asset, their home.

This would be devastating for so many that have made major contributions to the city and will need to utilize their asset in their old age for care.

Please help so many of us not lose our life  savings and our home. Being displaced in old age is one of the cruelest things for people who have called the city home for generations.

Please amend San Francisco's fire-sprinkler retrofit requirement for older high-rise buildings so that it would apply ONLY when there is a "Major Renovation," along the lines of the recently enacted all-electric requirement. It is urgent that these amendments be adopted to avoid EXTREME financial and personal hardship for many residents in my building, 1070 Green Street, as well as residents in other buildings throughout San Francisco.

Affordability of housing is already a major issue in San Francisco, and this retrofit requirement will dramatically worsen the situation. In my building, the estimated cost of compliance may exceed an average of $300,000 per unit. This would almost certainly force many residents to sell their homes—while simultaneously reducing the market value of those very units.  Those residents who are not forced to sell their homes would face the additional costs and disruption of temporary housing while ceilings are opened and sprinkler systems installed. Residents would either have to leave San Francisco during that time or attempt to find housing in an already inadequate and overpriced rental market—a situation that will only worsen if some 10,000 homeowners must seek temporary housing simultaneously.

Our building is committed to fire safety. We are already complying with City mandates that will cost us roughly three-quarters of a million dollars for annunciators and emergency-communications (EERC) equipment for use by the Fire Department in case of fire. Our building has voluntarily adopted several additional safety measures to reduce fire risk, including prohibiting e-bikes and

scooters in the building (except in the open areas of the garage) and requiring fire extinguishers for every kitchen. All members of our Board have committed to emergency response team (NERT) training by the Fire Department, and half have already completed the program. I know that our Board would be happy to work with the Fire Department to identify any additional safety measures that could be implemented through the Fire Code or voluntarily.

No other city in California has adopted a retrofit requirement comparable to what is being imposed on San Francisco residents. The few cities that considered anything like it rejected it as far too expensive for the limited safety benefit. It is far too expensive for San Francisco as well. Please adopt the revisions to the retrofit requirement now being recommended.

Thank you for your urgent attention
Please keep us in mind when you make changes
We are for progress but we can't all lose our homes and savings

Respectfully,

Ruthann Ballou Conway
San Francisco resident since 1959
1070 Green Street

415-309-7358

**From:** Richard Royse
**To:** Board of Supervisors (BOS)
**Subject:** Egregious City Mandate for Installation of Sprinkler Systems
**Date:** Monday, December 1, 2025 10:31:00 AM

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

Dear Supervisors:

We are owner/residents of Unit 6A at 2200 Pacific Avenue, a solid concrete and steel building constructed in 1962. We have owned our property since 2013.

We are deeply concerned about the city's mandate requiring the installation of a sprinkler system in our building for the following reasons:

1. Our HOA board estimates the cost for each homeowner at $1,300 - $3,300 per month for nine years, or very large special assessments, amounting to more than $200K per unit, over those nine years.

2. Substantial coring of our structural slabs and structural walls is a real concern for the integrity of our building.

3. Many new sprinkler water pipes all over our building will add to the risk of water damage, which is the number one concern for high rise insurers.

4. The justification for a sprinkler system simply does not exist. There has been one life lost in the last 60 years in the 125 buildings affected by this extreme mandate, due to fire,

and that fire was caused by an electric scooter.

In addition to these concerns, given that we might have to move out of the building for six months, because of asbestos abatement during construction, we would be incurring huge additional expenses finding a rental in a tight housing market.

All of this is needless regulatory overreach, and we urgently request you put a stop to this totally unnecessary sprinkler mandate.

Respectfully,

Richard Royse
Rocky Blumhagen

2200 Pacific Avenue #6A
SF, CA 94115
Tel; 541-992-0522

**From:** Rex Cheng
**To:** Board of Supervisors (BOS)
**Subject:** Fire Sprinkler Mandate
**Date:** Monday, December 1, 2025 10:32:55 AM

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

Hello

In the owner of a San Francisco condo which will  be affected by the fire Sprinkler Mandate.

I am disabled and on limited budget. This mandate would cause unbearable hardship for me.

I sincerely ask for your position on this matter.

Thank You.

Rex Cheng 562-712-2974
2200 Pacific Ave
San Francisco, CA 94115

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|---|---|
| **From:** | Allison Jacobs |
| **To:** | Commission, Fire (FIR); Law, Chad (FIR); Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; Board of Supervisors (BOS) |
| **Subject:** | Please modify the Fire Sprinkler Mandate for older high rises |
| **Date:** | Monday, December 1, 2025 10:47:15 AM |

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

Hi,

I ask that you urgently amend the Fire Sprinkler Mandate for older highrise buildings by either eliminating or drastically limiting it to circumstances when this onerous requirement kicks in, such as only during major, building-wide renovations.

Why urgently?

- Because HOA's and others will need to start imposing drastically increased Reserves Dues to start saving for the sprinklers, beginning for my building in January of 2026, and property values will soon plummet as a result of an unmodified fire sprinkler mandate.
- And also because residents at 2200 Pacific Avenue where I serve as the HOA President, are alarmed and distraught by the implications of the sprinkler mandate. Seniors are literally terrified of the implications for them both from a financial perspective and from the need to move out or sell which is not just inconvenient but inconceivable to them at their age.

The cost of this mandate is extreme, $100-300K per unit. Homeowners in my building are already reeling from the cost of construction and maintenance escalations that have impacted their dues. In addition, this past summer we had to impose a very large special assessment to cover the cost of re-roofing and installing the SFFD mandated louder and lower toned fire alarm annunciators. To cover this assessment, some fixed income homeowners have had to take out reverse mortgages, others are contemplating selling, since they had stretched to buy their unit in the first place and can't manage the new special assessment, despite having a decent wage. ("Decent wages" can't cover an EXTRA 1,300-$3,300 per month, every month for nine years straight, which is what this mandate means to us!) One homeowner may have to be foreclosed upon. All this for maintaining our building by re-roofing, and being forced to replace our 4 YEAR **NEW** FIRE ALARM. (Only 4 years ago we were forced by SFFD to replace our fire alarm when we refurbished our elevator. Now this annunciator mandate is forcing another complete replacement!)

These SF mandates have become ridiculous. They have real world impacts on people and their ability to stay in their homes.

Please be reasonable and help to come up with a more measured and targeted solution to the actual fire risk in the 125 buildings impacted by this legislation. In the last 60 years of experience with all of these 125 buildings, only one fire (caused by an electric scooter) has led to injuries. Forcing fire sprinklers on all of us is not a reasonable, measured response.

Why would San Francisco decide to be the only city in the country to mandate such a sprinkler retrofit? I thought the city was trying to move toward a more reasonable, rather than extreme, regulatory stance.

While I'm one of those lucky ones who can afford this impact, and property value hit, I am still extremely unhappy about it, but even more importantly I feel responsible for the 64 other residents (renters and owners) in our building who will suffer hardship from this.

Please help by moderating this fire code requirement and ease the burden that so many SF mandates are placing on our fellow residents.

Thank you,

Allison Jacobs
President of the 2200 Pacific HOA

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|---|---|
| **From:** | Alexa Karp |
| **To:** | Commission, Fire (FIR); Law, Chad (FIR); Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; Board of Supervisors (BOS) |
| **Subject:** | Amend the Fire Sprinkler Retrofitting Requirement - A letter from 2200 Pacific Ave Resident |
| **Date:** | Monday, December 1, 2025 11:02:33 AM |

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

Hi,

I am writing to request that you take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our buildings on other feasible life safety measures that will protect our residents and visitors.

The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on me.

If the code is not changed, this will greatly impact our living situation, forcing us to move out of the building we have loved for so long. We would not be able to pay for the estimated cost and subsequent increase in Rent/HOA fees.

In addition to the financial hardship we would face, our ceiling heights would drop as much as 14" wherever the sprinkler pipes run, including all over our units, leaving us with 7' or lower ceilings, which is not even considered "living space" by code.

I urge you to amend the fire sprinkler requirement.

Best,
Alexa Karp

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|---|---|
| **From:** | Sid Merchant |
| **To:** | Board of Supervisors (BOS); Lurie, Daniel (MYR); SherrillStaff; Commission, Fire (FIR); Law, Chad (FIR); FireAdministration, FIR (FIR) |
| **Subject:** | SF Fire Dept.....Sprinkler Mandate |
| **Date:** | Monday, December 1, 2025 11:18:15 AM |

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

The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on our residents.

If the code is not changed, I estimate that I will have to pay $250,000 to $300,000 and I would have to move out of the building for 6 to 9 months. Furthermore, no one has demonstrated the need for these upgrades.....to my knowledge there has never been a fire in a high rise building in SF since I moved here in 1985. Moving forward with this mandate will result in long-term chaos in the city. Many residents will suffer from the displacement, and many homeowners will find this to be unaffordable.

Thank you for your consideration.....and please amend the fire sprinkler retrofitting requirement for older high-rise buildings.

Sid Merchant
HOA Treasurer
2200 Pacific Ave #11C
San Francisco, CA 94115
415-567-0984

| | |
|---|---|
| **From:** | rodman@marymor.com |
| **To:** | Commission, Fire (FIR); Law, Chad (FIR); Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; Board of Supervisors (BOS) |
| **Cc:** | Allison Jacobs |
| **Subject:** | Urgent Request to Consider a Sensible Compromise - Fire Sprinkler Mandate |
| **Date:** | Monday, December 1, 2025 11:45:03 AM |

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

Dear San Francisco Government Leaders:

I am owner of a unit at 2200 Pacific Avenue, an older (1967) high rise building. I am writing regarding the pending Mandate for Fire Sprinkler retrofitting in our building and so many others around our city.

With an understanding of the financial impact that such a retrofit would create on my San Francisco neighbors and me, I would strongly ask that you modify the requirement, and find an alternative, more realistic solution to address fire safety in our buildings.

Left as is, and as I understand it, the required retrofitting would increase my (and all of our) monthly fees by almost 100% for a period of at least nine years. The cost *per unit* is estimated at around $200,000. *This is unaffordable*. Right now, 2200 Pacific Avenue is in the midst of a one-year fire sprinkler retrofit for all of the hallways and stairwells…this in itself is a $60,000 assessment just for my unit.

If you decide to enforce the full scope of the per-unit retrofit, it would require us to vacate for up to six months - we'd also have to deal with asbestos mitigation in our older building… adding even more to the cost. So, where would we vacate to, when there are around 125 apartment buildings, co-ops and condos that would be impacted. I expect that *we would sell our unit and leave the city*, taking our financial impact with us.

I am sure you are coming to realize that *this mandate will create a full portion of unforeseen consequences*. At a time when the city is working so hard to "come back," the implementation of this measure would create the opposite outcome: many residents would simply move out of the city, and finding new buyers and renters with sharply increased expense due to the assessments would be a real challenge. *Is this what San Francisco needs?*

I urge you to *reconsider the mandate*, and modify it in a manner that would be more realistic for the thousands of residents who would be affected. As residents, owners, and renters in the greatest city in the world, let's find *a solution that works for everyone* in regard to affordability, safety, and community harmony.

Respectfully,

Rodman Marymor
Owner
2200 Pacific Avenue, E
San Francisco, CA. 94115

415 748 6039

| | |
|---|---|
| **From:** | Ben Gurdus |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Urgent: Please reconsider the Fire Sprinkler mandate |
| **Date:** | Monday, December 1, 2025 12:15:33 PM |

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

Dear Members of the Board of Supervisors,

I am writing urgently to ask that you amend the fire sprinkler retrofitting requirement for older high-rise buildings. This mandate places an unbearable financial and personal burden on residents like me while offering little real safety benefit.

My spouse and I are senior citizens living at 2200 Pacific Avenue, and this is our lifelong home. We cannot afford the enormous cost— hundreds of thousands of dollars per unit—nor could we endure being forced out for months during construction. We are at a loss of how to find and afford any temporary housing. For us, this could very well mean losing our homes entirely.

The reality is that this mandate would devastate San Francisco homeowners and renters alike—driving people out, lowering property values, and worsening the city's housing crisis—while doing almost nothing to improve safety. In sixty years, there has been only one fire-related death in any of the affected buildings, and that was caused by an electric scooter. A far more effective and reasonable step would be to require safe, fireproof storage areas for e-bikes and similar devices.

Please, do not let this unnecessary and destructive policy harm thousands of San Franciscans. We need a practical, balanced approach that protects safety without destroying our homes and our financial security.

Sincerely,

**Benjamin Gurdus**
Resident, 2200 Pacific Avenue, San Francisco

**From:** Joanne Hurley
**To:** Board of Supervisors (BOS)
**Subject:** Fire sprinkler ordinance for older condo buildings
**Date:** Monday, December 1, 2025 12:16:39 PM

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

To the Board of Supervisors:

Let me start by stating that I am not opposed to fire safety, however I am writing to request you to take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings.

The fire sprinkler mandate places an unreasonable physical and financial hardship on me and my neighbors. Per The San Francisco Standard on November 20 (**San Francisco wanted to protect condo owners from fires. It might displace them instead**), the Budget and Legislative Analyst estimated $113,000 to $300,000 *per unit in 2016* - over nine years ago. Our building has many elderly residents and people living on limited incomes. Don't let our ZIP code fool anyone into thinking we are a wealthy community here. On top of the cost, what will the disruption entail? Will we and our elderly neighbors have to move out during all this? With the current lack of affordable housing, where will everyone go and how much will we have to pay in rent (on top of our mortgage)? Additionally, the condo market is relatively soft right now. If we wish to sell and must disclose the potential for hundreds of thousands of dollars in work required watch that market get softer.

As noted in the San Francisco Chronicle on November 17 (**Sprinkler shock: Owners of S.F. high-rise condos stunned by $300K mandate**) of the apartment fires in 2022, the vast majority were not in buildings that would be impacted by the sprinkler ordinance. I recognize that no one wants to be perceived as against safety, but you can't retrofit every building on the backs of owners living in expensive San Francisco. We already went through the requirement of installing improved smoke detectors and fire alarms in our building. My 815 sq. ft. condo has three extremely loud horns within 12 feet of one another. Two of them are back-to-back on a thin wall. Overkill?

Rather than impose this expensive and disruptive mandate (which was passed without any notice to or discussion with the affected buildings), I prefer you work with my building's Board of Directors and Property Manager on other feasible life safety measures that will protect our residents and visitors. We welcome a dialog on ideas for implementing financially reasonable, practical, and effective measures that would improve fire safety in my building.

One final note of irritation. I have to wonder how cozy Dan Torres of Battalion One is with

government officials. They are set to make a pretty penny off this ordinance. As quoted by the Chronicle he said, “What is a life worth?” It rings hollow coming from the designer and installer of sprinklers.

Thank you for your time and consideration.

Warm regards,
Joanne Hurley
1001 Pine Street
San Francisco

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|---|---|
| **From:** | jay finkelman |
| **To:** | Lurie, Daniel (MYR); Commission, Fire (FIR); Law, Chad (FIR); FireAdministration, FIR (FIR); SherrillStaff; Board of Supervisors (BOS) |
| **Subject:** | Fire Sprinkler Mandate Objections |
| **Date:** | Monday, December 1, 2025 3:09:46 PM |

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

Dear Mayor, Fire Chief, Fire Commissioners & Board of Supervisors,

I join all our owners and tenants at 2200 Pacific and urge you to pass legislation to remove the fire sprinkler mandate in our high-rise residential buildings and respect the unconscionable financial and logistical hardships it would impose on all residents in this building.

No one disputes that fire sprinklers are a good thing that can protect lives and property - and should be installed in all new buildings. But imposing such onerous requirements retroactively is misguided and frankly outrageous.

Our building includes many older owners and residents on fixed incomes and with various medical issues -- who absolutely can't afford these extraordinary costs or being forced to move even for a limited period.

Where should we move? To your offices? Who will pay for extended hotel stays we can't afford? Who will pay HOA dues in the interim?

Were proper studies even performed to establish the cost/benefits of such an extraordinary requirement? Did owners have an opportunity to participate and provide input?

Of course I want my building to be safe. We have been willing and able to comply with all the previous mandates the Fire Department has required in the interests of safety -- but the current mandate is unreasonable and beyond our resources.

We understand it may seem politically "safer" to do nothing and allow this destructive measure to remain unchallenged -- but we will remember who undermined our financial integrity and destroyed our quality of life -- and we will demonstrate and vote accordingly.

Thanks for considering our welfare and concerns.

Sincerely,

Jay Finkelman, PhD

| | |
|---|---|
| **From:** | Tom Fowler |
| **To:** | Commission, Fire (FIR); Board of Supervisors (BOS); Danny Sauter; SauterStaff |
| **Cc:** | Manager Comstock; Neil Bardack |
| **Subject:** | Mandated Sprinkler Ordinance |
| **Date:** | Monday, December 1, 2025 3:23:59 PM |

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

I am writing to urgently request that you take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and to work with our building on feasible alternative life-safety measures that will protect residents and visitors without causing undue harm.

The overwhelming majority of units in our building are occupied by residents over the age of 65 who live on fixed incomes. For many, this mandate would be nothing short of catastrophic. We have already been hit with a 7.5% increase in our homeowners dues for 2026, and the additional costs associated with this requirement would push many residents beyond what they can reasonably afford.

This mandate will likely force me to consider leaving San Francisco altogether for more affordable options.

The fire sprinkler ordinance was passed without any meaningful notice or discussion with the buildings most affected. It imposes an unreasonable physical and financial burden on residents who are already stretched thin. For individuals like me, the combination of living on a fixed income, facing significant special assessments, confronting long-term increases to our monthly Comstock dues, and potentially incurring moving expenses is simply unsustainable.

I respectfully ask that you reconsider this mandate and collaborate with our community to implement safety measures that are both effective and financially realistic.

Thank you,

Thomas Fowler

1333 Jones Street - The Comstock

**From:** greg oldham
**To:** Board of Supervisors (BOS)
**Subject:** Fire Sprinkler Mandate
**Date:** Monday, December 1, 2025 4:18:15 PM

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

Dear Supervisors,

We are writing to request that you take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our buildings on other feasible life safety measures that will protect residents and visitors.

The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on us.

The drop in our ceiling heights that would be required by the mandate would leave us with seven-foot ceilings, which are not an acceptable living space. Also, since our building has both lead and asbestos, we would be forced to move out of our apartment, store all of our furniture and find new housing. All of this would be extremely expensive and challenging.

It is not clear to us how the City can impose a requirement of this magnitude (that disrupts our lives financially, physically and emotionally) without a close consultation with the people who are affected by it.

We strongly urge you to amend this mandate and consider other safety measures.

Thank you.

Sincerely,
Greg Oldham and Bai Park
2200 Pacific Ave., Apt 11F

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|---|---|
| **From:** | Mike Loscavio |
| **To:** | Commission, Fire (FIR); Law, Chad (FIR); Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; Board of Supervisors (BOS) |
| **Subject:** | San Francisco Fire Sprinkler Mandate |
| **Date:** | Monday, December 1, 2025 5:18:06 PM |

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

Please continue to investigate alternatives and options to the SF Fire Sprinkler System Mandate. I am an elderly resident of 2200 Pacific Ave, San Francisco and ask for your help.

Gratefully yours,

John Michael Loscavio

**From:** carmen teves
**To:** Board of Supervisors (BOS)
**Subject:** Sprinkler Mandate
**Date:** Monday, December 1, 2025 7:48:26 PM

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

December 1, 2025

Dear Board of Supervisors,

I write to express objection to the San Francisco fire code 2022 change mandating automatic sprinklers in every residential high-rise unit built before 1975. This ill-informed requirement puts an inordinate burden on residents of the designated buildings. It will result in displacements and distress sales for many living in them.

Forced implementation of the new code will victimize not only vulnerable residents but also San Francisco. The radical commitments of time and resources, not to mention the unknown additional costs, are already depressing property values. This will worsen as the true burden becomes clear. The City can expect a flood of property tax abatement requests as these units decline in value.

The well-intentioned safety goals could surely be achieved through other means. I have seen no statistics regarding the benefits of this requirement over other less draconian approaches (except perhaps to the sprinkler-head contractors) nor any examination of water damage risks through faulty sprinklers. I urge
those engaged in this discourse to consider alternatives such as fire doors or controls on storage of high-risk electrical items.

The San Francisco Standard published a thoughtful article addressing this matter. I include a link to the report here as a reference and in support of this urgent request for action.

https://sfstandard.com/2025/11/20/san-francisco-condo-sprinkler-mandate/

Sincerely,

Carmen Lhuillier
1896 Pacific Avenue, Apt 302.
San Francisco, CA. 94109

| | |
|---|---|
| **From:** | Nadia Carey |
| **To:** | Lurie, Daniel (MYR); Board of Supervisors (BOS); FireAdministration, FIR (FIR); SherrillStaff; SauterStaff; MandelmanStaff (BOS); Fire.Commission |
| **Subject:** | Urging you to take action on the sprinklers' mandate in older high-rise buildings |
| **Date:** | Monday, December 1, 2025 8:57:41 PM |

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

Dear Mayor Lurie, members of the Board of Supervisors, members of the Fire Administration, and members of the Fire Commission,

I am writing to urge you to take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our buildings on other feasible life safety measures that will protect our residents and visitors.

The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings. It places an unreasonable physical and financial hardship on our residents. In fact, it was deemed financially impossible for the city to handle, and everyone jumped at the idea to pass the cost to residents, mind you, mainly retirees.

The full extent of the mandate is unknown but would certainly exceed $250,000 per unit, and the construction will force residents out of the building for an unknown but prolonged period of time. This price has already increased almost 10 fold since the first assessment was made in 2016. I am sure it will sky-rocket when all the high-rises will have to do this work simultaneously. A lot of us will not be able to return to our units, and being unable to sell them with this imminent or ongoing project, would go bankrupt. How will that add to a safe well being of the seniors residing in the older high-rises?

On a personal note, I am a retiree; the unit in the Fontana West is my only home.

If the code is not changed, I will have to put all my belongings in storage and move out of my unit for a prolonged period of time. I cannot leave the city as I am taking care of my elderly mother who currently resides in one of the San Francisco senior homes. I will have to rent a place in the city. With today's rental situation, it is next to impossible and unaffordable for a retiree.

The cost of such a retrofit is estimated to be so high, that I will have to spend a better part of my retirement savings to finance my part of it. I will not be able to sell my unit, since the prices will inevitably fall after the disclosure of the imminence of such a project.

I am facing a disastrous future if the fire sprinklers requirement is not amended. The more I think about it, the more desperate I feel.

Taking a closer look at the Fire code, it appears that in 1103.5.4.4 it is explicitly stated that parts of the Code can be waived if they "pose an undue hardship with little increase in life safety".

The proposed plan is adding a layer of protection to recently installed sound alarms in every room, stairwell, and all common places, as was required by the Fire department. Original building was constructed with solid reinforced concrete walls and ceilings. Have you inspected our building prior to creating such a mandate? It is one of the safest buildings firewise, especially compared to single family homes in the city.

The unfunded sprinkler mandate will add little to the safety of senior residents, but will definitely bankrupt the majority of us.

The logic which allowed to mandate a group of senior citizens on fixed income to install major infrastructure, which is not affordable even for the City, at their own expense, with no discussions with the affected buildings, is faulty. I respectfully ask you to reconsider and amend the Fire Code taking into consideration financial, logistical and health and mental hardships for all residents of all affected buildings.

Best regards,

Nadia Carey
1050 North Point St. #507

| | |
|---|---|
| **From:** | Bryan Girard |
| **To:** | Commission, Fire (FIR) |
| **Cc:** | Board of Supervisors (BOS) |
| **Subject:** | Concerning the Sprinkler mandate in older high-rises... |
| **Date:** | Monday, December 1, 2025 9:33:21 PM |

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

To whom it may concern— I am a San Francisco native and a shareholder (in other words, an apartment owner) in the Fontana Building at 1050 North Point St. I am appalled by the recent mandate requiring fire sprinkler retrofitting in older high-rise buildings. I'm sure I don't need to school you on the specifics of this mandate but I would like to emphasize the practical effect if it is not amended:

The cost is astronomical and will ultimately be borne by the us, the residents, many of whom are seniors and would be unable to afford the commensurate increase in our monthly HOA fees. That, on top of the necessity to re-locate while the work is being done, would force some of us out of our homes and possibly onto the streets. As you well know, The City has a severe housing shortage and at 79 years of age, I, personally, would not know how to survive. This is an unfair, draconian measure that needs to be modified. The Fontana and others have requested an amendment that would require such retrofitting only when the building undergoes a major renovation. This strikes me as a very reasonable, common-sense approach.

When I first read the mandate I thought, I would have to sell my apartment, however, I now realize that nobody would buy it with a liability such as this. This is a financial nightmare.

Nobody I know is against fire safety precautions but it is not an exaggeration to say that the negative impact of this mandate could be as adversely consequential as losing one's home to a fire.

Please, please do not force us to incur this enormous expense and disruption to our lives.

Thank you for your consideration,

Bryan Girard

| | |
|---|---|
| **From:** | Iris Cheng |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Sprinkler mandate |
| **Date:** | Tuesday, December 2, 2025 2:24:10 AM |

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

We simply cannot afford the fees associated with a new sprinkler mandate. We purchased in 1993 and are retiring in SF. This will preclude us living in the city for our golden years.

Please avert this mandate.

Thank you,

Iris Cheng
2200 Pacific Ave
SF

| | |
|---|---|
| **From:** | Reese Bacon |
| **To:** | Board of Supervisors (BOS); Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; SauterStaff; MandelmanStaff (BOS); Commission, Fire (FIR) |
| **Cc:** | Daniel Rubin |
| **Subject:** | Sprinkler Mandate |
| **Date:** | Tuesday, December 2, 2025 7:55:18 AM |
| **Attachments:** | image001.png<br>image002.png |

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*Good morning, Ladies and Gentlemen*

Sprinkler Mandate.loop

*"I am once again writing to request you to take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our buildings on other feasible life safety measures that will protect our residents and visitors.*

*The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on our residents."*

*If the code is not changed, I will need to relocate while the work is being completed at great expense and inconvenience. I'm a senior citizen on a fixed income. I'm sure you are well aware of the housing crisis in the city. Please tell me to where I could even relocate while the work is being completed.*

*I acknowledge like everyone else who wants fire safety and its importance. Our building has complied with all the recent fire safety mandates like the sounders project (we spent $500,000) and the upcoming ERCCS project at $250,000. Our homeowners association is willing to work with the fire department on evaluating future fire safety proposals to see how we might make our buildings safer within reasonable cost and physical constraints. We discussed some of the fire departments hot issues relative to EV charging, "micro-mobility" devices (scooters, bikes, etc.).*

*On top of the personal economic and physical impact of implementing this mandate, there is also a negative effect on the value of your apartment because of this pending obligation. The entire real estate community in San Francisco is aware of this exposure and we have already heard stories of apartment sales falling through when the potential costs and effects of this issue are disclosed to buyers.*

*I implore you to take action to avoid this disastrous situation.*

*Thank you and sincerely*

**Reese Bacon**
**Managing Director, Sales Effectiveness Practice**
**Gallagher**

Insurance | Risk Management | Consulting

595 Market Street, Suite 2100
San Francisco, CA 94105

Book Time with Reese Bacon

M 415-279-3197
E Reese_Bacon@ajg.com
https://www.linkedin.com/in/reese-bacon-4668b4/
https://www.ajg.com/us/

**From:** dorian
**To:** Board of Supervisors (BOS)
**Subject:** Fwd: Fire Sprinkler mandate for SF
**Date:** Tuesday, December 2, 2025 9:33:40 AM

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

To: The Board of Supervisors

*I am writing to request you to take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our buildings on other feasible life safety measures that will protect our residents and visitors.*

*The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on our residents.*

*The idea that I will need to vacate my home, deal with the expense of moving out, rent short term during the fix that will cost $200,000.00 to $300,000.00 for a sprinkler is catastrophic. My one-bedroom unit had an estimated value of $1.5 million. HOWEVER now with the announcement of the sprinkler mandate the condo market in our building is LOCKED UP with the only sale potential at a significant discount.*

*The primary mandate for San Francisco leadership is to make housing affordable! This blows up the pricing on condos adding hundreds of thousands in costs, displacing seniors that can't accommodate this payment*

*and destroys equity that is needed to face retirement.*

*PLEASE think about the effect of your decision making on your constituents.*

J. Dorian McKelvy

1080 Chestnut St. 5B
San Francisco, Ca. 94109

**From:** wroussin@susanroachlaw.com
**To:** Board of Supervisors (BOS)
**Cc:** Bill Roussin - Roach Law; "Susan Roach"
**Subject:** 2200 PACIFIC #7F, SAN FRANCISCO, CA 94115
**Date:** Tuesday, December 2, 2025 10:02:38 AM

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

Dear Board of Supervisors:

My wife and I are owners at 2200 Pacific, #7F, San Francisco, California 94115. We were recently advised of the City's intent to retrofit the sprinkler system in our building (2200 Pacific as above referenced). I am writing to strongly request that you take action to amend the fire sprinkler requirement for older high rise buildings and work with our buildings on other feasible life safety measures that will protect our residents and visitors.

The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on us.

If the code is not changed it will place an exorbitant cost on me and other owners of anywhere from an additional $1,300.00 to $3,000.00 per month for nine (9) years or a special assessment of $200,000.00 over a nine (9) year period. The value of my condo and other condos will drop in market value by the cost of this mandate and will be hard to sell with this mandate in place for the next nine (9) years or during the nine (9) years. We will be forced to move out for six (6) months having to incur the cost of storage for our furniture together with substitute lodging while the work is being done and there will be hazardous waste remediation all over the building. Housing is already scarce in San Francisco for obtaining substitute housing for people residing in the building full time. We intend to retire there. Our ceiling heights would drop as much as 14" where sprinkler pipes run leaving us with 7 foot clearance or lower. Again, this affects everyday living together with re-sale value. Substantial coring of our structural slabs and structural walls will be a concern for the integrity of the building. There will be enhanced risk of water damage throughout the building.

The justification for this extreme mandate does not exist. I am advised that in the last 60 years there has been only one death attributable to fire in another high rise and this was unrelated to any sprinkler system and was caused by an electric scooter.

I cannot impress upon you the importance of reversing this mandate. Thousands of people will be impacted in a negative manner for no reasonable reason whatsoever. Please take action on this matter. Please feel free to contact me if I may be of any further assistance. Please keep me advised of all progress on this matter and what the game plan is for the future.

Sincerely yours,

THE ROACH LAW FIRM
W. EDWIN ROUSSIN
ATTORNEY AT LAW
11628 Old Ballas Road, Ste. 116
Creve Coeur, MO 63141
Phone No.: (314) 434-7272
Facsimile No.: (314) 434-6500
https://url.avanan.click/v2/r01/___www.susanroachlaw.com___.YXAzOnNmZHQyOmE6bzpmNTg5NDVhNjc3MDk0ZDE2NDFjMzJjN2Q5N2RhYjdjZjo3OjE3YTQ6MzI1Yzc0ZDg0MzRmZmE2YWFjN2EyZDIzODMxYThjMDYwY2Q1NjkyODQ4YzI3YmJiODRjNTJhMjZlMmY4NWNhYzp0OlQ6Tg

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Thank you, THE ROACH LAW FIRM

**From:** Linda Frandsen
**To:** Board of Supervisors (BOS)
**Subject:** Sprinkler Mandate
**Date:** Tuesday, December 2, 2025 10:42:30 AM

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

I'm an owner at 2200 Pacific Avenue in SF. My husband and I saved our entire lives for the opportunity to own a home in the city we love. Most of the owners in our condo building are not millionaires, but rather regular hard-working people, and most are in their later years.

I have the following questions for you:

1. Before this Mandate went into effect, was there a study performed to identify the exact number of lives that will be saved by this Mandate vs. the lives that will be severely disrupted and livelihoods that will be destroyed? As many of the owners in our building are elderly, did you weigh the financial and mental stress you'd be putting on owners? Stress causes death too.

2. We live in a steel and concrete building. Why are these buildings part of this Mandate?

3. We have 8 foot ceilings and even though the SF code is a minimum of 7'6", are we really supposed to drop these ceilings? Would you want to live in a home with ceilings this low?

4. If we need to move out for this project to be done, where do we go? Who's going to pay for this?

5. How will this Mandate impact property values? You're putting us in an impossible position to either sell and take much less than the property should be worth, or to give up an unbelievable amount of money that would otherwise go to living our lives.

6. I fear water damage much more than fire. What happens if one of these sprinklers, that will be in EVERY room of our condo, accidentally goes off. What happens if we're not at home during this event and numerous

units in our building are ruined?

Please think this through before you put an unbelievably unpopular and untenable mandate on the good people of this city. Thank you.

Linda Frandsen
2200 Pacific Avenue, 7E
San Francisco, CA 94115

Sent from my iPad

**From:** John Spensieri
**To:** Board of Supervisors (BOS)
**Subject:** Sprinkler Ordinance meeting 12/11
**Date:** Tuesday, December 2, 2025 11:39:51 AM

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

Dear Board of Supervisors,

Unfortunately, my wife and I cannot attend the December 11th meeting and again want to express our concerns about this unnecessary ordinance that the proposed solution to a problem that does not exist is a terrible financial burden on the owners of this property.

We are writing as individual owners at Cathedral Apartments located at 1201 California Street, unit 702 to express our deep concern about the sprinkler retrofit requirement and devastating financial burden it would place on my wife and I and our neighbors.

The estimated cost for our share alone would exceed $300,000 per apartment., not including a severe increase in monthly dues and months of disruption and temporary relocation. Like many residents, I am not a developer or investor- this is our home and life savings. Such an expense is simply unmanageable and would force us to consider selling or taking on untenable debt.

Beyond the personal impact, this mandate would cause widespread financial distress across the city's housing stock, reduce property values, and ultimately shrink the property tax base.

We strongly urge you to support the proposed relief language limiting the retrofit requirement to "major renovations". It is a reasonable compromise that maintains safety while preventing financial disaster for thousands of San Franciscans.

Thank you for your time and for considering the very real human consequences of this issue.
Sincerely,

John and Jayne Spensieri
Owners of Cathedral Apartments unit 702
1201 California Street
San Francisco Ca 94109

415-515-5521

| | |
|---|---|
| **From:** | Patterson, Jeff |
| **To:** | Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; SauterStaff; MandelmanStaff (BOS); Board of Supervisors (BOS); Law, Chad (FIR) |
| **Subject:** | Reconsideration of Unreasonable Fire Sprinkler Mandate for Older High-Rise Buildings |
| **Date:** | Tuesday, December 2, 2025 1:00:50 PM |

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

I am writing to request that Mayor Lurie, the San Francisco Board of Supervisors, and the San Francisco Fire Administration take action to amend the currently contemplated fire sprinkler retrofitting requirement for older high-rise buildings. I urge you to work with our buildings on other feasible life safety measures that will protect our residents and visitors. The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship and loss on owners and residents. If the mandate is not reconsidered and amended, it will have catastrophic economic consequences for me and similarly situated unit owners and tenants of affected buildings. Among other things:

1. I will be subject to a special assessment of $200,000 - $300,000. This is not only a hugely disproportionate and unbearable expense, but it casts an untenable cloud on my unit, destroying its market value.
2. I will be required to move out of my unit for 6 to 12 months or more for the required major construction work, thereby imposing further unreasonable expense; and
3. Major modifications will be made to my unit, resulting in lowered 7-foot ceilings, which will make my unit uninhabitable and unmarketable.

I and all other owners and occupants in these buildings cannot withstand these devastating impacts. While fire safety is clearly important, the current fire sprinkler mandate poses unreasonable financial and physical burdens at a time when the City of San Francisco should be focused on increasing the housing supply and reducing the cost of occupancy. This sprinkler mandate for older buildings is absolutely contrary to the goal of encouraging increased supply and affordability of housing.

I urge you to support the reconsideration of these onerous sprinkler retrofitting requirements and to work with the representatives of over 125 affected buildings to arrive at a more reasonable approach that is consistent with the City's housing goals.

Respectfully,

Jeffrey R. Patterson
2200 Pacific Ave., #7B
San Francisco, CA 94115

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**From:** Julian Chen
**To:** Board of Supervisors (BOS)
**Subject:** Objection to Fire Sprinkler Retrofit Mandate
**Date:** Tuesday, December 2, 2025 1:09:54 PM

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

Dear Board of Supervisors,

I am reaching out once again to emphasize the importance of this issue to myself, my family, and thousands of local San Francisco residents.

As a concerned resident, I am writing this email to voice my urgent objection to the fire sprinkler retrofitting requirement for older high-rise buildings. I currently reside in one of the potentially impacted buildings with my wife and 5-year old daughter -- we've lived here for the last seven years. If allowed to proceed, this mandate would cause an enormous financial burden that we as a family cannot possibly bear. The estimated cost for each unit is between $200,000 - $300,000, or an additional monthly cost of $3,000/month for nine consecutive years. This is well beyond our means, particularly as I have been recently laid off from work (to be frank, it would be well beyond our means even if I maintained employment). Further, our family would be forced to move out for at least 6 months due to potential construction, leading to struggles to find alternate housing, uprooting our daughter, and more.

I urge you to please consider the ramifications of such an extreme mandate on thousands of local residents and families. I request that this mandate be amended, and that you work together with our buildings to enact more feasible safety measures.

Thank you,
Julian Chen

**From:** Kurt Schwabe
**To:** Board of Supervisors (BOS)
**Subject:** San Francisco Sprinkler Mandate
**Date:** Tuesday, December 2, 2025 2:25:11 PM

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

Dear Honorable Supervisors,

I'm a homeowner at 2200 Pacific Avenue in San Francisco. My wife and I spent twenty years saving so we could eventually afford a home in the city we love. Many neighbors in our building are long-time residents of modest means—most of them in their later years—so decisions like this have a profound impact on real people, not wealthy investors. As you all know "Affordability" is on everyone's minds these days - especially when trying to live in San Francisco - and something like this gives the word a whole new meaning.

I'd appreciate your help understanding several issues raised by this Mandate:

1. Financial and emotional strain on residents
   Has there been any assessment of the toll this requirement will place on older homeowners—many of whom live on fixed incomes? The stress, uncertainty, and potential displacement could carry serious health consequences of their own.
2. Temporary relocation and responsibility for costs: If the construction work requires people to vacate their units, what provisions exist for alternative housing? Should owners be expected to shoulder those expenses entirely?
3. Water-damage risk from added sprinklers
   In our building, the possibility of an accidental sprinkler discharge is a far more immediate concern than fire. With sprinklers placed in every room, what safeguards are in place to prevent widespread water damage if a system malfunctions while residents are away?
4. Effect on property values and future livability: What analysis has been done on how this Mandate will affect home values? Many of us fear

being forced to sell for far less than our units are worth—or drain retirement savings to comply.

5. Applicability to steel-and-concrete structures: Our building is constructed of steel and concrete, which already provides significant fire resistance. Additionally we have two concrete and steel exit stairwells at either end of our building. Why are buildings of this type included in the same category as more vulnerable structures?
6. Public infrastructure to pipe water to hilltop buildings. Who's going to pay for that? At least one building has already had to halt work on this project when it was determined they would have to pay for a 4' trench from the top of Russian Hill to North Beach.

These are serious concerns for the residents who have built their lives and communities here. I ask that you fully consider the human, financial, and practical implications before advancing a Mandate that so many find unworkable and deeply distressing.

Thank you for your service to our great city and helping us find a common sense solution that does not bankrupt us or force people out of their homes.

Sincerely,
Kurt Schwabe
2200 Pacific Ave.
San Francisco CA
94115

Sent from Yahoo Mail for iPhone

**From:** David Finkelstein
**To:** Board of Supervisors (BOS)
**Subject:** Please amend the proposed fire sprinkler retrofit requirement.
**Date:** Tuesday, December 2, 2025 3:38:27 PM

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

Dear Mayor and Supervisors,
I have owned a unit in 2200 Sacramento Street for 35 years and love living in the building. We already have fire alarms, drills and upgrades but the proposed fire sprinkler retrofit requirement would be an unconscionable burden on all of us who live here, but especially seniors like me. If we are assessed hundreds of thousands of dollars and forced to relocate for a year or more during the construction, it would cause us great physical and emotional harm, not to mention the financial implications. We'd probably be forced to sell our unit and might become homeless or at least displaced. Please reconsider this ill-advised requirement which seems out of step with the rest of our neighboring cities and was apparently approved without input from the community or impartial experts. We had no prior knowledge or discussions and are obviously horrified that this might actually cause us to loose our home. Our building has done all the other necessary upgrades and has external fire escapes and fire-proof doors, concrete walls and very loud alarm systems already. Why punish us for being compliant?
Sincerely,
David Finkelstein
david.finkelsteinmd@comcast.net

**From:** Lois Lin
**To:** Board of Supervisors (BOS)
**Subject:** STRONG Objection to Fire Sprinkler Retrofit Mandate
**Date:** Tuesday, December 2, 2025 4:17:42 PM

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

Dear Board of Supervisors,

I am sending another email to emphasize my objection to this Fire Sprinkler Retrofit Mandate. The financial and psychological burden it places on my family and thousands of other San Francisco residents is appalling.

I am writing this email to voice my urgent objection to the fire sprinkler retrofitting requirement for older high-rise buildings. My husband and I, along with our 5-year old daughter have lived here happily for the last seven years. Our neighborhood is a wonderful, family-friendly place with great schools and local businesses we love to support.

The estimated cost for each unit based on the proposed mandate is between $200,000 - $300,000, or an additional monthly cost of $3,000/month for nine consecutive years. I work in healthcare at Sutter CPMC Van Ness, while my husband is currently laid off and searching for a job. Neither of us work in an industry that even remotely allows us to bear this additional monthly burden.

Additionally, as our family would be forced to move out for at least 6 months due to potential construction, we would be in dire straits given the struggles to find and pay for alternate housing. This may result in us being forced to relocate out of SF, which would be devastating to us and the community we've created here, as we've always planned to plant roots in SF for generations to come.

I urge you to please consider the ramifications of such an extreme mandate on thousands of local residents and families. As our elected supervisor, I trust that you work for the well-being of local families who love and want to continue to make SF a wonderful place to live. Please amend this mandate. We look forward to working together with our buildings to enact more feasible, and even more effective safety measures.

Thank you,
Lois Chen

| | |
|---|---|
| **From:** | Niloufar Mirjalili |
| **To:** | Commission, Fire (FIR); Law, Chad (FIR); Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; Board of Supervisors (BOS) |
| **Subject:** | Request to Amend Fire Sprinkler Retrofit Mandate for older High-Rise Buildings |
| **Date:** | Tuesday, December 2, 2025 5:24:40 PM |

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

Sent from my iPhone
Sent from my iPad

Begin forwarded message:

**From:** Niloufar Mirjalili <nilmir38@gmail.com>
**Subject: Request to Amend Fire Sprinkler Retrofit Mandate for Older High-Rise Buildings**

Dear all,

I am writing to request that you take action to **amend the fire sprinkler retrofitting requirement for older high-rise buildings** and work with affected buildings on **other feasible life safety measures** that will protect residents and visitors without imposing unreasonable burdens.

The current sprinkler mandate was passed without notice or discussion with those impacted and places a **severe physical and financial hardship** on homeowners like me.

If the code is not changed, I will face **monthly costs of thousands of dollars for nearly a decade**, and my unit's value will **drop significantly**, making it difficult to sell. The retrofit process would also force residents to **move out for months** due to hazardous material remediation, at a time when San Francisco's housing market is already under tremendous strain.

Please help ensure that life safety improvements are pursued in a **balanced, collaborative, and practical way** that protects both residents and the long-term livability of our buildings.

Thank you for your attention to this urgent issue.

Sincerely,
**Niloufar Mirjalili**
**2200 Pacific Ave, unit 3B**

| | |
|---|---|
| **From:** | Drew Stotts |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | REPEAL FIRE SPRINKLER RETROFIT REQUIREMENT |
| **Date:** | Tuesday, December 2, 2025 6:53:54 PM |

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

Hello Board of Supervisors,

I am writing to request you to take action to amend the fire sprinkler retrofitting requirement for older high-rise building. City's 2016 Budget and Legislative Analyst report advised against the retrofit requirement. The requirement was crafted without input from your constituency. As written currently the sprinkler retrofit requirement places unreasonable physical and financial hardship on me and your other affected constituents.
I request you work with your constituency on other, feasible life safety measures.
My home at 1835 Franklin, as all San Francisco high-rises regardless of age, is constructed in accordance to Type 1 Construction of the Building Code. In other words, it is not made of fire vulnerable wood. It is constructed of non-combustible material and exit paths (hallways) are fire protected from fires in apartments.
Exit stairwells are even further fire protected.
My fellow building residents and I have already funded the Retrofit Fire Horn installation to conform with San
Francisco Ordinance 1103.7.6.1. This expense is in addition to monthly expenses that pays for San Francisco
required high-rise life safety measures such as fire drills, testing of existing fire alarm system and certifying fire
extinguishers.
While retrofitting fire horns is disruptive, disruption caused by installing sprinklers is enormous. My building,
as most older high-rise buildings, has asbestos. Sprinklers cannot be installed without disturbing asbestos. It is
not safe to live in an environment where asbestos is disturbed, thus I - and most of your other constituents
affected by this sprinkler retrofit requirement - will have to find and pay for a temporary home.
New pressurized water source and fire pump will have to be installed.

That is a tremendous expense. In 1835 Franklin's zero lot line situation, we would be challenged to find a location for a fire pump without eliminating parking. We are already down to only one parking spot per each Homeowner. To eliminate a couple of parking stalls will be a legal nightmare for our HOA and an additional expense.
I am a Startup Founder living within financial constraints. If my building is required to be sprinkler retrofitted, I will not be able to continue to stay in my current home at 1835 Franklin.
I request that you:
1. educate yourself on the wide-ranging negative impacts of this sprinkler retrofit requirement.
2. educate yourself on current life safety provisions already in place
3. be aware that high-rises recently have, or are currently funding life safety enhancement of fire horn

additions in our homes
4. be an advocate for your constituents, not entities that might financially benefit from this requirement.
Sincerely,
Drew Stotts

1835 Franklin St. #103

| | |
|---|---|
| **From:** | dorian faust |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Fw: Request regarding SFFC 1103.5.4 |
| **Date:** | Wednesday, December 3, 2025 10:01:55 AM |

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

Dear Board of Supervisors,

I am writing regarding SFFC 1103.5.4.

Please know that if this is fully enforced as stipulated, it would be an absolute financial and personal hardship on me, and likely for all of my co-tenant owners in our building, 1894 Pacific Ave., San Francisco, which is subject to the ordinance. Many of us would no doubt have to sell our units, which would be horrible, and clearly not the intent of the ordinance but a certain (and probably unanticipated) byproduct of it.

A "one size fits all" approach as dictated by the ordinance makes no sense. Surely there are buildings subject to the ordinance, like ours, that have innumerable fire safety measures. Safety is important and I believe it is best for the City and SFFD to work with us on alternate methods to achieve it - for owners and for the fire fighters. Methods that cause less financial, property, and life distress!

For example, for our building, Station 1 Fire Safety inspects components of our system monthly, quarterly, and annually, on a set schedule. Our safety systems include sprinklers in the common area, the exits of the units, fire escapes, fire hoses on each level, a wet and dry standpipe system, and fire extinguishers in every unit as well as the common areas.

I am imploring you to consider the consequences of the board of supervisors not doing anything, and I am asking that you consider options including:

- Providing a 5-year extension - So you guys can focus on fine tuning this mandate.
- Structural hardship of retrofitting vintage buildings, to its residents of altering a building for compliance as written.
- Financial hardship for owners, especially low income residents.
- Have SFFD be able to work with buildings individually on the alternate ways of accomplishing improved safety vs. having a one size fits all code.
- Exemptions for buildings that have well maintained existing fire safety systems
- Allow for alternate, feasible life saving measures tailored to individual buildings

Thank you for your consideration- I am a long term, tax paying involved resident of San Francisco, and would like to remain one, and have the confidence in you and some of your colleagues to do the right thing on this very important situation.

Regards,

Dorian Faust

**From:** Ellen Shapiro
**To:** Board of Supervisors (BOS)
**Subject:** Proposed fire sprinkler mandate
**Date:** Wednesday, December 3, 2025 10:16:30 AM

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

Dear San Francisco Supervisors:

I have written to you before about this topic, but think it so important that I'm contacting you again to urge you to abandon the idea of requiring fire sprinklers in pre-1975 high-rise apartment buildings.

The proposed mandate's significant downsides include:

1. Excessive unanticipated cost - as much as $300,000 - to be incurred by each individual apartment owner;

2. The necessity of vacating each unit during installation of the sprinklers;

3. The necessity of finding/renting temporary housing in an already expensive and limited rental market; and

4. The psychological and physical stress associated with all of these.

Many of us who would be affected by the proposed mandate are elderly and live on fixed incomes. The demands that the proposal would impose would be devastating to many of us who would be unable to bear all of the financial and emotional burdens of the disruption.

Everyone wants a safe city. No one wants firefighters to be exposed to greater danger than they face in an already dangerous job.

Can't the City find a way, other than the proposed sprinklers, by which to protect our firefighters and at the same time avoid enormous harm to our affected citizens? There must be some solution that will serve both groups, and I respectfully urge you to find one.

Very truly yours,

Ellen Shapiro (age 78)
2200 Pacific Avenue

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|---|---|
| **From:** | Bradley White |
| **To:** | Commission, Fire (FIR); Law, Chad (FIR); Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; Board of Supervisors (BOS) |
| **Subject:** | Amendment To Fire Sprinkler Retrofitting Requirements For 2200 Pacific Avenue, San Francisco |
| **Date:** | Wednesday, December 3, 2025 10:34:27 AM |

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

I am writing to request that you to take action to amend the fire sprinkler retrofitting requirement for older high-rise buildings and work with our buildings on other feasible life safety measures that will protect our residents and visitors.

The fire sprinkler mandate was passed without any notice to or discussion with the affected buildings and places an unreasonable physical and financial hardship on me. Our HOA has informed me that just for my one-bedroom condo, I will be facing an assessment of $200,000. Moreover, my condo will be uninhabitable for 6 months because my building contains lead and asbestos in it, requiring hazardous waste remediation all over the building. I will not be able to rent the unit because the tenants would have to move out. Further, my ceiling height would drop by as much as 14 inches to make room for the sprinklers, resulting in a ceiling height of seven feet, which is lower than allowed by code for habitable living space. In effect, these unnecessary fire sprinkler retrofitting requirements will reduce the value of my unit to zero. As such, unless these requirements are not amended, I will sue the city for inverse condemnation pursuant to the Fifth Amendment and Article I, Section 19 of the California Constitution.

Sincerely yours,

Bradley R. White
bwhite1231@me.com
(510) 219-5831
Sincerely yours,

Bradley R. White
bwhite1231@me.com
(510) 219-5831

**From:** ann@marymor.com
**To:** Board of Supervisors (BOS)
**Subject:** First Sprinkler Mandate - Please Revisit and Amend
**Date:** Wednesday, December 3, 2025 12:56:50 PM

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

Dear San Francisco Board of Supervisors

As an owner of a unit at 2200 Pacific Avenue, an older (1967) high rise building.

With an understanding of the financial impact that such a retrofit would create on my San Francisco neighbors and me, I would strongly ask that your requirement, and find an alternative, more realistic solution to address fire safety in our buildings.

Left as is, and as I understand it, the required retrofitting would increase my (and all of our) monthly fees by almost 100% for a period of at least nine years. The cost per unit is estimated at around $200,000. *This is unaffordable*. Right now, 2200 Pacific Avenue is in the midst of a one-year fire sprinkler retrofit for all of the hallways and stairwells…this in itself is a $60,000 assessment just for my unit.

If you decide to enforce the full scope of the per-unit retrofit, it would require us to vacate for up to six months - we'd also have to deal with asbestos mitigation in our older building…adding even more to the cost. So, where would we vacate to, when there are around 125 apartment buildings, co-ops and condos that would be impacted. I expect that *we would sell our unit and leave the city*, taking our financial impact with us.

I am sure you are coming to realize that *this mandate will create a full portion of unforeseen consequences*. At a time when the city is working so hard to "come back," the implementation of this measure would create the opposite outcome: many residents would simply move out of the city, and finding new buyers and renters with sharply increased expense due to the assessments would be a real challenge. *Is this what San Francisco needs?*

With this and other issues at hand, there is an urgency for you to *reconsider the mandate*, and modify it in a manner that would be more realistic for the thousands of residents who would be affected. As residents, owners, and renters in the greatest city in the world, let's find *a solution that works for everyone* in regard to affordability, safety, and community harmony.

Respectfully,

Ann Marymor
2200 Pacific Ave #10E

**From:** Karen Tucker
**To:** Commission, Fire (FIR)
**Cc:** Law, Chad (FIR); Lurie, Daniel (MYR); FireAdministration, FIR (FIR); SherrillStaff; Board of Supervisors (BOS)
**Subject:** Fire Sprinkler Mandate Urgent Request
**Date:** Wednesday, December 3, 2025 3:52:01 PM

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

Dear Fire Commission,

I am an owner/full time resident of the 2200 Pacific Avenue Condominium building, Unit 9C, which is one of 126 buildings impacted by the San Francisco Fire Sprinkler Code mandate.

As a retired 74 year old, I have invested my life savings into my home and plan to stay here in throughout my retirement years. **The impact of the increased financial burden and relocation during the retrofit period to comply with this mandate would be impossible for me. I simply cannot afford this current Fire Sprinkler Mandate hardship and expense. It was approved and passed without any notice or discussion with the residents in the affected buildings and without regard for the unreasonable and devastating physical and financial hardship on me and others.**

Specifically, for our building at 2200 Pacific Avenue, I urge you to consider our request to:

1. amend the fire sprinkler mandate for smaller high-rise buildings like mine, and work with us on other feasible life safety measures that will continue to protect our residents, **and allow us to stay in our homes during the retrofit,** such as:

a. adding hallway fire sprinklers, and adding sprinklers inside the units ONLY in the entryway
b. replace existing unit entry doors with fire rated doors
c. Review our building's two existing interior stairwell exits (as required, one on each end of the hallways) and replace existing doors if needed with new fire-rated ones.

2. **The justification for this current extreme mandate doesn't exist for our all-concrete-and-steel reinforced building. The concrete ceiling height clearance in our apartments is only 8 ft. with no false ceiling space to conceal the new fire sprinkler and soffit, and once installed, could lower the ceiling to 7 ft. or even less in crucial areas. That height is not up to living-spaces code.**

3. The structural impact on retrofitting our building could compromise the safety of the building, in addition to adding substantial increase risk of water leaks.

Fire prevention and safety is very important to all residents, and our building is currently in the process of completing the mandated Fire Alarm upgrades.

Thank you for your time and consideration of this issue.

Respectfully,

Karen L. Tucker

2200 Pacific Ave #9C
San Francisco, CA 94115
ktucker@mcn.org

**From:** Meriel Lindley
**To:** Board of Supervisors (BOS)
**Subject:** Fwd: Respectful Opposition to Proposed Fire-Sprinkler Retrofit Mandate
**Date:** Thursday, December 4, 2025 8:42:44 AM

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

**Subject: Respectful Opposition to Proposed Fire-Sprinkler Retrofit Mandate**

—

**Dear Members of the San Francisco Board of Supervisors,**

**San Francisco's reputation has always rested on its resilience, creativity, and ability to balance safety with livability. After several difficult years, the City is finally showing real signs of economic renewal—downtown activity is improving, investment is cautiously returning, and residents are beginning to regain confidence. A sweeping, mandatory sprinkler-retrofit requirement for older residential buildings at this fragile stage could unintentionally reverse that progress and send an unsettling message to homeowners and investors alike: that even stable, code-compliant properties may face large, unfunded mandates at any time.**

**Economic and Housing-Market Concerns:**

**The retrofit costs projected for mid-sized condominium buildings—often $200,000 per unit or more—are simply unmanageable for many ordinary San Franciscans. These buildings are not normally owned by the very wealthy; they shelter retirees, middle-income families, and long-term residents who have invested carefully to remain in San Francisco. Owners already shoulder increasing special assessments, especially in older buildings. Sudden, uncompensated costs triggered by the mandate would cause real hardship, pushing some owners to sell below value and others into debt they cannot sustain. Meanwhile, prospective buyers would be discouraged.**

**The City already faces one of the tightest and most expensive housing markets in the nation. Large-scale retrofits would disrupt and dislocate both owners and tenants, removing units from service during construction and adding pressure to an already strained rental market. Landlords facing steep retrofit expenses would have little choice but to seek rent increases or sell their properties, deepening the affordability crisis.**

**Questionable Cost–Benefit Balance:**

**Fire safety is essential, yet data show that fatalities have largely occurred in specific high-risk structures (SRO hotels and mixed-use buildings) not in owner-occupied condominiums with modern alarms, smoke detectors, and safe egress. Mandating sprinklers across every older residential building would deliver minimal incremental safety benefit at an enormous collective cost. Targeted enforcement, improved alarm systems, and focused retrofits in truly high-risk structures would achieve far greater safety at far lower economic and social cost.**

**Protecting San Francisco's Reputation and Recovery:**

**At a time when San Francisco is striving to attract residents, visitors, and business investment, new mandates that appear financially punitive risk undermining confidence in San Francisco's governance and housing stability. The City's credibility depends on balanced, data-driven policy that recognizes both safety and economic sustainability.**

**For all the foregoing reasons, I respectfully urge the San Francisco Board of Supervisors to reconsider a blanket sprinkler mandate.**

**Respectfully,**
**Meriel Lindley (69 years old)**

**2200 Pacific Avenue**
**Unit 11E**
**San Francisco, CA 94115**

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | Calvillo, Angela (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS); De Asis, Edward (BOS); BOS-Operations |
| **Subject:** | 5 Letters Regarding Lobbying |
| **Date:** | Thursday, December 4, 2025 12:26:20 PM |
| **Attachments:** | 5 Letters Regarding Lobbying.pdf |

**Hello,**

Please see the attached 5 letters regarding lobbying activity in San Francisco government.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

**From:** Laurence Huang
**To:** Board of Supervisors (BOS); MelgarStaff (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA
**Date:** Saturday, November 29, 2025 8:03:24 PM

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# Message to the Board of Supervisors, Mayor, and the City Attorney

From your constituent: Laurence Huang

Email: TedEBear1986@gmail.com

Subject: No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA

Message:

Dear Mayor Lurie, SFMTA Board Members and Board of Supervisors,

Mayor, you are doing a great job but this is something that could be improved.

It is ironic that the City funds non-profit organizations who then use those funds to lobby the city.

For example, the San Francisco Bike Coalition and Walk SF both actively plan projects with SFMTA and then lobby SFMTA and San Francisco government on behalf of those same projects. And both receive substantial funding from the city.

As a taxpayer I am opposed to funding special interest organizations that lobby against my interests. It is unethical and irresponsible to approve contracts to activist groups who lobby public officials and agencies.

Walk SF received $311,274 from FY 2022-2024 and San Francisco Bike Coalition has received $2,788,151 from FY 2022-2025 from SFMTA. And there is $425,736 still owed to the San Francisco Bike Coalition under its current contract with SFMTA.

The distrust of the Board of Supervisors is high;

there were clear conflicts of interest with the previous mayor.

Similarly, trust in SFMTA has diminished due to prior leadership's lack of transparency and fiscal irresponsibility. They funded activist groups such as San Francisco Bike Coalition and Walk SF who bully seniors, people with disabilities, and many other groups who are just trying to get by.

The quality of life of the majority of hard working, taxpaying San Franciscans has decreased over the last several years due to the work of the SFMTA and the BoS.

I urge you to terminate SFMTA’s contracts with San Francisco Bike Coalition and Walk SF effective immediately.

Sincerely,

Laurence

**From:** Carl Wendorf
**To:** Board of Supervisors (BOS); MelgarStaff (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA
**Date:** Tuesday, December 2, 2025 7:08:25 PM

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# Message to the Board of Supervisors, Mayor, and the City Attorney

From your constituent: Carl Wendorf

Email: carlwendorf@yahoo.com

Subject: No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA

Message:

Dear Mayor Lurie, SFMTA Board Members and Board of Supervisors,

It is ironic that the City funds non-profit organizations who then use those funds to lobby the city.

For example, the San Francisco Bike Coalition and Walk SF both actively plan projects with SFMTA and then lobby SFMTA and San Francisco government on behalf of those same projects. And both receive substantial funding from the city.

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The quality of life of the majority of hard working, taxpaying San Franciscans has decreased over the last several years due to the work of the SFMTA and the BoS.

I urge you to terminate SFMTA’s contracts with San Francisco Bike Coalition and Walk SF effective immediately.

Sincerely,
Carl E. Wendorf

**From:** Ari Kim
**To:** Board of Supervisors (BOS); MelgarStaff (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA
**Date:** Wednesday, December 3, 2025 12:56:17 PM

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# Message to the Board of Supervisors, Mayor, and the City Attorney

From your constituent: Ari Kim

Email: ari4kim@gmail.com

Subject: No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA

Message:

Dear Mayor Lurie, SFMTA Board Members and Board of Supervisors,

It is ironic that the City funds non-profit organizations who then use those funds to lobby the city.

For example, the San Francisco Bike Coalition and Walk SF both actively plan projects with SFMTA and then lobby SFMTA and San Francisco government on behalf of those same projects. And both receive substantial funding from the city.

As a taxpayer I am opposed to funding special interest organizations that lobby against my interests. It is unethical and irresponsible to approve contracts to activist groups who lobby public officials and agencies.

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The distrust of the Board of Supervisors is high; there were clear conflicts of interest with the previous mayor.

Similarly, trust in SFMTA has diminished due to prior leadership's lack of transparency and fiscal irresponsibility. They funded activist groups such as San Francisco Bike Coalition and Walk SF who bully seniors, people with disabilities, and many other groups who are just trying to get by.

The quality of life of the majority of hard working, taxpaying San Franciscans has decreased over the last several years due to the work of the SFMTA and the BoS.

I urge you to terminate SFMTA’s contracts with San Francisco Bike Coalition and Walk SF effective immediately.

Sincerely,

**From:** Won Kim
**To:** Board of Supervisors (BOS); MelgarStaff (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA
**Date:** Wednesday, December 3, 2025 3:54:38 PM

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# Message to the Board of Supervisors, Mayor, and the City Attorney

From your constituent: Won Kim

Email: wkim3035@gmail.com

Subject: No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA

Message:

Dear Mayor Lurie, SFMTA Board Members and Board of Supervisors,

It is ironic that the City funds non-profit organizations who then use those funds to lobby the city.

For example, the San Francisco Bike Coalition and Walk SF both actively plan projects with SFMTA and then lobby SFMTA and San Francisco government on behalf of those same projects. And both receive substantial funding from the city.

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The quality of life of the majority of hard working, taxpaying San Franciscans has decreased over the last several years due to the work of the SFMTA and the BoS.

I urge you to terminate SFMTA’s contracts with San Francisco Bike Coalition and Walk SF effective immediately.

Sincerely,

**From:** Alice Kim
**To:** Board of Supervisors (BOS); MelgarStaff (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA
**Date:** Thursday, December 4, 2025 8:25:44 AM

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# Message to the Board of Supervisors, Mayor, and the City Attorney

From your constituent: Alice Kim

Email: allie4073@hotmail.com

Subject: No Taxpayer Funding of Groups that Coordinate with and then Lobby SF Government/ SFMTA

Message:

Dear Mayor Lurie, SFMTA Board Members and Board of Supervisors,

It is ironic that the City funds non-profit organizations who then use those funds to lobby the city.

For example, the San Francisco Bike Coalition and Walk SF both actively plan projects with SFMTA and then lobby SFMTA and San Francisco government on behalf of those same projects. And both receive substantial funding from the city.

As a taxpayer I am opposed to funding special interest organizations that lobby against my interests. It is unethical and irresponsible to approve contracts to activist groups who lobby public officials and agencies.

Walk SF received $311,274 from FY 2022-2024 and San Francisco Bike Coalition has received $2,788,151 from FY 2022-2025 from SFMTA. And there is $425,736 still owed to the San Francisco Bike Coalition under its current contract with SFMTA.

The distrust of the Board of Supervisors is high; there were clear conflicts of interest with the previous mayor.

Similarly, trust in SFMTA has diminished due to prior leadership's lack of transparency and fiscal irresponsibility. They funded activist groups such as San Francisco Bike Coalition and Walk SF who bully seniors, people with disabilities, and many other groups who are just trying to get by.

The quality of life of the majority of hard working, taxpaying San Franciscans has decreased over the last several years due to the work of the SFMTA and the BoS.

I urge you to terminate SFMTA’s contracts with San Francisco Bike Coalition and Walk SF effective immediately.

Sincerely,

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 7 Letters Regarding Cigarettes |
| **Date:** | Thursday, December 4, 2025 12:27:05 PM |
| **Attachments:** | 7 Letters Regarding Cigarettes.pdf |

Hello,

Please see attached 7 letters regarding the banning of plastic cigarette filters.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** isabelle speers
**To:** Board of Supervisors (BOS)
**Subject:** It's Time for San Francisco to Ban Plastic Cigarette Filters
**Date:** Monday, December 1, 2025 10:22:11 AM

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

SF Board of Supervisors ,

I'm writing to urge you to introduce or support legislation to ban plastic cigarette filters in San Francisco. These filters—commonly known as cigarette butts—are the single most littered item on our planet and one of the most toxic forms of plastic pollution affecting our city's streets, parks, and waterways.

Each year, cigarette butts make up nearly one-third of all litter by count. They are non-biodegradable, leach harmful chemicals into our soil and ocean, and provide no health benefit to smokers. Despite their small size, their collective impact is enormous: contaminating storm drains, poisoning marine life, and adding to the growing burden of microplastics in our environment.

Santa Cruz recently took bold, commonsense action to ban plastic cigarette filters, setting a precedent for coastal communities across California. San Francisco—long recognized as a leader in environmental protection—now has the opportunity to do the same.

On October 29, a coalition of advocates, scientists, and community members will gathered at Manny's for The Cigarette Surfboard film screening and action night. This event, featured Senator Scott Wiener, City Attorney David Chiu, and environmental leaders from across the state, shone a spotlight on the devastating impact of cigarette filter pollution and mobilize public support for policy change.

We have the data, the precedent, and the public will. What we need now is political leadership to turn awareness into action. I respectfully ask that you work with your colleagues to introduce or back legislation to phase out or ban plastic cigarette filters in San Francisco.

Together, we can keep toxic waste off our streets and beaches, protect marine ecosystems, and set a model for the rest of the state—and the nation.

Thank you for your time, leadership, and continued commitment to environmental stewardship.

With respect and urgency.

isabelle speers
ispeers28@gmail.com
1217 broadway
SAN FRANCISCO, California 94109

**From:** Antoinette Banks
**To:** Board of Supervisors (BOS)
**Subject:** It's Time for San Francisco to Ban Plastic Cigarette Filters
**Date:** Tuesday, December 2, 2025 8:56:21 AM

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

SF Board of Supervisors ,

I'm writing to urge you to introduce or support legislation to ban plastic cigarette filters in San Francisco. These filters—commonly known as cigarette butts—are the single most littered item on our planet and one of the most toxic forms of plastic pollution affecting our city's streets, parks, and waterways.

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Together, we can keep toxic waste off our streets and beaches, protect marine ecosystems, and set a model for the rest of the state—and the nation.

Thank you for your time, leadership, and continued commitment to environmental stewardship.

With respect and urgency.

Antoinette Banks
antoinette.esq@gmail.com
488 Union St
San Francisco, California 94133

**From:** Lili Tan
**To:** Board of Supervisors (BOS)
**Subject:** It's Time for San Francisco to Ban Plastic Cigarette Filters
**Date:** Tuesday, December 2, 2025 10:01:45 AM

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

SF Board of Supervisors ,

I'm writing to urge you to introduce or support legislation to ban plastic cigarette filters in San Francisco. These filters—commonly known as cigarette butts—are the single most littered item on our planet and one of the most toxic forms of plastic pollution affecting our city's streets, parks, and waterways.

Each year, cigarette butts make up nearly one-third of all litter by count. They are non-biodegradable, leach harmful chemicals into our soil and ocean, and provide no health benefit to smokers. Despite their small size, their collective impact is enormous: contaminating storm drains, poisoning marine life, and adding to the growing burden of microplastics in our environment.

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Thank you for your time, leadership, and continued commitment to environmental stewardship.

With respect and urgency.

Lili Tan
Cynthialilitan@gmail.com
1776 Sacramento street apt 503
San Francisco, California 94109

**From:** Yasha Wallin
**To:** Board of Supervisors (BOS)
**Subject:** It's Time for San Francisco to Ban Plastic Cigarette Filters
**Date:** Tuesday, December 2, 2025 1:20:22 PM

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

SF Board of Supervisors ,

I'm writing to urge you to introduce or support legislation to ban plastic cigarette filters in San Francisco. These filters—commonly known as cigarette butts—are the single most littered item on our planet and one of the most toxic forms of plastic pollution affecting our city's streets, parks, and waterways.

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Together, we can keep toxic waste off our streets and beaches, protect marine ecosystems, and set a model for the rest of the state—and the nation.

Thank you for your time, leadership, and continued commitment to environmental stewardship.

With respect and urgency.

Yasha Wallin
ywallin@gmail.com
2511A POLK ST 2511A POLK ST
SAN FRANCISCO, California 94109-1606

**From:** Susan Ford
**To:** Board of Supervisors (BOS)
**Subject:** It's Time to Ban Plastic Cigarette Filters in San Francisco
**Date:** Tuesday, December 2, 2025 8:31:10 PM

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

SF Board of Supervisors ,

I'm writing to urge you to ban plastic cigarette filters in SanFrancisco. These filters—commonly known as cigarette butts—are the single most littered item on our planet and one of the most toxic forms of plastic pollution affecting our city's streets, parks, and waterways.

Each year, cigarette butts make up nearly one-third of all litter by count. They are non-biodegradable, leach harmful chemicals into our soil and ocean, and provide no health benefit to smokers. Despite their small size, their collective impact is enormous: contaminating storm drains, poisoning marine life, and adding to the growing burden of microplastics in our environment.

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Thank you for your time, leadership, and continued commitment to environmental stewardship.

With respect and urgency.

Susan Ford
susan.ford103@gmail.com
Green Street
san Francisco, California 94133

**From:** Gregory Boudreau-fine
**To:** Board of Supervisors (BOS)
**Subject:** It's Time for San Francisco to Ban Plastic Cigarette Filters
**Date:** Wednesday, December 3, 2025 10:09:37 AM

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

SF Board of Supervisors ,

I'm writing to urge you to introduce or support legislation to ban plastic cigarette filters in San Francisco. These filters—commonly known as cigarette butts—are the single most littered item on our planet and one of the most toxic forms of plastic pollution affecting our city's streets, parks, and waterways.

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Together, we can keep toxic waste off our streets and beaches, protect marine ecosystems, and set a model for the rest of the state—and the nation.

Thank you for your time, leadership, and continued commitment to environmental stewardship.

With respect and urgency.

Gregory Boudreau-fine
gregbfine@gmail.com
1450 VALLEJO ST, APT 401
SAN FRANCISCO, California 94109

**From:** Susan Fukuhara-ju
**To:** Board of Supervisors (BOS)
**Subject:** It's Time for San Francisco to Ban Plastic Cigarette Filters
**Date:** Wednesday, December 3, 2025 5:35:02 PM

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

SF Board of Supervisors ,

I'm writing to urge you to introduce or support legislation to ban plastic cigarette filters in San Francisco. These filters—commonly known as cigarette butts—are the single most littered item on our planet and one of the most toxic forms of plastic pollution affecting our city's streets, parks, and waterways.

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Together, we can keep toxic waste off our streets and beaches, protect marine ecosystems, and set a model for the rest of the state—and the nation.

Thank you for your time, leadership, and continued commitment to environmental stewardship.

With respect and urgency.

Susan Fukuhara-ju
Sfukuhara1688@gmail.com
273 Pixley Street
San Francisco, California 94123

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 9 Letters Regarding Market Street |
| **Date:** | Thursday, December 4, 2025 12:29:47 PM |
| **Attachments:** | 9 Letters Regarding Market Street.pdf |

Hello,

Please see attached 9 letters regarding vehicles on Market Street.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** Mark Fabela
**To:** Board of Supervisors (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** It's Time to Open Market Street to Vehicles
**Date:** Tuesday, November 25, 2025 12:27:25 PM

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Message to the Board of Supervisors,
Mayor, and SFMTA

From your constituent: Mark Fabela

Email: markdfabela@yahoo.com

Subject: It's Time to Open Market Street to Vehicles

Message:

Dear Mayor Lurie, Board of Supervisors and SFMTA Board,

Let's encourage San Francisco's recovery! It's time to open Market Street.

Let's compare Market St before & after:

- Pre-Closure: a healthy 5% commercial vacancy
- Post-Closure: a devastating 50% commercial vacancy

- Pre: vibrant and packed
- Post: vacant and depressing

- Pre-Closure: pedestrians were not regularly threatened by bikes, scooters, mopeds on the sidewalk
- Post-Closure: they are

(see: https://url.avanan.click/v2/r01/___https://x.com/LyanneMelendez/status/1957981359009665422___.YXAzOnNmZHQyOmE6bzphNWIzMDA4YjhkNDNhM2E5ZWRhMGQxMzU2ZGM3ZDAyNjo3OmM2YTA6M2FiZGU4NzA5MzM5YmE3YjY4NTE3OWQwZGYyNzJhMTMxOThiNjUyNWU4MDAzNDNjNjJlYzU0NTY4MTI0ZGEwYjp0OlQ6Tg)

Union Square has suffered at 40% loss in business.

An entire Mall has closed down.

Closing Market Street has objectively inflicted severe damage on this area of San Francisco.

I kindly encourage you to please end the destructive closure of Market Street.

Kind regards,

**From:** Michael Murano
**To:** Board of Supervisors (BOS); ChanStaff (BOS); Walton, Shamann (BOS); EasleyStaff; ChenStaff; MahmoodStaff; SauerStaff
**Subject:** It's Time to Open Market Street to Vehicles
**Date:** Tuesday, November 25, 2025 3:46:40 PM

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

Message to the Board of Supervisors,

Mayor, and SFMTA

From your constituent: Michael Murano

Email: mmurano@gmail.com

Subject: It's Time to Open Market Street to Vehicles

Message:

Dear Mayor Lurie, Board of Supervisors and SFMTA Board,

Let's encourage San Francisco's recovery! It's time to open Market Street.

Let's compare Market St before & after:

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(see: https://url.avanan.click/v2/r01/___https://x.com/LyanneMelendez/status/1957981359009665422___.YXAzOnNmZHQyOmE6bzpiNDhlZGI5Y2IxNjQ0YWM5OGU1NGY3ZTg2MmFmMjAxMTo3OmQ2OGQ6NTE5MjcyZWQ0NTQ0MmEwMjFlOWQxYWVhMDNhYjMxMTU2NzdjZmRmODdiZjhjOWY0OTM1MzNlY2YwZTI0ODk2NDp0OlQ6Tg)

Union Square has suffered at 40% loss in business.

An entire Mall has closed down.

Closing Market Street has objectively inflicted severe damage on this area of San Francisco.

I kindly encourage you to please end the destructive closure of Market Street.

Kind regards,

**From:** richard brandi
**To:** Board of Supervisors (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** It's Time to Open Market Street to Vehicles
**Date:** Monday, December 1, 2025 10:40:38 AM

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

Message to the Board of Supervisors,
Mayor, and SFMTA

From your constituent: richard brandi

Email: rbrandi@earthlink.net

Subject: It's Time to Open Market Street to Vehicles

Message:

Dear Mayor Lurie, Board of Supervisors and SFMTA Board,

Let's encourage San Francisco's recovery! It's time to open Market Street.

Let's compare Market St before & after:

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Union Square has suffered at 40% loss in business.

An entire Mall has closed down.

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I kindly encourage you to please end the destructive closure of Market Street.

Kind regards,

**From:** Vandana Di Scala
**To:** Board of Supervisors (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** It's Time to Open Market Street to Vehicles
**Date:** Monday, December 1, 2025 11:12:24 AM

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

Message to the Board of Supervisors,
Mayor, and SFMTA

From your constituent: Vandana Di Scala

Email: vandana1@gmail.com

Subject: It's Time to Open Market Street to Vehicles

Message:

Dear Mayor Lurie, Board of Supervisors and SFMTA Board,

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(see: https://url.avanan.click/v2/r01/___https://x.com/LyanneMelendez/status/1957981359009665422___.YXAzOnNmZHQyOmE6bzpkYjg0MDI4ZjRiYjlwNWZlMWFlNzg3NDI4MzJhMDMxMDo3Ojg4YTk6MWIwNWU5ODg2OTlkYjUzYWEyMzE5OThmYTJhYWRmYzFkNTg0ZjQzYTZhMTllOTI4OTczNzY1YWEyZTA4NWQxYjp0OlQ6Tg)

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I kindly encourage you to please end the destructive closure of Market Street.

Kind regards,

**From:** Adrienne Hoyer
**To:** Board of Supervisors (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FosterStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** It's Time to Open Market Street to Vehicles
**Date:** Monday, December 1, 2025 11:36:45 AM

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

Message to the Board of Supervisors,
Mayor, and SFMTA

From your constituent: Adrienne Hoyer

Email: amhoyer@sbcglobal.net

Subject: It's Time to Open Market Street to Vehicles

Message:

Dear Mayor Lurie, Board of Supervisors and SFMTA Board,

Let's encourage San Francisco's recovery! It's time to open Market Street.

Let's compare Market St before & after:

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(see: https://url.avanan.click/v2/r01/___https://x.com/LyanneMelendez/status/1957981359009665422___.YXAzOnNmZHQyOmE6bzowODJkZmM2ODhlMGYxZjZjMTJmZmQwMWQ4ODYwZmQ2MTc3OjNkMTY6ODk1NDVjMDJhZDNjMjBjZWNiMjRhYThkMjNjMGRhMjg3MGIzNWM5NWE5M2I0Yzk1MGMxZGM4ZWUzMmVkZDkwNDp0OlQ6Tg)

Union Square has suffered at 40% loss in business.

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I kindly encourage you to please end the destructive closure of Market Street.

Kind regards,

**From:** Kevin Wallace
**To:** Board of Supervisors (BOS); ChanStaff (BOS); Walton, Shamann (BOS); PeskinStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** It's Time to Open Market Street to Vehicles
**Date:** Monday, December 1, 2025 12:47:30 PM

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

Message to the Board of Supervisors,

Mayor, and SFMTA

| | |
|---|---|
| From your constituent | Kevin Wallace |
| Email | kevinwallace415@gmail.com |
| Subject | It's Time to Open Market Street to Vehicles |

Message:

Dear Mayor Lurie, Board of Supervisors and SFMTA Board,

Let's encourage San Francisco's recovery! It's time to open Market Street.

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Kind regards,

**From:** Vanessa Pacheco
**To:** Board of Supervisors (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** It's Time to Open Market Street to Vehicles
**Date:** Monday, December 1, 2025 9:31:15 PM

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Message to the Board of Supervisors,
Mayor, and SFMTA

From your constituent: Vanessa Pacheco

Email: vanessalp@sbcglobal.net

Subject: It's Time to Open Market Street to Vehicles

Message:

Dear Mayor Lurie, Board of Supervisors and SFMTA Board,

Let's encourage San Francisco's recovery! It's time to open Market Street.

Let's compare Market St before & after:

- Pre-Closure: a healthy 5% commercial vacancy
- Post-Closure: a devastating 50% commercial vacancy

- Pre: vibrant and packed
- Post: vacant and depressing

- Pre-Closure: pedestrians were not regularly threatened by bikes, scooters, mopeds on the sidewalk
- Post-Closure: they are

(see: https://url.avanan.click/v2/r01/___https://x.com/LyanneMelendez/status/1957981359009665422___.YXAzOnNmZHQyOmE6bzo1Njk1N2M3ODgyZWJlYTI2NWZkOWIzMTU5Mzc2ZWRhZTo3OjJiYzM6ZjhmYzNkZDBjYTk3ODJjNzE3NGY5NjNiYWNmN2Q1MWJjMGMyMTk2YjdlODU4YmJhYzZmMTEzMzUwZGIwMGQxZDp0OlQ6Tg)

Union Square has suffered at 40% loss in business.

An entire Mall has closed down.

Closing Market Street has objectively inflicted severe damage on this area of San Francisco.

I kindly encourage you to please end the destructive closure of Market Street.

Kind regards,

**From:** Karina Velasquez
**To:** Board of Supervisors (BOS); ChenStaff (BOS); Walton, Shamann (BOS); FielderStaff; ChenStaff; MahmoodStaff; SauterStaff
**Subject:** It's Time to Open Market Street to Vehicles
**Date:** Tuesday, December 2, 2025 8:10:10 AM

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

Message to the Board of Supervisors,
Mayor, and SFMTA

From your constituent: Karina Velasquez

Email: Karinawinder@gmail.com

Subject: It's Time to Open Market Street to Vehicles

Message:

Dear Mayor Lurie, Board of Supervisors and SFMTA Board,

Let's encourage San Francisco's recovery! It's time to open Market Street.

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Kind regards,

**From:** Cynthia Brown
**To:** Board of Supervisors (BOS); ChanStaff (BOS); Walton, Shamann (BOS); FielderStaff; PeskinStaff; MahmoodStaff; SauterStaff
**Subject:** It's Time to Open Market Street to Vehicles
**Date:** Tuesday, December 2, 2025 9:58:35 AM

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Message to the Board of Supervisors,

Mayor, and SFMTA

From your constituent: Cynthia Brown

Email: cymphany@hotmail.com

Subject: It's Time to Open Market Street to Vehicles

Message:

Dear Mayor Lurie, Board of Supervisors and SFMTA Board,

Let's encourage San Francisco's recovery! It's time to open Market Street.

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Kind regards,

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 93 Letters Regarding Muni Funding |
| **Date:** | Thursday, December 4, 2025 12:35:16 PM |
| **Attachments:** | 93 Letters Regarding Muni Funding.pdf |

Hello,

Please see attached 93 letters regarding Muni Funding.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

**From:** Katherine Esposito
**To:** Board of Supervisors (BOS)
**Subject:** Request for support for the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 6:13:30 AM

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

San Francisco Board of Supervisors,

I am writing to urge you to please support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs for countless individuals both visiting and living in San Francisco including myself. This will generate $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

- Grows Muni service,
- Funds it fairly,
- Protects tenants, and
- Sustains Muni into the future.

It ensures large commercial properties pay their share while everyday San Franciscans as well as those visiting our city continue to be able to get to work, school, and where they need to go. It exempts SSI/SSDI homeowners and 100% affordable housing, contains no passthroughs for rent-controlled tenants, and ties revenue to rising costs so improvements last.

San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Katherine
California

**From:** Olivia Strikowsky
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 7:24:42 AM

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Olivia
California

**From:** Alexandra Dortzbach
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 7:42:23 AM

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Alexandra
California

**From:** Christopher Cornell
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 8:04:05 AM

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Christopher
California

**From:** Sophia Andrikopoulos
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 8:08:35 AM

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Sophia
California

**From:** Carly Miller
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 8:08:51 AM

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Carly
California

**From:** Matthew Coleman
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 8:15:48 AM

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

San Francisco Board of Supervisors,

Mayor Lurie,

My name is Matthew Coleman, I am a transit advocate and former volunteer for the Prop L, Fund the Bus Campaign. I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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I spent 200+ hours signature collecting, lit dropping and canvassing for Prop L, all while having a full-time job. I knocked on hundreds of doors and spoke with a lot of people in different parts of the city. People want Muni service to get better and they want to bring back lines which we lost in COVID. If we do not bring back service and expand it, we are going to be back at the ballot again in 2028 asking for more money to bring back service. Advocates cannot keep going back to ask for funding for Muni because we refuse to not make people pay their fair share. Stop kicking the can down the road and fully fund Muni and expand service!

Matthew

Matthew

California

**From:** Alex Davies-Morris
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 8:18:30 AM

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Alex
California

**From:** Grant Nilson
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 9:39:14 AM

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Grant
California

**From:** Alejandra Torres
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 9:56:22 AM

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

San Francisco Board of Supervisors,

My name is Alejandra Torres and I'm a resident of the Sunset District. I utilize Muni every single day as my primary means of transportation. With the rising cost of living in the city, Muni (both the light rail system and the buses) has been a great resource for me to commute to work and school while keeping costs low. However the recent budget cuts have resulted in increased fare costs and less frequent/timely service which impacts my and my neighbors ability to get around the city.

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Alejandra
California

**From:** marissacornelius818@gmail.com
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 11:32:53 AM

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

San Francisco Board of Supervisors,

Hello, my name is Marissa and I am a resident of the Outer Sunset. I rely on Muni for so much, and this, I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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California

**From:** Tiana Oreglia
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 1:32:48 PM

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Tiana
California

**From:** Carolyn Grigas
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 3:37:52 PM

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Carolyn
California

**From:** Vincent Ye
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 3:48:01 PM

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Vincent
California

**From:** James Ye
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 3:49:29 PM

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James
California

**From:** michelle gonzalez
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 6:34:06 PM

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michelle
California

**From:** nikhil d
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 6:42:54 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

- Grows Muni service,
- Funds it fairly,
- Protects tenants, and
- Sustains Muni into the future.

It ensures large commercial properties pay their share while everyday San Franciscans continue to be able to get to work, school, and where they need to go. It exempts SSI/SSDI homeowners and 100% affordable housing, contains no passthroughs for rent-controlled tenants, and ties revenue to rising costs so improvements last.

San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

nikhil
California

**From:** Sophia Gigliotti
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 8:15:05 PM

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Sophia
California

**From:** Zoe Williams
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 9:33:11 PM

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Zoe
California

**From:** Lara Schaffer
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Tuesday, December 2, 2025 10:03:54 PM

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system. Cutting muni is shows you do not care about working San Franciscans. We don't want more Waymo or Lyft or uber we want AFFORDABLE PUBLIC TRANSIT

Lara
California

**From:** Veronica Toccaceli
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 7:40:32 AM

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Veronica
California

**From:** Bailey Beauchamp
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 8:33:17 AM

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Bailey
California

**From:** Isaac Luiz
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 9:23:36 AM

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San Francisco Board of Supervisors,

Hello Mayor Lurie & Council Member Mahmood,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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I appreciate your team taking the time to read this letter,

Isaac

Isaac
California

**From:** Ingrid Rechtin
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 9:49:38 AM

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Ingrid
California

**From:** Iris Biblowitz
**To:** Board of Supervisors (BOS)
**Subject:** As a nurse and senior, I"m asking you to support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 10:22:03 AM

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Iris
California

**From:** Marissa Winkler
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 10:08:52 AM

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Marissa
California

**From:** Seanna Vien
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 1:49:32 PM

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Seanna
California

**From:** jessica finn
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 2:47:59 PM

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jessica
California

**From:** Alison Wu
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 3:36:27 PM

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Alison
California

**From:** Cassandra Cruz
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 4:19:18 PM

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San Francisco Board of Supervisors,

Please tax the large corporations more to pay for free buses!!!

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Cassandra
California

**From:** Paige MacLaren
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 4:35:30 PM

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Paige
California

**From:** Cora Palmer
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 4:54:23 PM

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Cora
California

**From:** Rishi Viswanathan
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 5:24:18 PM

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Rishi
California

**From:** Tyler Moselle
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 5:26:56 PM

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Tyler
California

**From:** Gaurav Sharma
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 5:49:38 PM

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Gaurav

**From:** Celia Hester
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 5:59:25 PM

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Celia
California

**From:** Megan Luby
**To:** Board of Supervisors (BOS)
**Subject:** Support Muni Forever funding proposal!
**Date:** Monday, December 1, 2025 6:01:25 PM

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Megan
California

**From:** Anisya Lustig-Ellison
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 7:22:21 PM

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Anisya
California

**From:** Slin Lee
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 7:24:23 PM

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

San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

- Grows Muni service,
- Funds it fairly,
- Protects tenants, and
- Sustains Muni into the future.

It ensures large commercial properties pay their share while everyday San Franciscans continue to be able to get to work, school, and where they need to go. It exempts SSI/SSDI homeowners and 100% affordable housing, contains no passthroughs for rent-controlled tenants, and ties revenue to rising costs so improvements last.

San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Slin
California

**From:** Robert Ensor
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 8:02:48 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

As a person who relies on MUNI, I do not want my services further cut. I cannot rely on the 6 the way it is and the 7 is already overcrowded. With the way service is and the fares I am paying, it feels as if I am being ripped off. I do not want to continue to have continuous fare increases that lead me to either owning a car or leaving San Francisco all together. It is not a sustainable option for me. I want to have a safe, clean, reliable MUNI that is resilient and one that I can trust. Because I don't want City or Federal governments dictating how I get around or how I move. Period.

Robert
California

**From:** Melinda Huot
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 8:14:36 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Sincerely,
Melinda H
D5

Melinda
California

**From:** Raina Peng
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 8:14:36 PM

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Raina
California

**From:** Christopher Pederson
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 8:15:32 PM

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Christopher
California

**From:** allegra.mautner@gmail.com
**To:** Board of Supervisors (BOS)
**Subject:** You must support Muni Forever funding!
**Date:** Monday, December 1, 2025 9:41:12 PM

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San Francisco Board of Supervisors,

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California

**From:** Felicia Tacto
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 10:47:13 PM

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Felicia
California

**From:** Evan Melendez
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 11:12:04 PM

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Evan
California

**From:** Myles Soderstrom
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 11:14:55 PM

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Myles
California

**From:** Lizzie Siegle
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Monday, December 1, 2025 11:32:52 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Lizzie
California

**From:** Evan Elias
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 11:45:51 AM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

A strong reliable public transit system benefits all San Franciscans. It reduces traffic congestion, carbon emissions, air pollution, and road wear and tear. It is also an essential part of an equitable city, that allows everybody to get to where they need to go. A well-functioning MUNI also encourages less car ownership. Public transit needs to be a central part of reducing fossil fuel emissions.

This city service that benefits everybody needs to have steady funding. We need MUNI to have a steady source of income to provide reliable service. This will increase ridership.

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Evan
California

**From:** Eric Chen
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 12:49:14 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Eric
California

**From:** Michela Garber
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 12:49:24 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Michela
California

**From:** Edward Parillon
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 12:53:14 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Edward
California

**From:** Maya Chaffee
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 1:08:28 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

Im a low income renter in a rent controlled unit. I can only afford to live in this city because of its good transit and having fixed rent. If my rent is increased due to passthurs and muni service is cut becatse they dont get the funding they need to improve service i will have to move out of the city.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why the proposal:

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

-From a resident who loves this city and wants low income and those withought cars like me to thrive

Maya
California

**From:** Ruth Malone
**To:** Board of Supervisors (BOS)
**Subject:** Please support Muni Forever funding proposal
**Date:** Friday, November 28, 2025 1:37:51 PM

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

San Francisco Board of Supervisors,

As car-free seniors and always-voters, we depend on MUNI and safe bicycle infrastructure for transportation. Supporting these is direct climate action and contributes to reducing car fatalities. Please support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. We will vote for it!

This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery. We need bold leadership, not partial measures.

The MUNI Forever proposal:

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It ensures large commercial properties pay their share while everyday San Franciscans continue to be able to get to work, school, and where they need to go. It exempts SSI/SSDI homeowners and 100% affordable housing, contains no passthroughs for rent-controlled tenants, and ties revenue to rising costs so improvements last.

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Ruth
California

**From:** Tim Courtney
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 1:40:50 PM

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Tim
California

**From:** parkerday@gmail.com
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 1:41:39 PM

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San Francisco Board of Supervisors,

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California

**From:** Harold Findley
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 1:48:41 PM

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San Francisco Board of Supervisors,

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Harold
California

**From:** Joey Lusterman
**To:** Board of Supervisors (BOS)
**Subject:** support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 1:57:40 PM

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San Francisco Board of Supervisors,

Dear Mayor Baby Boy,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Joey
California

**From:** Eric Douglass
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 2:35:06 PM

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Eric
California

**From:** Cyrus Hall
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 7:36:28 PM

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San Francisco Board of Supervisors,

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Cyrus
California

**From:** elliot helman
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Friday, November 28, 2025 8:21:38 PM

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

San Francisco Board of Supervisors,

I live in Mission Bay and I use Muni almost every day. I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

- Grows Muni service,
- Funds it fairly,
- Protects tenants, and
- Sustains Muni into the future.

It ensures large commercial properties pay their share while everyday San Franciscans continue to be able to get to work, school, and where they need to go. It exempts SSI/SSDI homeowners and 100% affordable housing, contains no passthroughs for rent-controlled tenants, and ties revenue to rising costs so improvements last.

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elliot
California

**From:** Micah Murray
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Saturday, November 29, 2025 1:13:42 AM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Micah
California

**From:** Rishav Rout
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Saturday, November 29, 2025 10:03:47 AM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

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Rishav
California

**From:** Jordan Whiteley
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Saturday, November 29, 2025 1:04:38 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Jordan
California

**From:** Duong Vu
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Saturday, November 29, 2025 8:18:55 PM

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

San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

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Duong
California

**From:** Natalia Rodrigues
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Saturday, November 29, 2025 9:15:45 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Natalia
California

**From:** Elias Zamaria
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Saturday, November 29, 2025 11:27:47 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Elias
California

**From:** Chelsey Lerner
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 7:59:16 AM

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

San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Chelsey
California

**From:** Lisa Hamilton
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 11:15:24 AM

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

San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.
I take Muni multiple times a day and it's what makes San Francisco what it is. It's one of the most transit friendly cities in the United States and needs to stay that way.
If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

- Grows Muni service,
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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Lisa
California

| | |
|---|---|
| **From:** | Cole Brinsfield |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Please support the Muni Forever funding proposal and give the city a future where Muni not only survives, but thrives. |
| **Date:** | Sunday, November 30, 2025 11:49:29 AM |

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

San Francisco Board of Supervisors,

As a San Francisco resident without a car, MUNI's success much echos that of my own life. Its how I get to work, to friends, to dates, to hobbies. Residents like me are already feeling the effects of the MUNI fiscal crisis - the cuts to the 6 and 21 this past summer have already drastically affected myself and others in my neighborhood. I personally saw my commute time double (from 30m to an hour) because of these changes. And this is on top of a post-pandemic Muni service pattern that's still running less service than prior to the pandemic. The loss of lines like the E embarcadero, 10 Townsend, and 47 Van Ness has continued to fracture the mobility of myself and my neighbors. We desperately need a funding measure that will get people excited about Muni's future, and that's a measure that includes a growth of service. The current proposals I have seen from the mayor's office are almost designed to fail, they don't fully close the funding gap and rely on unspecified future emergency measures to make Muni right, they have tenant passthrough, and give Muni no hope of e service expansion.

There's no way I can knock on doors leading up to this election and tell my neighbors, "hey, you should support this MUNI funding measure that doesn't actually fix the financial crisis, will let your landlord charge you more rent, and also by the way, won't even bring back the original route of the 6".

If I'm able to tell my neighbors "hey support this measure that will give Muni full funding and expand service", then I promise you I'll knock doors 'till my knuckles are raw.

For this reason, I strongly urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco’s economic recovery.

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Thank you,
Cole Brinsfield
D8 resident

Cole
California

**From:** Tara Roudi
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 12:21:32 PM

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San Francisco Board of Supervisors,

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Also please increase service of the N in the mornings between 8-930am it should be running every 5 minutes. The current frequency means the trains are completely filled to capacity and very dangerous.

Tara
California

**From:** Aurey Liu
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 4:45:20 PM

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Aurey
California

**From:** Audrey Liu
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 4:48:04 PM

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Audrey
California

**From:** Thor Swift
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 4:48:43 PM

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Thor
California

**From:** Kenny Crone
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 5:40:57 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Kenny
California

**From:** Carol Brownson
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 5:41:15 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Carol
California

**From:** Aaron Brick
**To:** Board of Supervisors (BOS)
**Subject:** Fund MUNI today!
**Date:** Sunday, November 30, 2025 5:42:05 PM

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

San Francisco Board of Supervisors,

Please support the Muni Forever proposal for a parcel tax.

It ensures large commercial properties pay their share while everyday San Franciscans continue to be able to get to work, school, and where they need to go. It exempts SSI/SSDI homeowners and 100% affordable housing, contains no passthroughs for rent-controlled tenants, and ties revenue to rising costs so improvements last.

San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

Thanks for your time.

Aaron Brick.

Aaron
California

**From:** SARA MILES
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 6:53:38 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This is a key issue for me and other seniors in the city: We depend on Muni every day.
We cannot depend on commercial transportation companies that keep raising their prices and clogging our streets. A city as great as ours deserves reliable, comprehensive public transportation.
If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

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It ensures large commercial properties pay their share while everyday San Franciscans continue to be able to get to work, school, and where they need to go. It exempts SSI/SSDI homeowners and 100% affordable housing, contains no passthroughs for rent-controlled tenants, and ties revenue to rising costs so improvements last.

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SARA
California

**From:** Sarah Katz-Hyman
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Sunday, November 30, 2025 8:36:42 PM

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

San Francisco Board of Supervisors,

Hello -

I ride Muni everyday and depend on Muni to get to work, errands, shopping, entertainment, and truth be told, I could not afford to live in this city if I did not have access to Muni. The last round of Muni cuts effects the district I live in (D5) more than any other district in SF and I can tell you, we are feeling it and if the city cannot bring back this service and resorts to funding measure that barely maintain or require further cuts the city's affordability, livability, and economic recovery will suffer.

That is why I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

It is not enough to just keep Muni afloat only for the agency (and our city) to be in the same position when the next crisis, emergency, or unfriendly federal or state government budget hits. We need to do our part as a city and live up to our transit first charter!

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

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San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system.

I believe that the vast majority of people and businesses in San Francisco understand that

Muni must not only survive but thrive and expand and the Muni Now Muni Forever proposal is that answer.

Be a champion for our city, be a champion for our transit, be a champion for our future.

Thank you -

Sarah Katz-Hyman
D5 resident, daily Muni rider

Sarah
California

**From:** Eleanor Stokes
**To:** Board of Supervisors (BOS)
**Subject:** Mayor Lurie, Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 12:03:18 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

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- Protects tenants, and
- Sustains Muni into the future.

It ensures large commercial properties pay their share while everyday San Franciscans continue to be able to get to work, school, and to events and businesses that help our economy thrive. It exempts SSI/SSDI homeowners and 100% affordable housing, contains no passthroughs for rent-controlled tenants, and ties revenue to rising costs so improvements last.

San Francisco needs a strong, reliable transit system and it needs one that is fully funded and successful at the ballot box. I ask you to publicly endorse and champion Muni Now Muni Forever—a people-powered, community-first plan to secure the future of our transit system. Please appeal to the general public and follow in people-first solutions rather than investing in for-profit ventures like Waymo. Thank you so much for helping us!

Eleanor
California

**From:** James Le
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 12:36:08 PM

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

San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

- Grows Muni service,
- Funds it fairly,
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James
California

**From:** Eric Foote
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 12:51:18 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Eric
California

**From:** Jennifer Keith
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 1:01:35 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Jennifer
California

**From:** Rene Zadoorian
**To:** Board of Supervisors (BOS)
**Subject:** Please SUPPORT! Muni funding proposal
**Date:** Wednesday, December 3, 2025 3:42:08 PM

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

San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Rene
California

**From:** AJ cho
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 4:51:27 PM

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San Francisco Board of Supervisors,

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AJ
California

**From:** Sailor Galaviz
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 6:21:42 PM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Sailor
California

**From:** Montana Lahey
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 6:30:26 PM

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San Francisco Board of Supervisors,

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Montana
California

**From:** Carrie Karlovic
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 7:38:30 PM

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San Francisco Board of Supervisors,

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Carrie
California

**From:** kathie Piccagli
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 8:05:34 PM

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San Francisco Board of Supervisors,

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kathie
California

**From:** Kate Agathos
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Wednesday, December 3, 2025 10:28:11 PM

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San Francisco Board of Supervisors,

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Kate
California

**From:** Betty Kissilove
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Thursday, December 4, 2025 1:21:28 AM

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San Francisco Board of Supervisors,

I'm calling on you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

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Betty
California

**From:** Louisa Stevens
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Thursday, December 4, 2025 7:50:06 AM

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San Francisco Board of Supervisors,

I am writing to urge you to support the Muni Forever proposal for a parcel tax to fund Muni for the November 2026 ballot. This proposal provides the funding Muni needs—generating $262 million to restore and grow service, reduce crowding, improve reliability, and strengthen San Francisco's economic recovery.

As someone who does not own a car and who takes Muni every day to get to work and already experiences service delays and crowding regularly, further budget cuts would severely impact my ability to live well in this city.

If we want to save Muni, we can't rely just on measures that only gets us partial funding or can't win at the ballot box. That's why our proposal:

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Louisa
California

**From:** Anushka Aponsu
**To:** Board of Supervisors (BOS)
**Subject:** Please support the Muni Forever funding proposal
**Date:** Thursday, December 4, 2025 8:57:06 AM

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San Francisco Board of Supervisors,

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Anushka
California

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Behested Payment Comments with a Possible Partial Solution |
| **Date:** | Thursday, December 4, 2025 11:39:28 AM |

Hello,

Please see below communication regarding behested payments.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

**From:** sfneighborhoods.net <info@sfneighborhoods.net>
**Sent:** Thursday, December 4, 2025 11:22 AM
**To:** Chan, Connie (BOS) <connie.chan@sfgov.org>; Sherrill, Stephen (BOS) <Stephen.Sherrill@sfgov.org>; Sauter, Danny (BOS) <Danny.Sauter@sfgov.org>; Alan.Wong@sfgov.org; Mahmood, Bilal (BOS) <bilal.mahmood@sfgov.org>; Dorsey, Matt (BOS) <matt.dorsey@sfgov.org>; Melgar, Myrna (BOS) <myrna.melgar@sfgov.org>; Mandelman, Rafael (BOS) <rafael.mandelman@sfgov.org>; Fielder, Jackie (BOS) <Jackie.Fielder@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>; Chen, Chyanne (BOS) <Chyanne.Chen@sfgov.org>; Ethics Commission, (ETH) <ethics.commission@sfgov.org>; Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Subject:** Behested Payment Comments with a Possible Partial Solution

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

While some supervisors may think that the restrictions on behested payments make them less effective and productive as a supervisor, it is important for them to remember that the overarching effectiveness of anything they do be transparent and done with integrity. The reason voters voted for changes with Prop E (6/7/2022) to “Chapter 6: Behested Payment Reporting” was because of corrupt or questionable “behested payments” in San Francisco. While a supervisor may see themselves as doing their job with the utmost integrity, the behested payment rules exist to define that integrity for all city officials that make behested payments now and in the future.

Behested payments occupy a gray space where there is a power imbalance that the city official has over the person/company they are making the request of, if that person/company has business before that official. The city official wins politically. The recipient wins. For the behested payer, it depends on whether they consider it a benefit or a shakedown.

One problem with behested payments is the reduced ability of the behested payer to say no, and not thinking they will suffer repercussions on any business they have before the city. While behested payments over $1,000.00 need to be reported, the exact opposite is not true for a person/company saying no to a behested payment, even though the repercussions for that person/company could be of greater value than $1,000.00. Behested payment requests create an uneven playing field, where a person/company is put in a position where it is hard to say no and jeopardize their business before the city. The full Board of Supervisors giving a wavier to one supervisor's behested payment request does not help the imbalance, or even a waiver requested by a City Department request which is allowed. A Board of Supervisor’s waiver does the opposite and further puts pressure on the payer.

To me, the behested payment requests come across as a government-sponsored “go fund me” request, but with specific parties.

A government “go fund me” could be a vetted public list of entities on a webpage of what is looking for funding. A government “go fund me” would not require the government to transfer or hold money. A government “go fund me” would have the advantage that anyone or companies could donate to one or multiple needs. Essentially, you broaden the funder pool and take some of the pressure off from an arm-twisting behested payment. A funder would have the ability to say no or vary the amount donated. The who and donation amounts would be tracked until the goal is met. The broader pool of donors with less direct behested payment requests may lessen ethical problems. Broader requests and funding participation lessen the chance of corruption. Specific parties in a behested payment greater chance of quid pro quo and corruption.

There would still have to be behested request reporting if a behested request is made through the list or off the San Francisco “go fund me” list, or is a request for a specific service that only one or a few people/companies could provide. Would the San Francisco “go fund me” list be more work than Supervisor voting on waivers? It would really depend on how big the list would be or become.

sullivan
sfneighborhoods.net

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | FW: Public Comment for SFAC, SFRPD, SFBOS meetings + Immediate Disclosure Request |
| **Date:** | Thursday, December 4, 2025 11:04:34 AM |

Hello,

Please see below communication regarding the Vaillancourt Fountain.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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---

**From:** Sean Feeney <sean.feeney@rocketmail.com>
**Sent:** Thursday, November 27, 2025 11:48 AM
**To:** Collins, Charles (ART) <charles.collins1@sfgov.org>; Dhaliwal, Manraj (ART) <manraj.dhaliwal@sfgov.org>; Ferras, Suzie (ART) <suzie.ferras@sfgov.org>; ART-Info <ART-Info@sfgov.org>; Madland, Sarah (REC) <sarah.madland@sfgov.org>; Ginsburg, Phil (REC) <phil.ginsburg@sfgov.org>; Commission, Recpark (REC) <recpark.commission@sfgov.org>; Goodwin, Eoanna (REC) <eoanna.Goodwin@sfgov.org>; Summers, Ashley (REC) <ashley.summers@sfgov.org>; SauterStaff <SauterStaff@sfgov.org>; Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
**Cc:** info@docomomo-noca.org
**Subject:** Public Comment for SFAC, SFRPD, SFBOS meetings + Immediate Disclosure Request

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

Good morning.

I arrived at your email addresses via a link with a message that was already composed, but I am prefacing it with my own thoughts, which of course arrive too late.

I am very disturbed at the news that San Francisco's Arts Commission and Parks & Rec. Department have decided conclusively to tear down the landmark Vaillancourt Fountain. It's been known for a while that Justin Herman/Embarcadero Plaza is going to be modified beyond recognition — despite it being designed by Lawrence Halprin, one of the world's most renowned landscape architects — but it was my hope along with countless others that Vaillancourt Fountain would be allowed to remain. Sadly, this is not to be the case.

Since I am addressing this to the SF Arts Commission and Parks and Rec., it should not be necessary to give you a lesson on the importance of the fountain. But I would like to highlight the following:

- Brutalist, or raw concrete, architecture has been under fire, particularly in the United States and England, either by being demolished or by failing to maintain such examples to the point where demolition is inevitable.
- There is a clear line from the egalitarian nature of these projects and the publics they were designed for, through to their decline. These outcomes are political, I won't detail them here. But if the City's own Arts Commission, in a city known for its arts heritage, cannot see the tremendous value in the Vaillancourt Fountain, I wonder what of what use is the Commission.
- The costs to repair the fountain's water circulation system and its support infrastructure must be wildly inflated. To do these repairs cannot cost almost as much as demolishing, redesigning and rebuilding the entire plaza.
- The last-minute possibility of the fountain being disassembled and the pieces stored elsewhere is unlikely and implausible. This is a large and heavy piece, and would involve a team trained in such things; there obviously are not many with this training, and it raises questions about where it would be stored, and any future home, not to mention that if these funds are available, why they were not used for maintenance initially.
- The fountain has always been a City "must-see", and the subject of countless photos by tourists as well as locals. Many of these photos depict people enjoying it by walking through, under, and on areas designed for such use, and show the

success of its intent as a publicly-accessible installation.
- When it comes to reviewing or offering opinion on almost anything, the concept of negativity bias is at play, and Vaillancourt Fountain is no exception. Despite a number of loud voices expressing their hate for the fountain — and brutalism in general — there is a much larger number of people with a positive impression who didn't voice those thoughts.

I feel strongly about this, and could go on, but I've taken enough of your time. It's unlikely if I had written to you earlier the outcome would be any different, but I had to write to express my strong disapproval of the actions of the SF Arts Commission and Parks & Rec. and the destruction of Vaillancourt Fountain.

You will miss it when it's gone. We all will.

**Sean Feeney**
The Tenderloin, San Francisco
415.423.7129
sean.feeney@rocketmail.com

To SF Recreation & Parks, SF Arts Commission, SF Board of Supervisors,

San Francisco Recreation and Park Department approach to this project echoes our era of urban renewal.

Embarcadero Plaza has been a contributor to the Market Street Cultural Landscape District since 2016, which is a historic resource listed in the California Register of Historical Resources. This Lawrence Halprin-designed public space symbolizes our city's diverse history and has been the site of civic engagement and freedom of expression for decades, including this year.

The Vaillancourt Fountain is an international landmark, symbolizing our city's diverse history, our relationship with Canada and Quebec, and countless gatherings and activist events.

I oppose blank-slate urban redevelopment. Instead, I request that you:

• (1) Rightsize the project: In an era of economic uncertainty, you have a responsibility to

better spend $15-30+ million in public and private funds. This could include a more modest park refresh with a sustainable maintenance plan that would more effectively reflect the needs of residents, businesses, and visitors, and support downtown's economic recovery, while retaining our history and culture.
• (2) Engage in bona fide conceptual exploration: Require a bona fide exploration of designs that go beyond what was proposed by private interests in 2024. This could include adaptive reuse of Embarcadero Plaza to address accessibility issues while retaining the existing Lawrence Halprin design that is in the spirit of flexible, multi-use, world-renowned Spanish plazas and Italian piazzas.
• (3) Begin proactive engagement with experts: You proactively grant stakeholders other than project sponsors—such as the architects, artists, or recognized art and preservation organizations—the opportunity to present at official proceedings.
• (4) Commit to full disclosure and transparency: You require project sponsors to publicly communicate the full scope of the project. This includes Embarcadero Plaza South, Sue Bierman Park West, Phase 2, and plans for site features like bocce courts, padel courts, and the Abraham Lincoln Brigade Monument.

Please include this as a public comment—either as general public comment or associated with a more specific agenda item—for the next occurrence of these meetings:

• (1) SF Arts Commission - Civic Design Review Committee meeting
• (2) SF Arts Commission - Full Commission meeting
• (3) SF Recreation and Park Commission meeting
• (4) SF Board of Supervisors

**Recreation & Parks**: Please complete an **Immediate Disclosure Request** by supplying to me via email the following simple and routine public records by the close of the next business day:
• 2025 Embarcadero Plaza HRR
• 2025 Sue Bierman Park HRR
• 2025 Vaillancourt Fountain HRR
• 2025 Vaillancourt Fountain Conditions Assessment
• 2024-05-10 BxP Presentation BXP version
• MAP Embarcadero Plaza Maintenance Responsibilities
• Justin Herman Embarcadero Plaza - Maintenance Agreement Docs, 1998-2000 (not in order)
• Embarcadero Donor Presentation

- Prospect List for Mayor and DDC
- 20250729 PDT Meeting slides.pdf
- The most recent Embarcadero Plaza project delivery meeting notes

Thank you.

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Jalipa, Brent (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 12 Letters Regarding File No. 250929 |
| **Date:** | Thursday, December 4, 2025 12:31:32 PM |
| **Attachments:** | 12 Letters Regarding File No. 250929.pdf |

Hello,

Please see attached 12 letters regarding **File No. 250929:**

Ordinance amending the Business and Tax Regulations Code to repeal the cannabis business tax beginning on January 1, 2026, and remove references to the cannabis business tax from the common administrative provisions of the Code.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

| | |
|---|---|
| **From:** | Jessica |
| **To:** | Board of Supervisors (BOS) |
| **Cc:** | Mayor, MYR (MYR) |
| **Subject:** | Vote YES on Bill #250929 — Protect SF Patients |
| **Date:** | Wednesday, November 26, 2025 9:12:31 AM |

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

Hi, my name is Jess and I live in District 5. I'm writing to ask the Supervisor to vote YES on Bill #250929. Cannabis is medicine, most medications in CA are not taxed at all, and this tax increase will hurt patients and the small businesses we rely on. Please vote YES on repeal and protect compassionate access and the cannabis industry in San Francisco.

Thank you.

-Jessica

**From:** John Delaplane
**To:** Board of Supervisors (BOS)
**Cc:** Mayor, MYR (MYR)
**Subject:** Vote YES on Bill #250929 — Protect SF Patients
**Date:** Wednesday, November 26, 2025 12:37:16 PM

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

Greetings Honorable Supervisors and Mayor Lurie,

My name is John Delaplane and I am 20+ year SF Resident. I am also a voting father of two in District 5. My son attends SFUSD.

I support the full repeal of the local cannabis tax (Bill #250929). Cannabis is medicine — most medications in California are not taxed at all. Cannabis is vastly overtaxed compared to alcohol and tobacco. When state taxes briefly increased this year, patients immediately suffered. Another tax will cause real harm — especially to seniors, disabled residents, and low-income patients. Cannabis tourism will also suffer. The tax also undermines the city's social equity goals, harming social equity cannabis businesses that were supposed to get a leg up in the cannabis industry.

Please vote YES on repeal and protect compassionate access and the cannabis industry in San Francisco.

Thank you.

Sincerely,

John Delaplane

**From:** MCAGiraffe
**To:** Board of Supervisors (BOS); Mayor, MYR (MYR)
**Cc:** Chan, Connie (BOS); Sherrill, Stephen (BOS); Sauter, Danny (BOS); Mahmood, Bilal (BOS); Dorsey, Matt (BOS); Melgar, Myrna (BOS); Mandelman, Rafael (BOS); Fielder, Jackie (BOS); Walton, Shamann (BOS); Chen, Chyanne (BOS)
**Subject:** Support Repeal of the Local Cannabis Business Tax (File #250929)
**Date:** Sunday, November 30, 2025 3:50:58 PM

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

November 30, 2025

San Francisco Board of Supervisors

1 Dr. Carlton B. Goodlett Place

San Francisco, CA 94102

Re: Support Repeal of the Local Cannabis Business Tax (File #250929)

Dear Supervisors,

We are Michelle and Michael Aldrich, longtime San Francisco residents and advocates, who have devoted more than fifty years to ensuring that patients have safe, compassionate, and affordable access to cannabis. We have spent our lives working alongside community members, patients, caregivers, and policymakers to build the system San Francisco is known for today — one grounded in dignity, health, and harm reduction.

We are writing to urge you to support File #250929 and prevent the delayed 5% local Cannabis Business Tax from taking effect on January 1, 2026.

For decades, San Francisco led the nation in recognizing cannabis as medicine. We stood with patients through the AIDS epidemic, when cannabis was often the only thing easing pain, nausea, or the side effects of lifesaving medications. We worked to build compassion programs, safe distribution models, and supportive regulatory frameworks that protected the sick, the elderly, and the most vulnerable.

That legacy is now at risk.

If this tax takes effect, it will raise the cost of medicine for patients who are already struggling — seniors, disabled people, low-income residents, and those living with chronic conditions. Many of these individuals rely on cannabis simply to function day-to-day. A 5% increase will push some back toward unregulated sources, which is neither safe nor consistent with San Francisco's values.

The legal cannabis system is already overburdened by state taxes, federal 280E penalties, and rising operating costs. Community-based dispensaries — the same ones that built this movement, offered compassion discounts, and supported patients long before legalization —

cannot absorb another financial strain. Losing them would be a profound blow to public health and to the spirit of compassion this city helped pioneer.

We respectfully ask that you:

1. Advance File #250929 out of the Budget and Finance Committee;
2. Support its passage at the full Board; and
3. Protect access to safe, tested, regulated medical cannabis for the people who need it most.

San Francisco has always been a moral leader in cannabis policy. We hope you will uphold that legacy by ensuring patients are not priced out of the medicine that improves — and in many cases sustains — their daily lives.

Thank you for your time and thoughtful consideration.

Love, peace and health,

Michelle Aldrich

Michael Aldrich

Longtime Cannabis Advocates & Community Elders

**From:** William Dolan
**To:** Board of Supervisors (BOS)
**Subject:** Repeal the Local Cannabis Business Tax (File #250929)
**Date:** Sunday, November 30, 2025 10:36:12 PM

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

Dear Board of Supervisors,

My name is William Dolan, resident and business owner in D4. I am the owner, operator, and CEO of HYRBA located at 4033 Judah St. in the Outer Sunset. I am also an Equity Applicant and Board Member of the San Francisco Cannabis Alliance (SFCA) and member of the Brownie Mary Democratic Club.

I am writing to request the following.

- *We need your support to **repeal** the local Cannabis Business Tax (File #250929).*
- *Please move this item out of committee and schedule a public hearing immediately so patients and operators can be heard.*
- *Cannabis is essential medicine for many residents, and most Californians do not pay taxes on their medications.*
- *This tax will disproportionately harm independent operators, workers, and equity businesses.*
- *Implementing another tax will harm patients and undermine safe, regulated access.*
- *The temporary state tax increase earlier this year already reduced access and pushed consumers toward illicit options.*
- *San Francisco should be protecting compassionate access and supporting compliant operators, not adding additional financial barriers to an already contracting market.*

**Why This Matters**

If the tax is implemented:

- Consumer prices will increase across all retail operators in San Francisco.
- Access for medical patients, seniors, and people on fixed incomes will decrease.
- Small community-based dispensaries, and specifically Equity owned dispensaries, will struggle and/or close.
- Corporate operators (and illicit market sellers) will gain disproportionate advantage.
- The illicit market will strengthen and thrive; the regulated, legal market will continue to

contract.
- Retailers will face even greater regulatory and competitive pressure.

**Traditional medications in California are tax-exempt**, yet cannabis — the medicine many people rely on daily — continues to be burdened with multiple layers of taxation. This harms and penalizes both patients and compliant operators, while it rewards those operating in the illicit market.

Thank you for your support of our worthy cause to keep cannabis accessible, affordable, and readily available to the citizens of San Francisco. Please reach out if you have any questions or would like to discuss further.

William Dolan, Equity Applicant, Owner and CEO
--
will@hyrba.com
415.935.4743

**From:** Elaine Bell
**To:** Board of Supervisors (BOS)
**Cc:** Lurie, Daniel (MYR)
**Subject:** Upcoming 5% cannabis tax
**Date:** Monday, December 1, 2025 8:57:56 AM

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

Good morning! I hope all is well with you on this fine Monday. I'm writing to you to please vote yes on the bill that will stop the 5% cannabis tax that is due to take effect on January 1st of 2026. It will not only hurt the businesses that built this movement, it will also hurt folks like me that use cannabis as medicine because we can't use traditional medicine. Allergies and such. I myself am allergic to anti inflammatory drugs. They give me GI bleed. Cannabis balms and tinctures help my arthritis. Flower helps anxiety.
Thank you for your time and I hope you will consider the repeal of this unnecessary tax.

Sincerely,
Elaine B.

**From:** Patricia Flynn
**To:** Board of Supervisors (BOS)
**Cc:** Lurie, Daniel (MYR); Fielder, Jackie (BOS)
**Subject:** Vote YES on Bill #250929 — Protect SF Patients
**Date:** Monday, December 1, 2025 9:15:25 AM

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

I support full repeal of the local cannabis tax (Bill #250929). Cannabis is medicine, and most medications in California are not taxed at all. Patients already struggle with the highest taxes in the country. When state taxes briefly increased this year, patients immediately suffered. Another tax will cause real harm, especially to seniors, disabled residents, and low-income patients. Please vote YES on repeal and protect compassionate access in San Francisco.

**From:** Jim Misner
**To:** Board of Supervisors (BOS)
**Cc:** Lurie, Daniel (MYR)
**Subject:** re: Bill 250929
**Date:** Monday, December 1, 2025 9:17:25 AM

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

I support full repeal of the local cannabis tax (Bill #250929). Cannabis is medicine, and most medications in California are not taxed at all. Patients already struggle with the highest taxes in the country. When state taxes briefly increased this year, patients immediately suffered. Another tax will cause real harm, especially to seniors, disabled residents, and low-income patients. Please vote YES on repeal and protect compassionate access in San Francisco.
Respectfully,….Your constituent,

James Misner

**From:** J Alvarez
**To:** Board of Supervisors (BOS)
**Subject:** Cannabis tax
**Date:** Monday, December 1, 2025 9:42:38 AM

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

I support full repeal of the local cannabis tax (Bill #250929). Cannabis is medicine, and most medications in California are not taxed at all. Patients already struggle with the highest taxes in the country. When state taxes briefly increased this year, patients immediately suffered. Another tax will cause real harm, especially to seniors, disabled residents, and low-income patients. Please vote YES on repeal and protect compassionate access in San Francisco.

Sent from my T-Mobile 5G Device

Get Outlook for Android

**From:** Angela Montemayor
**To:** Board of Supervisors (BOS)
**Subject:** tax on Cannabis
**Date:** Monday, December 1, 2025 11:16:29 AM

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

Please stop the 5% tax that's coming on in January.
Everything is so expensive, food, gas, insurance, and lets not forget San Francisco super high rents. Please do not tax us more than we all ready are.
I am a medical marijuana user for my PTSD and physical pain. I can not afford to pay more with everything else being so high.

Best to you and yours,
Angela Montemayor

Yahoo Mail: Search, Organize, Conquer

| | |
|---|---|
| **From:** | Kenneth Alexander |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Vote YES on Bill#250929 - Protect SF Patients |
| **Date:** | Monday, December 1, 2025 5:32:17 PM |

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

I support full repeal of the local cannabis tax (Bill #250929). Cannabis is medicine, and most medications in California are not taxed at all. Patients already struggle with the highest taxes in the country. When state taxes briefly increased this year, patients immediately suffered. Another tax will cause real harm, especially to seniors, disabled residents, and low- income patients. Please vote YES on repeal and protect compassionate access in San Francisco.
Sent from my iPhone

**From:** Catherine Herrera
**To:** Board of Supervisors (BOS)
**Subject:** Vote YES on Bill #250929 — Protect SF Patients
**Date:** Tuesday, December 2, 2025 8:00:26 AM

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

Dear Board of Supervisors:

In 2008, I was receiving a routine blood draw when the nurse instead went into my arm nerve, drew a whole vial of blood, and my life was forever changed. I developed a rare condition on top of the nerve damage that impacted my mobility immediately.

Due to the fact I was injured at a hospital, I went through a traumatic experience in trying to get medical care, supportive devices and medication - since there is no cure and all medication is considered 'experimental.' The condition that resulted from the needle aspiration injury provokes the highest level of pain recorded by the medical field on the pain index, beyond cancer and childbirth. That level of pain was unbearable.

Someone suggested I try cannabis. I did not have money and relied on patient compassion programs to access the medicine. It took time but the cannabis helped regulate the pain, and even though I was in no way cured, I could start to function, to be able to eat, sleep and slowly, recover balance enough to be able to engage in my business and care for my family again. With that said, my abilities are still limited, require daily management and continue to limit income capacity.

It's not fair to tax cannabis while no taxes are applied on other medications.

Further, the City is offering financial incentives to profitable companies to locate here while charging extra taxes to seniors, disabled people and low-resourced residents who are dealing with increasing prices, and limited incomes. Already, Californians pay exorbitant prices for cannabis, and, compassion programs are gone. Many are forced to the off-market sources to save from taxes, risking unsafe conditions. These are not outcomes that support charging a small additional tax.

Please consider patients and fully repeal the local cannabis tax (Bill #250929). When state taxes briefly increased this year, patients immediately suffered. Another tax will cause real harm, especially to seniors, disabled residents, and low-income patients. Alternatively, grant a sales tax exemption for medical cannabis license holders.

Please vote YES on repeal and protect compassionate access in San Francisco.

Thank you for your consideration,

Catherine Herrera
SF Resident

| | |
|---|---|
| **From:** | Shannon McInerney |
| **To:** | Board of Supervisors (BOS) |
| **Cc:** | Mayor, MYR (MYR); Mandelman, Rafael (BOS) |
| **Subject:** | Vote YES on Bill #250929 — Protect SF Patients |
| **Date:** | Wednesday, December 3, 2025 4:04:28 PM |

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

Good Evening Everyone,

- I support full repeal of the local cannabis tax (Bill #250929).
- Cannabis is medicine — most medications in California are **not taxed at all**.
- Cannabis is vastly overtaxed compared to alcohol and tobacco.
- When state taxes briefly increased this year, patients immediately suffered.
- Another tax will cause real harm — especially to seniors, disabled residents, and low-income patients. Cannabis tourism will also suffer.
- Please vote YES on repeal and protect compassionate access and the cannabis industry in San Francisco.

**Shannon McInerney**
*PAX Labs Inc.*
*Customer Success Manager, Northern California*
415-730-8013 @therealshannabis
Trade Marketing Resources
KSS Live Menu | PAX Catalog

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; BOS Legislation, (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 9 Letters Regarding File No. 251098 |
| **Date:** | Thursday, December 4, 2025 12:29:05 PM |
| **Attachments:** | 9 Letters Regarding File No. 251098.pdf |

Hello,

Please see attached 9 letters regarding **File No. 251098:**

Hearing of persons interested in or objecting to the approval of a Conditional Use Authorization pursuant to Planning Code, Sections 209.2, 303, and 304 for a proposed project at 350 Amber Drive (Assessor's Parcel Block No. 7521, Lot No. 005) identified in Planning Case No. 2024-004318CUA, issued by the Planning Commission by Motion No. 21825, dated September 25, 2025, to install a new AT&T Macro Wireless Telecommunications Facility on an approximately 104 foot tall monopole, consisting of 12 new antennas, and nine new remote radio units and ancillary equipment within the P (Public) Zoning District and OS Height and Bulk District. (District 8) (Appellant: Mitchell M. Tsai of Mitchell M. Tsai Law Firm on behalf of the Diamond Heights Community Association) (Filed October 27, 2025).

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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**From:** arev2@pacbell.net
**To:** Board of Supervisors (BOS)
**Subject:** Proposed AT&T antenna at 350 Amber
**Date:** Wednesday, December 3, 2025 4:22:58 PM

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

Please, oh please oppose AT&T's construction of a 104' antenna at 350 Amber Dr. Among other serious reasons, I have a personal one: I experience chronic disabling vestibular migraines and severe vertigo; I believe EMT's are a possible factor.
**PLEASE OPPOSE THE CONSTRUCTION OF THIS ANTENNA.** I vote in every election.

Patricia Everall
236 Amber Dr
District 8

| | |
|---|---|
| **From:** | Christine Maralit |
| **To:** | Board of Supervisors (BOS); BOS Legislation, (BOS) |
| **Cc:** | Mitchell M. Tsai Attorney at Law, P.C.; Omar Corona; catherine dodd |
| **Subject:** | Appeal of Planning Commission"s CUP and Shadow Findings for 350 Amber Drive Project on September 25, 2025 - (2024-004318CUASHD) |
| **Date:** | Wednesday, December 3, 2025 11:04:04 AM |
| **Attachments:** | 20251203_350 Amber Drive_SF Board of Supervisors_December 9 Appeal Hearing_Correspondence ISO CUA Appeal_final.pdf |

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

Hello,

On behalf of Diamond Heights Community Association (Appellant), our office is submitting the attached correspondence in support of Appellant's appeal of the Conditional Use Authorization and Shadow Findings for the proposed development project at 350 Amber Drive in the City.

Please confirm receipt and acceptance.

Thank you,
Christine
--

Christine Maralit, Assistant Office Manager
Mitchell M. Tsai Law Firm - *Environmental and Land Use Litigation*
139 South Hudson Avenue Suite 200
Pasadena, CA 91101
Phone: (626) 314-3821
Fax: (626) 389-5414
Email: christinem@mitchtsailaw.com
Website: https://www.mitchtsailaw.com

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P: (626) 314-3821
E: info@mitchtsailaw.com

**Mitchell M. Tsai**
Law Firm

139 S. Hudson Ave., Suite 200
Pasadena, California 91101

**VIA E-MAIL**

December 3, 2025

City and County of San Francisco, Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102-4689
Em: Board.of.Supervisors@sfgov.org; bos.legislation@sfgov.org

**RE: Appeal of Planning Commission's Conditional Use Authorization and Shadow Findings for 350 Amber Drive Project on September 25, 2025 – (2024-004318CUASHD)**

Dear Board of Supervisors,

On behalf of Diamond Heights Community Association ("**Appellant**"), our Office is submitting this correspondence for the December 9, 2025 public hearing regarding appeals of the City and County of San Francisco ("**City**" or "**County**") Planning Commission's ("**Commission**") actions on September 25, 2025 for the development project proposed to be located at 350 Amber Drive in the City (Record No. 2024-004318ENV) ("**Project**"), including Approval of Conditional Use Authorization ("**CUA**") and Shadow Findings.

Appellant asserts that the Project Project's CUA and Shadow Findings are predicated on informational flaws and inconsistent with the City's land use policies, thereby requiring reversal of the Planning Commission actions on September 25, 2025. Appellant therefore respectfully submits that the Board of Supervisors ("**Board**") approve this appeal and reverse the Commission's approval of the CUA and Shadow Findings, for the Project. The Board should require Project modifications or conditions of approval to the CUA or Shadow Findings that address Appellant's environmental and public safety concerns.

The Diamond Heights Community Association is an organization of City residents and property owners near the Project site with a strong interest in well ordered land use planning and in addressing the environmental impacts of the Project, including potential impacts on the adjacent Glen Canyon Park and its natural and biological resources. Individual members of the Diamond Heights Community Association live,

work, and recreate in the Project vicinity and may therefore be directly affected by the Project.

The City describes the proposed Project as "the installation of a new AT&T Wireless Macro Wireless Telecommunications Services (WTS) Facility on an approximately 104-foot-tall monopole located at the rear of the San Francisco Police Academy. The WTS facility will consist of twelve (12) new antennas, nine (9) new remote radio units, three (3) tower mounted DC-9 surge suppressors, one (1) GPS unit mounted on proposed outdoor equipment cabinet, one (1) walk-up cabinet, and one (1) 30kw DC generator with a 190-gallon diesel fuel tank on a concrete pad. The ancillary equipment will be surrounded by an 8' chain link fence." (*See* September 25, 2025 San Francisco Planning Commission, Executive Summary, pp. 1-2).

Pursuant to City Planning Code, Section 308.1, our office asserts and raises the following grounds in support of its CUA appeal. On appeal, the Board of Supervisors is not limited to the Commission's earlier analysis or findings and may conduct its own independent review of whether the Commission's findings were proper and adequately supported.

The Appellant expressly reserves the right to supplement this letter with additional evidence and materials at or prior to hearings on the Project, and at any later hearing and proceeding related to this Project. Gov. Code, Section 65009(b); Pub. Res. Code, Section 21177(a).

Lastly, the Appellant further fully incorporates by reference all the comments and concerns raised to date on the Project or its environmental CEQA clearance, including **Appellant's own correspondence in support of its appeal of the Project's CEQA Exemption Determination, submitted to the Board on November 26, 2025**. *See Citizens for Clean Energy v. City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the project's environmental documentation may assert any issue timely raised by other parties).

## I. THE BOARD SHOULD APPROVE THE CONDITIONAL USE AUTHORIZATION APPEAL BECAUSE THE PLANNING COMMISSION'S CONDITIONAL USE AUTHORIZATION AND SHADOW FINDINGS ARE FLAWED AS A MATTER OF LAW.

The Planning Commission's findings of Conditional Use Authorization under the Planning Code section 303, include, *inter alia,* the findings that:

(c) **Determination.** After its hearing on the application, or upon the recommendation of the Director of Planning that no hearing is required, the Planning Commission shall approve the application and authorize a Conditional Use if the **facts presented** are **such** to **establish** that:

(1) The proposed use or feature, at the size and intensity contemplated and at the proposed location, will provide a development that is **necessary** or **desirable** for, and **compatible with**, the **neighborhood** or the **community**. If the proposed use exceeds the Non-Residential Use Size limitations for the district in which the use is located, the following shall be considered:

(A) The intensity of activity in the district is not such that allowing the larger use will be likely to foreclose the location of other needed neighborhood-servicing uses in the area; and

(B) The proposed use will serve the neighborhood, in whole or in significant part, and the nature of the use requires a larger size in order to function; and

(C) The building in which the use is to be located is designed in discrete elements which **respect** the **scale** of **development** in the **district**; and

(2) Such use or feature as proposed will **not** be **detrimental** to the **health**, **safety**, **convenience** or **general welfare** of **persons residing** or **working** in the **vicinity**, or **injurious** to **property**, **improvements** or **potential development** in the vicinity, with respect to **aspects** including but not limited to the following:

(A) The **nature** of the proposed site, including its **size** and **shape**, and the proposed **size**, **shape** and **arrangement** of **structures**;

(B) The accessibility and traffic patterns for persons and vehicles, the type and volume of such traffic, and the adequacy of proposed off-street parking and loading and of proposed alternatives to off-street parking, including provisions of car-share parking spaces, as defined in Section 166 of this Code.

(C) The **safeguards afforded** to prevent **noxious** or **offensive emissions** such as **noise**, **glare**, dust and **odor**;

(D) Treatment given, as appropriate, to such aspects as landscaping, screening, open spaces, parking and loading areas, service areas, lighting and signs; and

> (3) **Such use** or **feature** as proposed will comply with the **applicable provisions** of this **Code** and will not **adversely affect** the **General Plan**; **and**
>
> (4) Such use or feature as proposed will provide development that is in **conformity** with the **stated purpose** of the applicable **Use District**; **and**
>
> (5) The use or feature satisfies any **criteria specific** to the use or feature in Subsections (g), *et seq.* of this Section.

**Exhibit 1 (**Planning Code Section 303) (emphases added).

As evidenced by the Motion adopted by the Planning Commission, the text of the Planning Code 303 and the resulting analysis of the Project's consistency therewith were incomplete and non-responsive.

Most critically, in light of the seismic, fire, and chemical hazards and both noxious and also health-damaging odors presented by the Project and its operation of the 190 gallon fuel tank, as well as the Project's manifest incompatibility with express applicable General Plan policies and goals, as detailed further below, the Planning Commission's findings that the Project would not be detrimental to the public health and safety or injurious to the surrounding people and their properties, as well as the findings that the Project is consistent with the General Plan, are wholly unsupported and must be set aside. That the Project is not necessary and not desirable to the surrounding community is evidenced by the public outcry and numerous public comments in opposition of the Project, as well as the lack of interest of any nearby commercial structure or property owner to accommodate the Project.

As such, the Planning Commission's findings under Planning Code section 303 should be set aside as clearly erroneous, manifestly deficient, and factually unsupported.

For the same reasons, the Planning Commission's findings under Planning Code section 101.1(b) are unsupported, especially as to policies 6-8, which state:

> (6) That the City achieve the **greatest possible preparedness** to protect against **injury** and **loss** of **life** in an **earthquake**;
>
> (7) That **landmarks** and **historic** buildings be **preserved**; and,
>
> (8) That our **parks** and **open space** and their **access** to **sunlight** and **vistas** be protected from development.

**Exhibit 2** (Planning Code Section 101 & 101.1) (emphases added)

With the Project here, the City does not achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake, but rather makes the entire surrounding residential community exposed to heightened and more severe losses and injury to life in a potential earthquake by allowing a 104-feet tall power-charged tower, its 500 square feet base structure, and its 190 gallon fuel tank be built and placed near the fire-prone eucalyptus tree grove in a landslide zone on a site with a record history of seismic failures. The landmark of Glen Canyon Park here will not be preserved either, in the event of a wildfire which may be caused by the Project itself. And the Glen Canyon Park will not be protected from development and destruction.

Similarly, to support the Project's Shadow findings, the Planning Commission adopted findings pursuant to Planning Code section 295. And yet, such findings are also in error where, as here, there is no consistent project description: on the one hand, the Project is presented as merely a 104-feet tall *monopole,* which is to be painted brown; but on the other hand, the Project plans expressly mention a *monopine,* i.e., an artificial pine tree. To the extent the Project is indeed proposing a *monopine,* then its shadow study and related findings need to be updated and revised as the pine tree will cast more shadow on the nearby structures and uses, as compared with a bare monopole. To the extent the Project indeed proposes a *monopole,* then the Project Applicant should be required to update its Project Plans and provide accurate information. Notably, the Project Plans also leave out certain critical information as to the location of the Project, including its dimensions, blank, as shown in the screenshot below (highlights added):

NOTES:

1. DATE OF SURVEY: 12/14/2023
2. ACREAGE PARCEL: X.XX ACRES
3. ASSESSOR'S PARCEL NUMBER(S): XXX-XX-XXX
4. PROPOSED LEASE AREA: F FF' x F.FF' = FFF SQUARE FEET
5. PROPERTY OWNER(S):
6. MAGNETIC DECLINATION: XX.XX°
7. CONVERGENCE ANGLE: -X°XX'XX"

FIRM CLASSIFICATION

THE PROPERTY SHOWN HEREON FALLS WITHIN ZONE "X" AS SHOWN ON FLOOD INSURANCE RATE MAP NO. 0602980230A, EFFECTIVE DATE MARCH 23, 2021, AS PUBLISHED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY IN ACCORDANCE WITH THE NATIONAL FLOOD INSURANCE PROGRAM.

(ZONE "X" BEING CLASSIFIED AS AREAS OF MINIMAL FLOOD HAZARD PER SAID F.E.M.A. MAP ABOVE)

PROPOSED ANTENNA GEODETIC COORDINATES

THE CENTER OF THE PROPOSED ANTENNAS AS SHOWN HEREON IS LOCATED AT THE FOLLOWING COORDINATES (NAD 83):

LATITUDE: N XX°XX'XX.XX"
LONGITUDE: W XXX°XX'XX.XX"

THE LATITUDE AND LONGITUDE SHOWN HERON WERE DERIVED FROM DATA COLLECTED USING A TRIMBLE R10-2 GNSS DUAL FREQUENCY RECEIVER AND PROCESSED THROUGH THE NATIONAL GEODETIC SURVEY ONLINE POSITIONAL USER SERVICE. ACCURACY FOR KINEMATIC SURVEYING USING A TRIMBLE R10-2 GNSS RECEIVER IS HORIZONTALLY ±10MM+1 PPM RMS.

Indeed, in at least one of the maps for the Project that was reviewed by the Planning Commission in reaching its determinations incorrectly depicts the wireless tower on the wrong hill and different location than where it is actually being proposed. Specifically, the maps depicts the project on Gold Mine Hill whereas it is actually being proposed on Red Rock Hill.

The Project Plans should be updated to include all of the accurate information, before any Project may be approved or any finding may be made.

Further, because of the above-noted *omissions* and failures of the Planning Commission to address and mitigate the critical public concerns and comments on the Project, the adopted findings to support the conditional use authorization or the shadow findings cannot survive scrutiny, as a matter of law.

Lastly, the Planning Commission's findings of General Plan consistency are unsupported. In addition, the General Plan consistency findings are deficient as they

leave out the Project's inconsistencies with the open space preservation and public health and safety policies under the General Plan and its Open Space and Safety Elements. As related, because of the Project's manifest inconsistencies with the General Plan, it violates the State Planning and Zoning Law which requires both vertical consistency with the General Plan and also internal consistency between elements of the General Plan.

## II. THE PLANNING COMMISSION FAILED TO FULLY CONSIDER AND ANALYZE THE PROJECT'S INCONSISTENCIES WITH THE CITY'S GENERAL PLAN AND OWN LAND USE POLICIES.

On September 25, 2025, the Planning Commission adopted several findings of the Project's purported consistency with the General Plan. Notably, the County and the Planning Commission ignored the *relevant* and *critical* General Plan policies. But the State Planning and Zoning law or the County's Planning Code do not require consistency with only cherry-picked policies, but rather to ensure that the Project is *compatible with* the General Plan overall and does not frustrate *any* of the General Plan's policies. To ensure such compatibility, the County should look not only at the alleged *consistencies,* but first and foremost, at the *inconsistencies* of the Project with the General Plan. In the words of one California court in an analogous context:

> "The County first contends that the goals and policies stated in its General Plan should not be viewed as directives, and the General Plan therefore should be read as advisory rather than mandatory. This contention conflicts with the **recognition** that **consistency requires compatibility** with the general plan's "**objectives**, **policies**, **general land uses**, and **programs**." (internal citation and quotation omitted) The question is not whether there is a direct conflict between some mandatory provision of a general plan and some aspect of a project, but **whether** the **project** is **compatible with**, and **does not frustrate**, the **general plan's goals** and **policies**."

(*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors*, 91 Cal.App.4th 342, 378 (2001) (emphases added.)

Viewed from such correct perspective, the Project here is *incompatible with* and *frustrates* several critical policies of the General Plan and its various Elements.

**First**, in its *Introduction* to the General Plan, the City provides the following vision:

> "In this shared vision, San Francisco strives to be… a safe, livable and environmentally sustainable city, where **all are** able to live **healthy lives** and

> **access thriving natural systems**, **restorative parks**, and a **high-quality built environment**. The climate crisis requires urgent local, regional, and global action."

**Exhibit 3**, p. 2 (Introduction to General Plan) (emphases added).

The City's Introduction also acknowledges the various natural disasters to which San Francisco has been subject and prone to:

> Amid this beloved setting lies the inherent, often **hidden fragility**, including **vulnerability** to **natural disasters** and to the **mounting consequences** of anthropogenic **climate change**….

**Exhibit 3**, p. 1 (emphases added)

**Second,** it becomes more than clear that the General Plan – especially for the Project Site zoned Open Space and located near the Glen Canyon Park – imposes a critical policy of *preserving* the open space, including to ensure public health and safety.

Against this backdrop, the Planning Commission's sole reference to the City's Recreation and Open Space Element focused on only one policy and provided a stretched reasoning as to why the Project meets that single policy goal. Specifically, the Planning Commission stated:

> OBJECTIVE 1
>
> ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM
>
> Policy 1.10
>
> Ensure that open space is safe and secure for the City's entire population.
>
> *The Project will improve AT&T's coverage and capacity within George Christopher Playground and Glen Canyon Park, and in the Diamond Heights neighborhood.*

However, the Recreation and Open Space element contains numerous other policies that also merit careful consideration. Moreover, the Planning Commission's reasoning that the Project will *improve AT&T's coverage and capacity* within the playground and park and in the neighborhood does not address the *safety* and *security* for the City's surrounding population, let alone the City's entire population. As detailed above, the Project will indeed create or exacerbate significant landslide hazards, fire hazards, and contamination for the surrounding community.

In addition, unlike only *one* guiding principle, objective and policy (Objective 1, policy 10.1) referenced in the Planning Commission's adopted Motion to approve the Project and related findings of General Plan consistency, the Recreation and Open Space Element of the San Fernando General Plan contains *numerous guiding principles,* as follows:

> **1. INTEGRATED & MULTIFUNCTIONAL.** A major theme developed from the outreach process was the concept of "making the most of what we have": utilizing and improving the expansive recreation and open space system the City already provides. An integrated and multi-**functional open space network** would respond to a variety of **needs** for **recreation** and **open space**, better utilizing the existing resources. Such needs range from refreshing from daily pressures of life to exercising and active sports, from appreciating the beauty of nature to **maintaining natural habitats** and **wildlife**, and from enjoying **play time** for **kids** and adults to housing civic and cultural events.
>
> **2. SENSE OF PLACE.** San Francisco is a regional epicenter for ecological, economic, and cultural diversity. Open spaces should aim to build on our City's intrinsic qualities, both natural and cultural, and to reflect the values we place on cultural diversity and biodiversity. Furthermore, they should create a network that inspires a deep connection to place.
>
> **3. EQUITY & ACCESSIBILITY.** Open space and recreational programs should be equitably distributed. They should provide access for all residents, workers and visitors, and work towards a democratic network that includes all neighborhoods.
>
> **4. CONNECTIVITY**. San Francisco's network of **open** spaces should be **wholly connected**. The open space system should facilitate **non-motorized movement**, link **diverse neighborhoods**, be easy to navigate and understand and, where feasible, **enhance habitat** through connectivity.
>
> **5. HEALTH & SAFETY.** Open space should increase the City's capacity to be a **safe** and **healthy** place to live. Its design should **promote social interaction**, **wellness**, and a **healthy lifestyle** by providing **opportunities** for **physical**, cultural and social activities, and a **connection** to **nature**.
>
> **6. ECOLOGICAL FUNCTION & INTEGRITY.** With environmental sustainability as a driving theme, the quantity and quality of natural systems in the City should be preserved and expanded, by

> promoting aquatic and terrestrial biodiversity, by designing for watershed health, and by implementing environmental, ecological and conservation-minded strategies.
>
> **7. SUSTAINING STEWARDSHIP.** San Francisco's community members should be actively engaged as participants in its future. Policies should work towards shared, continued stewardship that increases the tangible link between community members and their open space network. Partnerships between public agencies, private business, and community based non-profits, and individual members of the community to foster pride, purpose and community should continue to be developed.

**Exhibit 4** (Recreation and Open Space Element) (emphases added).

As evident from the emphasized parts of the above-quoted passage, the Open Space Element's referenced and contemplated *health and safety* of the population is *unrelated* to the wireless access of people. It only seeks to ensure public health and safety by ensuring the *availability* of *accessible* open space for everyone. Similarly, the only connectivity referenced in the guiding principles above is not about wireless connectivity, but rather the ability of people to connect to and visit various parks and natural open space areas without cars.

Moreover, the Recreation and Open Space Element contains the following goals and policies on point that the Planning Commission has been silent about:

> "**OBJECTIVE 1**
>
> **ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM**
>
> …
>
> **POLICY 1.3**
>
> **Preserve** existing open space by **restricting** its **conversion** to **other uses** and **limiting encroachment** from **other uses**, assuring **no loss** of **quantity** or **quality** of open space.
>
> The shortage of vacant sites and the intensity of development in San Francisco produce pressures on the City's public open spaces, sometimes putting spaces at risk of conversion to uses not serving the public purpose of respite and recreation. These same factors generate considerable public demand for access to open spaces. It is **essential** that

> the **City protect** its **public open** spaces from **conversion** to other uses, which **threatens** the **overall integrity** of the **open space network**.
>
> Outdoor space in **parks** and **playgrounds** should **not** be diminished except in very unique cases. Yet, despite general agreement on the need to preserve public open space, developments may indeed be proposed on public land designated as open space. It is anticipated that the most persuasive arguments in favor of development will be based on the "**public value**" of the proposed development. The public value will differ among proposals, and a determination of this projected value as compared the potential open space benefit will be difficult and must be subject to **rigorous public scrutiny**…"

**Exhibit 4** (emphases added.)

The Project is manifestly incompatible with this objective and policy of the General Plan and Open Space Element, and frustrates them by allowing a hazardous wireless tower use within the Open Space zone and immediately next to a critical environmental resource of the Glen Canyon Park, recreational areas, residences, and other public parks. The Project is also incompatible with the above-quoted goal and policy by disregarding the public outcry here about the Project's hazards and by overestimating the "public benefit" of providing better wireless services to a community, which plainly disagrees with such a need and unambiguously refuses to accept the claimed "public benefit." As the Staff Report acknowledged, while the Project Applicant AT&T searched for other prime areas, including churches in the area with the alleged gap in coverage, other alternative sites expressed no interest in such coverage or proposal to install a wireless facility.

Moreover, contrary to AT&T's suggestions that it has a FirstNet contract with police and fire services supporting the need for wireless coverage, public communications with and inquiries confirmed that FirstNet is not the only service fire and police personnel use and the emergency services do not depend on FirstNet.

Similarly, when presenting the Project's compatibility with the Safety Element, the Planning Commission focuses only on Objective 3 of that element and disregards the rest, as shown below:

> "**COMMUNITY SAFETY ELEMENT**
>
> Objectives and Policies
>
> **OBJECTIVE 3**

ESTABLISH STRATEGIES TO ADDRESS THE IMMEDIATE EFFECTS OF A DISASTER.

**Policy 1.20**

Increase communication capabilities in preparation for all phases of a disaster and ensure communication abilities extend to hard-to-reach areas and special populations.

**Policy 2.4**

Bolster the Department of Emergency Management's role as the City provider of emergency services and communication, and prioritize its actions to meet the needs of San Francisco.

**Policy 2.15**

Utilize advancing technology to enhance communication capabilities in preparation for all phases of a disaster, particularly in the high-contact period immediately following a disaster.

**Policy 3.7**

Develop a system to convey personalized information during and immediately after a disaster.

*The Project will enhance the ability of the City to protect both life and property from the effects of a fire or natural disaster by providing communication services.*"

But the City's Safety and Resilience element is not limited to only *management* of the emergencies, but rather to also *preventing* or *reducing the risk* of such emergencies. Also, it is questionable how the Project's sole provision of allegedly now-missing wireless service by AT&T will help the public in case of a fire or natural disaster. And, critically, the Planning Commission fails to realize that the Project *itself* will cause such fire and natural disasters due to its siting in an environmentally sensitive area and by having hazardous features, as discussed above.

Critically, the City's Safety and Resilience Element contains the following six (6) goals:

"In brief, the Safety & Resilience Element is organized into six goals to achieve racial and social equity, environmental justice, and climate resilience.

**All People Live in Safe & Healthy Communities:** To ensure equitable safety, San Francisco must remedy past injustices and eliminate environmental burdens for all San Franciscans, starting with those experienced by Environmental Justice Communities.

> **Multi-Benefit Climate and Hazard Resilience:** Pursue **multi-hazard risk reduction strategies** and maximize community benefits along the way to becoming a net-zero emissions City by 2040.
>
> **Hazard Mitigation:** The City must **reduce** the **likelihood**, **scale**, and **severity** of **impacts** from **all disasters** to the economy; the built and natural environment; and all communities, starting with reducing such impacts in Environmental Justice Communities.
>
> **Emergency Preparedness:** Ensure San Francisco residents, workers, and visitors have the knowledge, capacity, and government support needed to be safe in the face of disasters.
>
> **Response:** Provide San Francisco residents, workers, and visitors with the essential support and services needed immediately following a disaster for life safety and functional recovery.
>
> **Recovery and Reconstruction:** Rebuild San Francisco's built, natural, and social assets and communities towards a more equitable and resilient future."

**Exhibit 5**, p. 1 (Safety and Resilience Element) (emphases added).

As shown in the emphasized portions, the Safety and Resilience Element seeks to *reduce the risks* of hazards, and not just manage the hazards post-facto, as the Planning Commission focused on.

To be more specific, the Safety and Resiliency Element contains a specific GOAL 3: Hazard Mitigation, which provides in pertinent parts:

> "The City must **reduce** the **likelihood**, **scale**, and **severity** of **impacts** from **all disasters** to the economy; the built and **natural environment**; and **all communities**, starting with reducing such impacts in Environmental Justice Communities."

**Exhibit 5**, p. 10 (emphases added)

The Safety and Resiliency Element also provides the following policy:

> "**POLICY 3.2.4. Ensure foundations and structural systems are designed with consideration of site soils conditions when reviewing projects in areas subject to liquefaction, slope instability, sea level rise, groundwater rise, and other flood hazards.**
>
> The Building Code considers soil conditions at a very general scale. But, soil conditions vary enormously throughout the City. Different **soil conditions** can result in very **different earthquake**

> **impacts** and can **result** in **damage** at other times, such as with **landslides**. Because of the **importance** of **soil conditions**, the California Seismic Hazards Mapping Act requires that a **geotechnical investigation** and **geotechnical report** be prepared for **new** or **renovated buildings** that are constructed in **Seismic Hazard Zones**."

**Exhibit 5**, p. 14 (emphasis added).

In addition, contrary to the noted objective and policy, the Project here – consisting of a 104-feet tall monopine or monopole and further a 500 square foot building and a 190 gallon fuel tank generator – is proposed in the landslide zone on a site with the history of seismic failures. And the City has not even disclosed, much less addressed, the soil instability and landslide hazards that the Project may cause or exacerbate, let alone present a geotechnical evaluation for public review on how those hazards are reconciled or compatible with the General Plan policies.

As the Court agreed in an analogous context, a Project's incompatibility with even *one* clear policy of the General Plan or its Elements may scuttle the project. *Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Sup'rs*, 62 Cal.App.4th 1332, 1341–1342 (1998). Here, the Project clearly frustrates several policies of the General Plan, including the policy of ensuring the health and safety of people by preserving and enhancing quality open space, as well as the policies of reducing risks of hazards and duly investigating various hazards, including soil instability, prior to approving any project.

Notably, the above-noted goals, objectives, and policies, which the Project is not compatible with, are only illustrative and not exhaustive. Both the Recreation and Open Space Element, as well as the Safety and Resilience Element contain numerous similar policies to ensure public access to safe open space, preservation of the scarce open space, protection of parks and playgrounds, and reducing risks of any hazards.

The Project clearly frustrates the noted policies, creating a vertical inconsistency and incompatibility with the General Plan, and thereby violating both the City's General Plan, as well as the State Planning and Zoning Law's requirement of vertical consistency of projects with their applicable General Plan.

As relevant, the Project's posed imminent hazards to the invaluable open space and recreation space and the fact that, as the City's General Plan noted, it is impossible to acquire new land for open space and the City of San Francisco is growing in density, the Project's potential destruction of the existing open space and frustration of

policies with the Safety and Open Space Elements will create *internal* inconstancies within the City's General Plan, including with the Land Use and Circulation Elements by allowing dense development while at the same time allowing to reduce the existing open space in quantity or quality. And yet, the State Planning and Zoning Law requires *internal consistency* within the General Plan. For this reason, too, the Project violates the State Planning and Zoning Law by creating an internal inconsistency in the City's General Plan.

As such, the Planning Commission's findings that the Project is consistent and compatible with the General Plan must be set aside as are unsupported, as a matter of law, since they are based on the glaring omissions of relevant policies and objectives and since they are based on a cursory and distorted review of the applicable General Plan policies and strained justifications thereof.

For all of the reasons above, the Planning Commission's findings and approval of the Conditional Use Authorization, Shadow Findings, and related findings of General Plan consistency under the Planning Code must be set aside as being premised on erroneous, missing, incomplete, and inaccurate information and for failing to fully consider and analyze the Project's hazards, significant threats to public life and safety, adverse impacts to the nearby open space and biological resources, and the General Plan inconsistencies, both vertically and internally.

## III. CONCLUSION

In sum, the Planning Commission's approvals for the 350 Amber Drive Project on September 25, 2025 must now be reversed by the Board because they are fundamentally and demonstrably flawed.

The Board should accept and hold a public hearing regarding Appellant's CUA appeal filing and reverse the Commission's Conditional Use Authorization and Shadow Findings. The Commission's findings were improper and based on informational flaws and the Project itself is inconsistent with the City's own General Plan and land use policies.

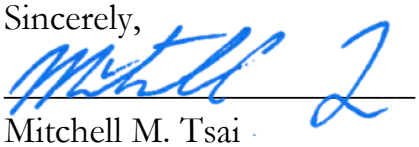
Appellant urges the Board to approve its CUA appeal in its entirety, reversing the Planning Commission's approval of the Conditional Use Authorization and Shadow Findings, and deny the Project outright. The totality of the evidence, including the Project's significant environmental impacts and substantial factual and informational

flaws, compels the denial of a project incompatible with the City's own General Plan and land use policies.

Should the Board nonetheless permit this controversial Project to move forward, it is legally obligated to approve the CEQA appeal and require the preparation of a full Environmental Impact Report (EIR) for the Project. An EIR is the highest form of environmental review and is especially necessary here to accurately assess the Project's significant impacts on the sensitive environment, evaluate feasible mitigation measures, and consider less destructive project alternatives. The Project's mass, scale, associated seismic, fire, and chemical hazards, and critical setting in one of San Francisco's naturally significant areas warrant the most rigorous public disclosure and environmental analysis to ensure the protection of the impacted community and the natural resources of Glen Canyon Park. Such reasoned and detailed review regarding the Project's impacts are also critical and required by law, in the event the case proceeds to judicial review. Lastly, Appellant respectfully requests that the Board direct City Staff and the Project applicant to address the public's concerns and comments regarding the Project.

Should the City have any questions or concerns regarding this correspondence, please do not hesitate to contact our office.

Sincerely,



Mitchell M. Tsai
Attorney for Appellant

Attachments:

**Exhibit 1:** County's Planning Code Section 303;

**Exhibit 2:** County's Planning Code section 101 and 101.1;

**Exhibit 3**: Introduction to the City's General Plan, as obtained from the City's website;

**Exhibit 4**: Recreation and Open Space Element of the City's General Plan, as obtained from the City's website;

**Exhibit 5:** Safety and Resilience Element of the City's General Plan, as obtained from the City's website;

**EXHIBIT 1**

## SEC. 303. CONDITIONAL USES.

*(See Interpretations related to this Section.)*

(a) **General.** The Planning Commission shall hear and make determinations regarding applications for the authorization of Conditional Uses in the specific situations in which such authorization is provided for elsewhere in this Code. The procedures for Conditional Uses shall be as specified in this Section 303 and in Sections 306 through 306.6, except that Planned Unit Developments shall in addition be subject to Section 304, and Hospitals and Post-Secondary Educational Institutions shall in addition be subject to the Institutional Master Plan requirements of Section 304.5.

(b) **Initiation.** A Conditional Use action may be initiated by application of the owner, or authorized agent for the owner, of the property for which the Conditional Use is sought. For a Conditional Use application to relocate a General Advertising Sign under subsection (I) below, application shall be made by a General Advertising Sign company that has filed a Relocation Agreement application and all required information with the Planning Department pursuant to Section 2.21 of the San Francisco Administrative Code.

(c) **Determination.** After its hearing on the application, or upon the recommendation of the Director of Planning that no hearing is required, the Planning Commission shall approve the application and authorize a Conditional Use if the facts presented are such to establish that:

(1) The proposed use or feature, at the size and intensity contemplated and at the proposed location, will provide a development that is necessary or desirable for, and compatible with, the neighborhood or the community. If the proposed use exceeds the Non-Residential Use Size limitations for the district in which the use is located, the following shall be considered:

(A) The intensity of activity in the district is not such that allowing the larger use will be likely to foreclose the location of other needed neighborhood-servicing uses in the area; and

(B) The proposed use will serve the neighborhood, in whole or in significant part, and the nature of the use requires a larger size in order to function; and

(C) The building in which the use is to be located is designed in discrete elements which respect the scale of development in the district; and

(2) Such use or feature as proposed will not be detrimental to the health, safety, convenience or general welfare of persons residing or working in the vicinity, or injurious to property, improvements or potential development in the vicinity, with respect to aspects including but not limited to the following:

(A) The nature of the proposed site, including its size and shape, and the proposed size, shape and arrangement of structures;

(B) The accessibility and traffic patterns for persons and vehicles, the type and volume of such traffic, and the adequacy of proposed off-street parking and loading and of proposed alternatives to off-street parking, including provisions of car-share parking spaces, as defined in Section 166 of this Code.

(C) The safeguards afforded to prevent noxious or offensive emissions such as noise, glare, dust and odor;

(D) Treatment given, as appropriate, to such aspects as landscaping, screening, open spaces, parking and loading areas, service areas, lighting and signs; and

(3) Such use or feature as proposed will comply with the applicable provisions of this Code and will not adversely affect the General Plan; and

(4) Such use or feature as proposed will provide development that is in conformity with the stated purpose of the applicable Use District; and

(5) The use or feature satisfies any criteria specific to the use or feature in Subsections (g),*et seq.* of this Section.

(d) **Conditions.** When considering an application for a Conditional Use as provided herein with respect to applications for development of "dwellings" as defined in Chapter 87 of the Administrative Code, the Commission shall comply with that Chapter which requires, among other things, that the Commission not base any decision regarding the development of “dwellings” in which “protected class” members are likely to reside on information which may be discriminatory to any member of a “protected class” (as all such terms are defined in Chapter 87 of the Administrative Code). In addition, when authorizing a Conditional Use as provided herein, the Planning Commission, or the Board of Supervisors on appeal, shall prescribe such additional conditions, beyond those specified in this Code, as are in its opinion necessary to secure the objectives of the Code. Once any portion of the Conditional Use authorization is utilized, all such conditions pertaining to such authorization shall become immediately operative. The violation of any condition so imposed shall constitute a violation of this Code and may constitute grounds for revocation of the Conditional Use authorization. Such conditions may include time limits for exercise of the Conditional Use authorization; otherwise, any exercise of such authorization must commence within a reasonable time.

(e) **Modification of Conditions.** Authorization of a change in any condition previously imposed in the authorization of a Conditional Use shall be subject to the same procedures as a new Conditional Use. Such procedures shall also apply to applications for modification or waiver of conditions set forth in prior stipulations and covenants relative thereto continued in effect by the provisions of Section 174 of this Code.

(f) **Conditional Use Abatement.** The Planning Commission may consider the possible revocation of a Conditional Use or the possible modification of or placement of additional conditions on a Conditional Use when the Planning Commission determines, based upon substantial evidence, that the applicant for the Conditional Use had submitted false or misleading information in the application process that could have reasonably had a substantial effect upon the decision of the Commission or the Conditional Use is not in compliance with a Condition of Approval, is in violation of law if the violation is within the subject matter jurisdiction of the Planning Commission, or operates in such a manner as to create hazardous, noxious, or offensive conditions enumerated in Section 202(c) if the violation is within the subject matter jurisdiction of the Planning Commission and these circumstances have not been abated through administrative action of the Director, the Zoning Administrator or other City authority. Such consideration shall be the subject of a public hearing before the Planning Commission but no fee shall be required of the applicant or the subject Conditional Use operator.

(1) **Public Hearing.** The Director of Planning or the Planning Commission may schedule a public hearing on Conditional Use abatement when the Director or Commission has obtained or received (A) substantial evidence submitted within one year of the effective date of the Conditional Use authorization that the applicant for the Conditional Use had submitted false or misleading information in the application process that could have reasonably had a substantial effect upon the decision of the Commission or (B) substantial evidence, submitted or received at any time while the Conditional Use authorization is effective, of a violation of conditions of approval, a violation of law, or operation which creates hazardous, noxious or offensive conditions enumerated in Section 202(c).

(2) **Notification.** The notice for the public hearing on a Conditional Use abatement shall be subject to the notification procedure described in Section 333 of this Code.

(3) **Consideration.** In considering a Conditional Use revocation, the Commission shall consider whether and how the false or misleading information submitted by the applicant could have reasonably had a substantial effect upon the decision of the Commission, or the Board of Supervisors on appeal, to authorize the Conditional Use, substantial evidence of how any required condition has been violated or not implemented or how the Conditional Use is in violation of the law if the violation is within the subject matter jurisdiction of the Planning Commission or operates in such a manner as to create hazardous, noxious or offensive conditions enumerated in Section 202(c) if the violation is within the subject matter jurisdiction of the Planning Commission. As an alternative to revocation, the Commission may consider how the use can be required to meet the law or the conditions of approval, how the hazardous, noxious or offensive conditions can be abated, or how the criteria of Section 303(c) can be met by modifying existing conditions or by adding new conditions which could remedy a violation.

(4) **Appeals.** A decision by the Planning Commission to revoke a Conditional Use, to modify conditions or to place additional conditions on a Conditional Use or a decision by the Planning Commission refusing to revoke or amend a Conditional Use, may be appealed to the Board of Supervisors within 30 days after the date of action by the Planning Commission pursuant to the provisions of Section 308.1(b). The Board of Supervisors may disapprove the action of the Planning Commission in an abatement matter by the same vote necessary to overturn the Commission's approval or denial of a Conditional Use. The Planning Commission's action on a Conditional Use abatement issue shall take effect when the appeal period is over or, upon appeal, when there is final action on the appeal.

(5) **Reconsideration.** The decision by the Planning Commission with respect to a Conditional Use abatement issue or by the Board of Supervisors on appeal shall be final and not subject to reconsideration within a period of one year from the effective date of final action upon the earlier abatement proceeding, unless the Director of Planning determines that:

(A) There is substantial new evidence of a new Conditional Use abatement issue that is significantly different than the issue previously considered by the Planning Commission; or

(B) There is substantial new evidence about the same Conditional Use abatement issue considered in the earlier abatement proceeding, this new evidence was not or could not be reasonably available at the time of the earlier abatement proceeding, and that new evidence indicates that the Commission's decision in the earlier proceeding has not been implemented within a reasonable time or raises significant new issues not previously considered by the Planning Commission. The decision of the Director of Planning regarding the sufficiency and adequacy of evidence to allow the reconsideration of a Conditional Use abatement issue within a period of one year from the effective date of final action on the earlier abatement proceeding shall be final.

(g) **Hotels and Motels.** With respect to applications for development of tourist hotels and motels, the Planning Commission shall consider, in addition to the criteria set forth in subsections (c) and (d) above:

(1) The impact of the employees of the hotel or motel on the demand in the City for housing, public transit, child-care, and other social services. To the extent relevant, the Commission shall also consider the seasonal and part-time nature of employment in the hotel or motel;

(2) The measures that will be taken by the project sponsor to employ residents of San Francisco in order to minimize increased demand for regional transportation; and

(3) The market demand for a hotel or motel of the type proposed.

(h) **Internet Services Exchange.**

(1) With respect to application for development of Internet Services Exchange as defined in Section 102, the Planning Commission shall, in addition to the criteria set forth in Subsection (c) above, find that:

(A) The intensity of the use at this location and in the surrounding neighborhood is not such that allowing the use will likely foreclose the location of other needed neighborhood-serving uses in the area;

(B) The building in which the use is located is designed in discrete elements, which respect the scale of development in adjacent blocks, particularly any existing residential uses;

(C) Rooftop equipment on the building in which the use is located is screened appropriately.

(D) The back-up power system for the proposed use will comply with all applicable Federal, State, regional and local air pollution controls.

(E) Fixed-source equipment noise does not exceed the decibel levels specified in the San Francisco Noise Control Ordinance.

(F) The building is designed to minimize energy consumption, such as through the use of energy-efficient technology, including without limitation, heating, ventilating and air conditioning systems, lighting controls, natural ventilation and recapturing waste heat, and as such commercially available technology evolves;

(G) The project sponsor has examined the feasibility of supplying and, to the extent feasible, will supply all or a portion of the building's power needs through on-site power generation, such as through the use of fuel cells or co-generation;

(H) The project sponsor shall have submitted design capacity and projected power use of the building as part of the conditional use application; and

(2) As a condition of approval, and so long as the use remains an Internet Services Exchange, the project sponsor shall submit to the Planning Department on an annual basis power use statements for the previous twelve-month period as provided by all suppliers of utilities and shall submit a written annual report to the Department of Environment and the Planning Department which shall state: (a) the annual energy consumption and fuel consumption of all tenants and occupants of the Internet Services Exchange; (b) the number of all diesel generators located at the site and the hours of usage, including usage for testing purposes; (c) evidence that diesel generators at the site are in compliance with all applicable local, regional, State, and Federal permits, regulations and laws; and (d) such other information as the Planning Commission may require.

(3) The Planning Department shall have the following responsibilities regarding Internet Services Exchanges:

(A) Upon the effective date of the requirement of a Conditional Use authorization for an Internet Services Exchange, the Planning Department shall notify property owners of all existing Internet Services Exchanges that the use has been reclassified as a conditional use;

(B) Upon the effective date of the requirement of a Conditional Use authorization for an Internet Services Exchange, the Planning Department shall submit to the Board of Supervisors and to the Director of the Department of Building Inspection a written report covering all existing Internet Services Exchanges and those Internet Services Exchanges seeking to obtain a Conditional Use authorization, which report shall state the address, assessor's block and lot, zoning classification, square footage of the Internet Services Exchange constructed or to be constructed, a list of permits previously issued by the Planning and/or Building Inspection Departments concerning the Internet Services Exchange, the date of issuance of such permits, and the status of any outstanding requests for permits from the Planning and/or Building Inspection Departments concerning Internet Services Exchange; and

(C) Within three years from the effective date of the requirement of a Conditional Use authorization for an Internet Services Exchange, the Planning Department, in consultation with the Department of Environment, shall submit to the Board of Supervisors a written report, which report shall contain the Planning Commission's evaluation of the effectiveness of the conditions imposed on Internet Services Exchanges, and whether it recommends additional or modified conditions to reduce energy and fuel consumption, limit air pollutant emissions, and enhance the compatibility of industrial uses, such as Internet Services Exchanges, located near or in residential or commercial districts.

(i)* **Large-Scale Retail Uses.** With respect to applications for the establishment of large-scale retail uses under Section 121.6, in addition to the criteria set forth in subsections (c) and (d) above, the Commission shall consider the following:

(1) The extent to which the retail use's parking is planned in a manner that creates or maintains active street frontage patterns;

(2) The extent to which the retail use is a component of a mixed-use project or is designed in a manner that encourages mixed-use building opportunities;

(3) The shift in traffic patterns that may result from drawing traffic to the location of the proposed use;

(4) The impact that the employees at the proposed use will have on the demand in the City for housing, public transit, childcare, and other social services; and

(5) An economic impact study. The Planning Department shall prepare an economic impact study using qualified City staff or shall select a consultant from a pool of pre-qualified consultants to prepare the economic impact study required by this subsection (i)(5). The analysis, in the form of a study, shall be considered by the Planning Commission in its review of the application. The applicant shall bear the cost of paying the consultant for the consultant's work preparing the economic impact study, and any necessary documents prepared as part of that study. The study shall evaluate the potential economic impact of the applicant's proposed project, including:

(A) **Employment Analysis.** The report shall include the following employment information: a projection of both construction-related and permanent employment generated by the proposed project, and a discussion of whether the employer of the proposed project will pay a living wage, inclusive of non-salary benefits expected to be provided, relative to San Francisco's cost of living.

(B) **Fiscal Impact.** The report shall itemize public revenue created by the proposed project and public services needed because of the proposed project, relative to net fiscal impacts to the General Fund. The impacts to the City's public facilities and infrastructure shall be estimated using the City's current assumptions in existing nexus studies (including area plan, transit, open space in-lieu fee and other impact fees), and should account for any contributions the proposed project would make through such impact fee payments.

(C) **Leakage Analysis Study.** This portion of the report shall be twofold: both quantitative and qualitative. The quantitative

portion shall provide an analysis of whether the proposed project will result in a net increase or decrease in the capture of spending by area residents on items that would otherwise be purchased outside the area. The area to be studied for potential economic impacts of the proposed project shall be determined by the City in consultation with the expert conducting the study as different sizes of study areas would be pertinent depending on a multitude of factors, including but not limited to, size and type of the proposed store. This quantitative leakage analysis should be paired with a qualitative assessment of whether the proposed use would complement existing merchandise selection in the area by adding greater variety of merchandise, bolstering the strength of an existing retail cluster, or matching evolving consumer preferences.

(j) **Change in Use or Demolition of Movie Theater Uses.** With respect to a change in use or demolition of a Movie Theater use pursuant to Section 202.4, in addition to the criteria set forth in subsections (c) and (d) above, the Commission shall make the following findings:

(1) Preservation of a Movie Theater use is no longer economically viable and cannot effect a reasonable economic return to the property owner. For purposes of defining "reasonable economic return," the Planning Commission shall be guided by the criteria for Fair Return on Investment set forth in Section 102;

(2) The change in use or demolition of the Movie Theater use will not undermine the economic diversity and vitality of the surrounding District; and

(3) The resulting project will preserve the architectural integrity of important historic features of the movie theater use affected.

(k) **Relocation of Existing General Advertising Signs pursuant to a General Advertising Sign Company Relocation Agreement.**

(1) Before the Planning Commission may consider an application for a Conditional Use to relocate an existing lawfully permitted General Advertising Sign as authorized by Section 611 of this Code, the applicant sign company must have:

(A) Obtained a current Relocation Agreement approved by the Board of Supervisors under Section 2.21 of the San Francisco Administrative Code that covers the sign or signs proposed to be relocated; and

(B) Submitted to the Department a current sign inventory, site map, and the other information required under Section 604.2 of this Code; and

(C) Obtained the written consent to the relocation of the sign from the owner of the property upon which the existing sign structure is erected.

(D) Obtained a permit to demolish the sign structure at the existing location.

(2) The Department, in its discretion, may review in a single Conditional Use application all signs proposed for relocation by a General Advertising Sign company or may require that one or more of the signs proposed for relocation be considered in a separate application or applications. Prior to the Commission's public hearing on the application, the Department shall have verified the completeness and accuracy of the General Advertising Sign company's sign inventory.

(3) Only one sign may be erected in a new location, which shall be the same square footage or less than the existing sign proposed to be relocated. In no event may the square footage of several existing signs be aggregated in order to erect a new sign with greater square footage; provided however the square footage of one or more existing signs may be disaggregated in order to erect multiple smaller signs with lesser total square footage.

(4) In addition to applicable criteria set forth in subsection (c) above, the Planning Commission shall consider the size and visibility of the signs proposed to be located as well as the following factors in determining whether to approve or disapprove a proposed relocation:

(A) The factors set forth in this subsection (A) shall weigh in favor of the Commission's approval of the proposed relocation site:

(i) The sign or signs proposed for relocation are lawfully existing but are not in conformity with the sign regulations that existed prior to the adoption of Proposition G on March 5, 2002.

(ii) The sign or signs proposed for relocation are on a City list, if any, of priorities for sign removal or signs preferred for relocation.

(iii) The sign or signs proposed for relocation are within, adjacent to, or visible from property under the jurisdiction of the San Francisco Port Commission, the San Francisco Unified School District, or the San Francisco Recreation and Park Commission.

(iv) The sign or signs proposed for relocation are within, adjacent to, or visible from an Historic District or conservation district designated in Article 10 or Article 11 of the Planning Code.

(v) The sign or signs proposed for relocation are within, adjacent to, or visible from a zoning district where general advertising signs are prohibited.

(vi) The sign or signs proposed for relocation are within, adjacent to, or visible from a designated view corridor.

(B) The factors set forth in this subsection (k)(4)(B) shall weigh against the Commission's approval of the proposed relocation:

(i) The sign or signs proposed for relocation are or will be obstructed, partially obstructed, or removed from public view by another structure or by landscaping.

(ii) The proposed relocation site is adjacent to or visible from property under the jurisdiction of the San Francisco Port Commission, the San Francisco Unified School District, or the San Francisco Recreation and Park Commission.

(iii) The proposed relocation site is adjacent to or visible from an Historic District or conservation district designated in Article 10 or Article 11 of the Planning Code.

(iv) The proposed relocation site is within, adjacent to, or visible from a zoning district where General Advertising Signs are prohibited.

(v) The proposed relocation site is within, adjacent to, or visible from a designated view corridor.

(vi) There is significant neighborhood opposition to the proposed relocation site.

(5) In no event may the Commission approve a relocation where:

(A) The sign or signs proposed for relocation have been erected, placed, replaced, reconstructed, or relocated on the property, or intensified in illumination or other aspect, or expanded in area or in any dimension in violation of Article 6 of this Code or without a permit having been duly issued; or

(B) The proposed relocation site is not a lawful location under Planning Code Section 611(c)(2); or

(C) The sign in its new location would exceed the size, height or dimensions, or increase the illumination or other intensity of the sign at its former location; or

(D) The sign in its new location would not comply with the Code requirements for that location as set forth in Article 6 of this Code; or

(E) The sign has been removed from its former location; or

(F) The owner of the property upon which the existing sign structure is erected has not consented in writing to the relocation of the sign.

(6) The Planning Commission may adopt additional criteria for relocation of General Advertising Signs that do not conflict with this Section 303(k) or Section 611 of this Code.

(l) **Change in Use or Demolition of General Grocery Uses.** With respect to a change in use or demolition of General Grocery use which use exceeds 5,000 gross square feet pursuant to Section 202.3 of this Code, in addition to the criteria set forth in subsections (c) and (d) above, the Commission shall make the following findings:

(1) Preservation of a General Grocery use is no longer economically viable and cannot effect a reasonable economic return to the property owner. The Commission may disregard the above finding if it finds that the change in use or replacement structure in the case of demolition will contain a General Grocery that is of a sufficient size to serve the shopping needs of nearby residents and offers comparable services to the former General Grocery store. For purposes of defining “reasonable economic return,” the Planning Commission shall be guided by the criteria for Fair Return on Investment set forth in Section 102; and

(2) The change in use or demolition of the General Grocery use will not undermine the economic diversity and vitality of the surrounding neighborhood.

(m) **Tobacco Paraphernalia Establishments.**

(1) With respect to a Tobacco Paraphernalia Establishment, as defined in Section 102 of this Code, in addition to the criteria set forth in Subsections (c) and (d) above, the Commission shall make the following findings:

(A) The concentration of such establishments in the particular zoning district for which they are proposed does not appear to contribute directly to peace, health, safety, and general welfare problems, including drug use, drug sales, drug trafficking, other crimes associated with drug use, loitering, and littering, as well as traffic circulation, parking, and noise problems on the district's public streets and lots;

(B) The concentration of such establishments in the particular zoning district for which they are proposed does not appear to adversely impact the health, safety, and welfare of residents of nearby areas, including fear for the safety of children, elderly and disabled residents, and visitors to San Francisco; and

(C) The proposed establishment is compatible with the existing character of the particular district for which it is proposed.

(n) **Massage Establishments.** With respect to Massage Establishments that are subject to Conditional Use authorization, in addition to the criteria set forth in subsection (c) above, the Commission shall make the following findings:

(1) Whether the use’s façade is transparent and open to the public. Permanent transparency and openness are preferable. Elements that lend openness and transparency to a façade include:

(A) active street frontage of at least 25 feet in length where 75% of that length is devoted to entrances to commercially used space or windows at the pedestrian eye-level;

(B) windows that use clear, untinted glass, except for decorative or architectural accent;

(C) any decorative railings or decorative grille work, other than wire mesh, which is placed in front of or behind such windows, should be at least 75% open to perpendicular view and no more than six feet in height above grade;

(2) Whether the use includes pedestrian-oriented lighting. Well lit establishments where lighting is installed and maintained along all public rights-of-way adjacent to the building with the massage use during the post-sunset hours of the massage use are encouraged:

(3) Whether the use is reasonably oriented to facilitate public access. Barriers that make entrance to the use more difficult than to an average service-provider in the area are to be strongly discouraged. These include (but are not limited to) foyers equipped with double doors that can be opened only from the inside and security cameras.

**Exceptions.** A Massage Establishment shall not require a Conditional Use authorization if the Massage Establishment satisfies one or more of the following conditions:

(1) The massage use is accessory to a Principal Use, if the massage use is accessed by the Principal Use and the Principal Use is a Hotel, not including a Residential Hotel; a Personal Service; a Health Service; or an Institutional Use as defined in this Code.

(2) The only massage service provided is Chair/Foot Massage, such service is visible to the public, and customers are fully clothed at all times.

(o) **Eating and Drinking Uses.** With regard to a Conditional Use authorization application for a Restaurant, Limited-Restaurant and Bar uses the Planning Commission shall consider, in addition to the criteria set forth in subsection (c) above, the existing concentration of eating and drinking uses in the area. Such concentration should not exceed 25% of the total commercial frontage as measured in linear feet within the immediate area of the subject site except as otherwise provided in this subsection (o). The concentration of eating and drinking uses in the Polk Street Neighborhood Commercial District shall not exceed 35% of the total commercial frontage as measured in linear feet within the immediate area of the subject site. For the purposes of this Section 303 of the Code, the immediate area shall be defined as all properties located within 300' of the subject property and also located within the same zoning district.

(p) **Adult Business, Adult Sex Venue, Nighttime Entertainment, and General Entertainment Uses.** With respect to Conditional Use authorization applications for Adult Business, Adult Sex Venue, Nighttime Entertainment, and General Entertainment uses, such use or feature shall meet the following conditions:

(1) All Nighttime Entertainment uses shall comply with the Entertainment Commission's Good Neighbor Policy.

(2) The Planning Commission may authorize Hours of Operation that exceed those principally permitted for the zoning district in which the use is located, provided that:

(A) facts presented are such to establish that the use will be operated in such a way as to minimize disruption to residences in and around the district with respect to noise and crowd control; and

(B) the proposed use shall not operate outside the Conditionally Permitted Hours of Operation for the zoning district.

(3) If the proposed use is located in a Cultural District established under Administrative Code Section 107, the Planning Commission shall consider the purpose and goals established in Section 107.2 as well as any recommendations set forth in the Cultural, History, Housing, and Economic Stability Strategy report for the district if one has been adopted pursuant to Section 107.4.

(4) The action of the Planning Commission approving a Conditional Use does not take effect until the appeal period is over or while the approval is under appeal.

(5) If the use is an Adult Business, it shall not be located within 1,000 feet of another such use.

(q) **Power Plants.** The controls of this Subsection shall apply to all Power Plants in M-1, M-2, and PDR-1-G, and PDR-2 Districts, including any intensification of a Power Plants as described in Section 178(c)(2).

(1) **Criteria.** In acting on any application for Conditional Use authorization for a Power Plant, the Commission shall consider the conditional use authorization requirements set forth in Subsection (c) above and, in addition, shall only approve an application for a Conditional Use authorization if facts are presented to establish that, on the basis of the record before the Commission:

(A) The benefits to the City's energy system resulting from the energy generated by the proposed power plant cannot be obtained in a reasonable time from a technically and economically feasible power plant and/or energy conservation project that would have materially fewer potential environmental impacts considering, but not limited to, the following: (i) Emissions of criteria air pollutants and greenhouse gas emissions; (ii) Stormwater and wastewater discharges; and (iii) noise and vibration impacts.

(B) A newly proposed Power Plant use would not directly and adversely impact existing or reasonably foreseeable adjoining land uses, or, as applied to a prior nonconforming use, the extension of the power plant use or the increase in intensity of the use would not result in increased direct and adverse impacts on existing or reasonably foreseeable adjoining land uses; and

(C) Granting Conditional Use authorization would not reasonably be expected to leave known contamination in place in such a way that would prolong or increase public health risks associated with such contamination at levels inconsistent with a risk-based remediation consistent with the proposed power plant use; and

(D) Granting Conditional Use authorization would not reasonably be expected to preclude future redevelopment and reuse of the property for non-power plant uses.

(2) **Written Findings.** The Planning Commission shall make detailed written findings explaining the basis for its decision under this Section.

(3) **Severability**. In the event that a court or agency of competent jurisdiction holds that Federal or State law, rule, or regulation invalidates any clause, sentence, paragraph of this Section or the application thereof to any person or circumstances, it is intended that the court or agency sever such clause, sentence, paragraph or section so that the remainder of this Section shall remain in effect.

(r) **Development of Large Lots in RTO and RTO-M Districts.** In order to promote, protect, and maintain a scale of development that is appropriate to each district and compatible with adjacent buildings, new construction or significant enlargement of existing

buildings on lots of the same size or larger than the square footage stated in Table 209.4 under Large Project Review shall be permitted only as Conditional Uses subject to the provisions set forth in this Section of this Code.

In addition to the criteria of Section 303(c)(1) of this Code, the Planning Commission shall consider the extent to which the following criteria are met:

(1) The mass and articulation of the proposed structures are compatible with the intended scale of the district.

(2) For development sites greater than ½-acre, the extension of adjacent alleys or streets onto or through the site, and/or the creation of new publicly-accessible streets or alleys through the site as appropriate, in order to break down the scale of the site, continue the surrounding existing pattern of streets and alleys, and foster beneficial pedestrian and vehicular circulation.

(3) The site plan, including the introduction of new streets and alleys, the provision of open space and landscaping, and the articulation and massing of buildings, is compatible with the goals and policies of the applicable Area Plan in the General Plan.

(s) **Wireless Telecommunications Services (WTS) Facilities.**

(1) Due to the potential modification of WTS Facilities over time and the resulting impacts on a neighborhood's aesthetics and character, as well as other changes in neighborhood character over time, a Conditional Use Authorization for a WTS Facility shall have a duration of ten years from the date of approval. If any administrative appeal is taken from the Conditional Use Authorization, the ten-year period shall run from the date the Authorization is upheld on administrative appeal.

(2) The Authorization may be renewed, without limitation, for subsequent time periods of ten years, subject to the following:

(A) The renewal application is filed with the Planning Department prior to expiration, but no earlier than 24 months prior to expiration.

(B) For any Conditional Use Authorization for a WTS Facility, the Planning Commission may, in granting the Conditional Use Authorization, determine that the Director shall review and determine whether to grant any application for renewal of the Conditional Use Authorization for an additional ten-year period.

(C) This provision shall not apply to Conditional Use Authorizations granted prior to the effective date of this Subsection (s). However, applications for Conditional Use Authorizations to modify existing WTS Facilities that are granted on or after the effective date of this Subsection (s) are subject to this Subsection (s).

(t) **Non-accessory Parking.** When considering a Conditional Use application for non-accessory parking for a specific use or uses, the Planning Commission shall find affirmatively that the project satisfies the following criteria, in addition to those of subsection 303(c), as applicable.

(1) In all zoning districts, the Planning Commission shall apply the following criteria:

(A) Demonstration that trips to the use or uses to be served, and the apparent demand for additional parking, cannot be satisfied by the amount of parking classified by this Code as accessory, by transit service which exists or is likely to be provided in the foreseeable future, by car pool arrangements, by more efficient use of existing on-street and off-street parking available in the area, and by other means;

(B) Demonstration that the apparent demand for additional parking cannot be satisfied by the provision by the applicant of one or more car-share parking spaces in addition to those that may already be required by Section 166 of this Code;

(C) The absence of potential detrimental effects of the proposed parking upon the surrounding area, especially through unnecessary demolition of sound structures, contribution to traffic congestion, or disruption of or conflict with transit services, walking, and cycling;

(D) In the case of uses other than housing, limitation of the proposed parking to short-term occupancy by visitors rather than long-term occupancy by employees; and

(E) Availability of the proposed parking to the general public at times when such parking is not needed to serve the use or uses for which it is primarily intended.

(2) **For Non-Accessory Parking in Mixed Use Districts:**

(A) A non-accessory garage permitted with Conditional Use may not be permitted under any condition to provide additional accessory parking for specific residential or non-residential uses if the number of spaces in the garage, in addition to the accessory parking permitted in the subject project or building, would exceed those amounts permitted as-of-right or as a Conditional Use by Section 151.1.

(B) **Criteria.**

(i) Such facility shall meet all the design requirements for setbacks from facades and wrapping with active uses at all levels per the requirements of Section 145.1; and

(ii) Such parking shall not be accessed from any protected Transit or Pedestrian Street described in Section 155(r); and

(iii) Such parking garage shall be located in a building where the ratio of gross square footage of parking uses to other uses that are permitted or Conditionally permitted in that district is not more than 1 to 1; and

(iv) Such parking shall be available for use by the general public on equal terms and shall not be deeded or made available

exclusively to tenants, residents, owners, or users of any particular use or building except in cases that such parking meets the criteria of subsection (C) or (D) below; and

(v) Such facility shall provide spaces for car sharing vehicles per the requirements of Section 166 and bicycle parking per the requirements of Sections 155.1 and 155.2; and

(vi) Such facility, to the extent open to the public per subsection (iv) above, shall meet the pricing requirements of Section 155(g) and shall generally limit the proposed parking to short-term occupancy rather than long-term occupancy; and

(vii) Vehicle movement on or around the facility does not unduly impact pedestrian spaces or movement, transit service, bicycle movement, or the overall traffic movement in the district; and

(viii) Such facility and its access does not diminish the quality and viability of existing or planned streetscape enhancements.

(C) **Parking of Fleet Vehicles.** Parking of fleet of commercial or governmental vehicles intended for work-related use by employees and not used for parking of employees' personal vehicles may be permitted with Conditional Use provided that the Commission affirmatively finds all of the above criteria except criteria (iv) and (vi).

(D) **Pooled Residential Parking.** Non-accessory parking facilities limited to use by residents, tenants, or visitors of specific off-site development(s) may be permitted with Conditional Use, provided that the Commission affirmatively finds all of the above criteria under (B) except criteria (iv) and (vi), and provided further that the proposed parking on the subject lot would not exceed the maximum amounts permitted by Section 151.1 with Conditional Use or Exceptions under Sections 309.1 and 329 as accessory for the uses in the off-site residential development. For the purpose of this subsection, an "off-site development" is a development which is existing or has been approved by the Planning Commission or Planning Department in the previous 12 months, is located on a lot other than the subject lot, and does not include any off-street parking. A Notice of Special Restrictions shall be recorded on both the off-site and subject development lot indicating the allocation of the pooled parking.

(3) **For Non-Accessory Parking in C-3, RC, NCT, and RTO Districts:**

(A) The rate structure of Section 155(g) shall apply;

(B) The project sponsor has produced a survey of the supply and utilization of all existing publicly-accessible parking facilities, both publicly and privately owned, within one-half mile of the subject site, and has demonstrated that such facilities do not contain excess capacity, including via more efficient space management or extended operations;

(C) In the case of expansion of existing facilities, the facility to be expanded has already maximized capacity through use of all feasible space efficient techniques, including valet operation or mechanical stackers;

(D) The proposed facility meets or exceeds all relevant urban design requirements and policies of this Code and the General Plan regarding wrapping with active uses and architectural screening, and such parking is not accessed from any frontages protected in Section 155(r);

(E) Non-accessory parking facilities shall be permitted in new construction only if the ratio between the amount of Occupied Floor Area of principally or conditionally-permitted non- parking uses to the amount of Occupied Floor Area of parking is at least two to one;

(F) The proposed facility shall dedicate no less than 5% of its spaces for short-term, transient use by car share vehicles as defined in Section 166, vanpool, rideshare, or other co-operative auto programs, and shall locate these vehicles in a convenient and priority location. These spaces shall not be used for long-term storage or to satisfy the requirement of Section 166, but rather are intended for use by short-term visitors and customers. Parking facilities intended for sole and dedicated use as long-term storage for company or government fleet vehicles, and not to be available to the public nor to any employees for commute purposes, are not subject to this requirement;

(G) For new or expanding publicly owned non-accessory parking facilities in the C-3, RC, NCT, and RTO Districts, the following shall also apply:

(i) Expansion or implementation of techniques to increase utilization of existing public parking facilities in the vicinity has been explored in preference to creation of new facilities, and has been demonstrated to be infeasible;

(ii) The City has demonstrated that all major institutions (cultural, educational, government) and employers in the area intended to be served by the proposed facility have Transportation Demand Management programs in place to encourage and facilitate use of public transit, carpooling, car sharing, bicycling, walking, and taxis;

(iii) The City has demonstrated that conflicts with pedestrian, cycling, and transit movement resulting from the placement of driveways and ramps, the breaking of continuity of shopping facilities along sidewalks, and the drawing of traffic through areas of heavy pedestrian concentration, have been minimized, and such impacts have been mitigated to the fullest extent possible; and

(iv) The proposed parking conforms to the objectives and policies of the General Plan and any applicable area plans, and is consistent with the City's transportation management, sustainability, and climate protection goals.

(u) **Accessory Parking Above That Principally Permitted.**

(1) **Residential Uses.**

(A) In granting approval for parking accessory to Residential Uses above that principally permitted in Table 151.1, the Planning Commission shall make the following affirmative findings in addition to those stated in Section 303(c):

(i) For projects with 50 units or more, all residential accessory parking in excess of 0.5 parking spaces for each Dwelling Unit shall be stored and accessed by mechanical stackers or lifts, valet, or other space-efficient means that allow more space above-ground for housing, maximizes space efficiency, and discourages use of vehicles for commuting or daily errands. The Planning Commission may authorize the request for additional parking notwithstanding that the project sponsor cannot fully satisfy this requirement provided that the project sponsor demonstrates hardship or practical infeasibility (such as for retrofit of existing buildings) in the use of space-efficient parking given the configuration of the parking floors within the building and the number of independently accessible spaces above 0.5 spaces per unit is de minimus and subsequent valet operation or other form of parking space management could not significantly increase the capacity of the parking space above the maximums in Table 151.1;

(ii) All parking meets the active use and architectural screening requirements in Section 145.1 and the project sponsor is not requesting any exceptions or variances requiring such treatments elsewhere in this Code;

(iii) Demonstration that trips to the use or uses to be served, and the apparent demand for additional parking, cannot be satisfied by the amount of parking classified by this Code as accessory, by transit service which exists or is likely to be provided in the foreseeable future, by carpool arrangements, by more efficient use of existing on-street and off-street parking available in the area, and by other means;

(iv) Demonstration that the apparent demand for additional parking cannot be satisfied by the provision by the applicant of one or more car-share parking spaces in addition to those that may already be required by Section 166 of this Code;

(v) The absence of potential detrimental effects of the proposed parking upon the surrounding area, especially through unnecessary demolition of sound structures, contribution to traffic congestion, or disruption of or conflict with transit services, walking, and cycling; and

(vi) Accommodating excess accessory parking does not degrade the overall urban design quality of the project proposal nor diminish the quality and viability of existing or planned streetscape enhancements.

(B) **Required Additional Conditions.** Additionally, in granting approval for such accessory parking above that principally permitted, the Commission may require the property owner to pay the annual membership fee to a certified car-share organization, as defined in Section 166(b)(2), for any resident of the project who so requests and who otherwise qualifies for such membership, provided that such requirement shall be limited to one membership per Dwelling Unit, when the following findings are made:

(i) that the project encourages additional private-automobile use, thereby creating localized transportation impacts for the neighborhood; and

(ii) that these localized transportation impacts may be lessened for the neighborhood by the provision of car-share memberships to residents.

(2) **Non-Residential Uses.**

(A) **Criteria.** In granting such Conditional Use, the Planning Commission shall make the following affirmative findings according to the uses to which the proposed parking is accessory:

(i) Vehicle movement on or around the project does not unduly impact pedestrian spaces or movement, transit service, bicycle movement, or the overall traffic movement in the district;

(ii) Accommodating excess accessory parking does not degrade the overall urban design quality of the project proposal;

(iii) All above-grade parking is architecturally screened and lined with active uses according to the standards of Section 145.1, and the project sponsor is not requesting any exceptions or variances requiring such treatments elsewhere in this Code; and

(iv) Excess accessory parking does not diminish the quality and viability of existing or planned streetscape enhancements.

(B) **Conditions.** All Non-Residential Uses exceeding 20,000 square feet shall be subject to the following conditions:

(i) Projects that provide more than 10 spaces for non-residential uses must dedicate 5% of these spaces, rounded down to the nearest whole number, to short-term, transient use by vehicles from certified car sharing organizations per Section 166, vanpool, rideshare, taxis, or other co-operative auto programs. These spaces shall not be used for long-term storage nor satisfy the requirement of Section 166, but rather to park the vehicles during trips to commercial uses. These spaces may be used by shuttle or delivery vehicles used to satisfy Subsection (ii);

(ii) Retail uses larger than 20,000 square feet including but not limited to grocery, hardware, furniture, consumer electronics, greenhouse or nursery, and appliance stores, which sell merchandise that is impractical to carry on public transit, shall offer, at minimal or no charge to its customers, door-to-door delivery service and/or shuttle service. This is encouraged, but not required, for retail uses less than 20,000 square feet;

(iii) Parking shall be limited to short-term use only; and

(iv) Parking shall be available to the general public at times when such parking is not needed to serve the use or uses to which it is accessory.

(v) **Affordable Housing Bonus Projects.** The purpose of this Section 303(v) is to ensure that all Analyzed State Density Bonus Program Projects under Section 206.5 are reviewed in coordination with priority processing available for certain projects with greater levels of affordable housing. While most projects in the Program will likely be somewhat larger than their surroundings in order to facilitate higher levels of affordable housing, the Planning Commission and Department shall ensure that each project is consistent with the Affordable Housing Bonus Design Guidelines and any other applicable design guidelines, as adopted and periodically amended by

the Planning Commission, so that projects respond to their surrounding context, while still meeting the City's affordable housing goals.

(1) **Planning Commission Design Review:** The Planning Commission shall review and evaluate all physical aspects of a State Analyzed Project at a public hearing. The Planning Commission recognizes that most qualifying projects will need to be larger in height and mass than surrounding buildings to achieve the Affordable Housing Bonus Program's affordable housing goals. However, the Planning Commission may, consistent with the Affordable Housing Bonus Program Design Guidelines, and any other applicable design guidelines, and upon recommendation from the Planning Director, make minor modifications to a project to reduce the impacts of such differences in scale.

(2) **Additional Criteria.** In addition to the criteria set forth in subsection (c)(2), the Planning Commission shall consider the extent to which the following criteria are met:

(A) whether the project would require the demolition of an existing building;

(B) whether the project would remove existing commercial or retail uses;

(C) If the project would remove existing commercial or retail uses, how recently the commercial or retail uses were occupied by a tenant or tenants;

(D) whether the project includes commercial or retail uses;

(E) whether there is an adverse impact on the public health, safety, and general welfare due to the loss of commercial or retail uses in the district where the project is located; and

(F) whether any existing commercial or retail use has been designated, or is eligible to be designated, as a Legacy Business under Administrative Code Section 2A.242; or is a formula retail business.

(3) In no case may a project receive a site permit or any demolition permit prior to 18 months from the date of written notification required by 206.5(d)(7).

(w) **Cannabis Retail.** With respect to any application for the establishment of a new Cannabis Retail Use, in addition to the criteria set forth in subsections (c) and (d) above, the Commission shall consider the geographic distribution of Cannabis Retail Uses throughout the City, the concentration of Cannabis Retail and Medical Cannabis Dispensary Uses within the general proximity of the proposed Cannabis Retail Use, the balance of other goods and services available within the general proximity of the proposed Cannabis Retail Use, any increase in youth access and exposure to cannabis at nearby facilities that primarily serve youth, and any proposed measures to counterbalance any such increase.

(x) **Medical Cannabis Dispensaries.** With respect to any application for the establishment of a new Medical Cannabis Dispensary Use, in addition to the criteria set forth in subsections (c) and (d) above, the Commission shall consider the concentration of Cannabis Retail and Medical Cannabis Dispensary Uses within the general proximity the proposed Medical Cannabis Dispensary Use.

(y) **Curb Cuts on Restricted Streets.** With respect to an application for a new or expanded curb cut on street frontages subject to Section 155(r), the Planning Commission shall affirmatively find, in addition to those findings in subsections 303(c) and (d) above, that the project meets one or more of the following criteria:

(1) That the restriction on curb cuts at this location would substantially affect access to or operations of emergency services;

(2) That the proposed land use(s) requires off-street parking or loading for disability access under a local, State, or federal law or has an extraordinary need to provide off-street parking or loading for a General Grocery Use, Institutional Use, or PDR Use; and/or

(3) The proposed use necessitates on-site loading spaces in order to prevent a significant negative impact on Muni operations, the safety of pedestrian, cyclists, or traffic hazards.

(z) **Liquor Stores.** With regard to the Conditional Use application for a Liquor Store use, the Planning Commission shall consider, in addition to the criteria set forth in subsection (c) above:

(1) the existing concentration of Liquor Store uses within 300 feet of the proposed location; and

(2) the availability of General Grocery or Specialty Grocery stores in the area selling alcoholic beverages as well as a range of foods.

(aa) **Change in Use or Demolition of Residential Care Facility.** With respect to a change of use from or demolition of a Residential Care Facility, as defined in Sections 102 and 890.50(e) of the Planning Code, including a Residential Care Facility established with or without the benefit of any permits required under the Municipal Code, in addition to the criteria set forth in subsections (c) and (d) of this Section 303, the Commission shall take into account the following factors when considering a Conditional Use Authorization for the change of use or demolition of a Residential Care Facility:

(1) Information provided by the Department of Public Health, the Human Services Agency, the Department of Disability and Aging Services, the Golden Gate Regional Center, and/or the San Francisco Long-Term Care Coordinating Council with regard to the population served, nature and quality of services provided, and capacity of the existing Residential Care Facility;

(2) Data on available beds at licensed Residential Care Facilities within a one-mile radius of the site, and assessment from any of the above agencies regarding whether these available beds are sufficient to serve the need for residential care beds in the neighborhoods served by the Residential Care Facility proposed for a change of use or demolition, and in San Francisco;

(3) Whether the Residential Care Facility proposed for a change of use or demolition will be relocated or its capacity will be

replaced at another Residential Care Facility Use, and whether such relocation or replacement is practically feasible; and

(4) Whether the continued operation of the existing Residential Care Facility by the current operator is practically feasible and whether any other licensed operator or any of the above agencies has been contacted by the applicant seeking the change of use or demolition, or has expressed interest in continuing to operate the facility.

(bb) **Social Service and Philanthropic Facilities in Chinatown Visitor Retail, Chinatown Residential Neighborhood Commercial, and Chinatown Community Business Districts.** With regard to a Conditional Use application for a Social Service or Philanthropic Facility use pursuant to Section 121.4 of this Code, in addition to consideration of the criteria set forth in subsection (c) above, the Planning Commission shall, in order to grant a Conditional Use Authorization, find that the proposed use will primarily serve the Chinatown neighborhood.

(cc) **Parcel Delivery Services.**

(1) **Criteria.** With respect to a Conditional Use application for Parcel Delivery Service use as defined in Section 102 of the Planning Code that is less than 5,000 square feet in size, the Planning Commission shall consider the criteria in subsections (c) and (d) above. With respect to a Conditional Use application for Parcel Delivery Service use that is 5,000 square feet or larger, in addition to the criteria in subsections (c) and (d) above, the Planning Commission shall consider the following:

(A) The extent to which the use will adversely impact traffic patterns and queuing times and add total vehicle miles traveled, including by delivery drivers and couriers operating to and from the site;

(B) The greenhouse gas emissions resulting from operating of the site, including from indirect sources such as courier and delivery vehicles;

(C) The impact that the use will have on public transit, public safety, and emergency response, with particular attention paid to the rate of workplace injury associated with the use and moving violations and traffic accidents requiring public safety or emergency service response; and

(D) The impact on educational institutions located near the site; and

(E) An economic impact study. The Planning Department shall prepare an economic impact study using City staff or shall, consistent with the Charter, select a consultant from a pool of pre-qualified consultants to prepare the economic impact study required by this subsection (cc). The economic impact study shall be considered by the Planning Commission in its review of the application. In the event a consultant is used, the applicant shall bear the cost of paying the consultant for their work preparing the economic impact study, and any necessary documents prepared as part of that study. The study shall evaluate the potential economic impact of the applicant's proposed project, including:

(i) **Employment Analysis.** The report shall include the following employment information: a projection of both construction-related and permanent employment generated by the proposed project, and a discussion of whether the employer of the proposed project will pay a living wage, inclusive of non-salary benefits expected to be provided, relative to San Francisco's cost of living. The employment analysis shall also include a discussion of the past and current employment practices of the proposed operator, if any, including but not limited to artificial intelligence utilization and autonomous vehicles driven in ratio of human-operated activities.

(ii) **Fiscal Impact.** The report shall itemize public revenue created by the proposed project and public services needed because of the proposed project, relative to net fiscal impacts to the General Fund. The impacts to the City's public facilities and infrastructure shall be estimated using the City's current assumptions in existing nexus studies (including area plan, transit, open space in-lieu fee and other impact fees), and should account for any contributions the proposed project would make through such impact fee payments.

(2) **Required Additional Conditions.** All Parcel Delivery Service facilities shall be subject to at least the following conditions of project approval:

(A) **Electrification.** Facilities shall include necessary infrastructure and electrical capacity to accommodate and charge electric vehicles—including electric heavy-duty delivery trucks, employee vehicles, and all other zero-emission vehicles accessing the facility; power refrigeration for refrigerated spaces; and serve any other processes that would otherwise rely upon fossil fuel combustion. Facilities shall install battery storage to address power disruption. Diesel back-up generators shall only be permitted if the facility demonstrates battery storage is infeasible and shall meet CARB's Tier 4 emission standards or meet the most stringent in-use standard, whichever has the least emissions.

(B) **Idling of Vehicles.** To reduce idling emissions from transport trucks, the facility shall have signage placed at truck access points, loading docks, and truck parking areas that clearly notes idling for more than three minutes is strictly prohibited on the subject property. The facility shall fund placement of similar signs installed by the City in the adjacent streets used for access. Each sign placed outside the property should note the California Air Resources Board idling prohibitions on the adjacent streets and include telephone numbers of the building facilities manager and the California Air Resources Board to report violations. All signage should be made of weather-proof materials. All site and architectural plans submitted to the City shall note the locations of these signs.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 69-87, App. 3/13/87; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90; Ord. 47-92, App. 2/14/92; Ord. 304-99, File No. 990495, App. 12/3/99; Ord. 311-99, File No. 991585, App. 12/3/99; Ord. 169-00, File No. 991953, App. 7/7/2000; Ord. 259-00, File No. 001422, App. 11/17/2000; Ord. 77-02, File No. 011448, App. 5/24/2002; Ord. 43-03, File No. 021772, App. 4/3/2003; Ord. 62-04, File No. 031501, App. 4/9/2004; Ord. 89-04, File No. 031463, App. 5/27/2004; Ord. 270-04, File No. 041070, App. 11/9/2004; Ord. 140-06, File No. 052921, App. 6/22/2006; Ord. 298-06, File No. 061261, App. 12/12/2006; Ord. 72-08, File No. 071157, App. 4/3/2008; Ord. 112-08, File No. 080095, App. 6/30/2008; Ord. 244-08, File No. 080567, App. 10/30/2008; Ord. 245-08, File No. 080696; Ord. 139-09, File No. 090402, App. 7/2/2009; Ord. 140-11, File No. 110482, App. 7/5/2011, Eff. 8/4/2011; Ord. 75-12 , File No. 120084, App. 4/23/2012, Eff. 5/23/2012; Ord. 106-12 , File No. 120047, App. 6/22/2012, Eff. 7/22/2012; Ord. 182-12 , File No. 120665, App. 8/8/2012, Eff. 9/7/2012; Ord. 56-13 , File No. 130062, App. 3/28/2013, Eff. 4/27/2013; Ord. 248-13 , File No. 130372, App. 11/8/2013, Eff. 12/8/2013; Ord. 235-14 , File No. 140844, App. 11/26/2014, Eff. 12/26/2014; Ord. 235-14 , File No. 140844, App. 11/26/2014, Eff. 12/26/2014; Ord. 22-15, File No. 141253, App. 2/20/2015, Eff. 3/22/2015; Ord. 188-15 , File No. 150871, App. 11/4/2015, Eff. 12/4/2015; Ord. 166-16 , File No. 160477, App. 8/11/2016, Eff. 9/10/2016; Ord. 99-17, File No. 170206, App. 5/19/2017, Eff. 6/18/2017; Ord. 116-17, File No. 150969, App. 6/13/2017, Eff. 7/13/2017; Ord. 129-17, File No. 170203, App. 6/30/2017, Eff. 7/30/2017; Ord. 205-17, File No. 170418, App. 11/3/2017, Eff. 12/3/2017; Ord. 229-17, File No. 171041, App. 12/6/2017, Eff. 1/5/2018; Ord. 198-18, File

No. 180456, App. 8/10/2018, Eff. 9/10/2018; Ord. 277-18, File No. 180914, App. 11/20/2018, Eff. 12/21/2018; Ord. 179-18, File No. 180423, App. 7/27/2018, Eff. 8/27/2018, Oper. 1/1/2019; Ord. 182-19, File No. 190248, App. 8/9/2019, Eff. 9/9/2019; Ord. 63-20, File No. 200077, App. 4/24/2020, Eff. 5/25/2020; Ord. 149-21, File No. 210535, App. 9/29/2021, Eff. 10/30/2021; Ord. 197-21, File No. 210600, App. 11/5/2021, Eff. 12/6/2021; Ord. 233-21, File No. 210381, App. 12/22/2021, Eff. 1/22/2022; Ord. 37-22, File No. 211263, App. 3/14/2022, Eff. 4/14/2022; Ord. 75-22, File No. 220264, App. 5/13/2022, Eff. 6/13/2022; Ord. 70-23, File No. 220340, App. 5/3/2023, Eff. 6/3/2023; Ord. 47-24, File No. 231223, App. 3/15/2024, Eff. 4/15/2024; Ord. 54-24, File No. 240169, App. 3/22/2024, Eff. 4/22/2024, Retro. 3/30/2024; Ord. 113-24, File No. 240193, App. 6/13/2024, Eff. 7/14/2024, Retro. 3/30/2024; Ord. 297-24, File No. 241055, App. 12/19/2024, Eff. 1/19/2025; Ord. 37-25, File No. 240787, App. 4/3/2025, Eff. 5/4/2025)

**AMENDMENT HISTORY**

[Former] division (i) and division (l)(5)(A) amended; Ord. 140-11, Eff. 8/4/2011. [Former] division (i) amended; [former] division (p) added; Ord. 75-12 , Eff. 5/23/2012. [Former] division (i) amended; Ord. 106-12 , Eff. 7/22/2012. [Former] division (g)(1)(D) added; [former] divisions (g)(2) and (g)(3) amended; Ord. 182-12 , Eff. 9/7/2012. Divisions (c)(3), (c)(4), (c)(5)(A), (c)(5)(A)(i), and [former] (i) amended; former divisions (j)(A)-(D) redesignated as [former] (j)(1)-(4); [former] divisions (k)(1), (l)(3), (l)(5), (n)(1), and (o)(1) amended; Ord. 56-13 , Eff. 4/27/2013. [Former] division (i) amended; Ord. 248-13 , Eff. 12/8/2013. Former division (i) deleted; former division (j) redesignated as current division (i) and new division (i)(5) added; former divisions (k)-(o) redesignated as current divisions (j)-(n) and internal references adjusted accordingly; former divisions (p) and (p)(1)(A) redesignated as current divisions (o) and [former] (o)(1); Ord. 235-14 , Eff. 12/26/2014. Former division (c)(1)(A) merged into division (c)(1) and amended; former divisions (c)(1)(A)(i)-(iii) redesignated as (c)(1)(A)-(C); divisions (c)(4) and (c)(5) amended; former division (c)(6) deleted; divisions (f)(1)-(3) amended; former division (g)(1) merged into division (g) and former divisions (g)(1)(A)-(D) redesignated as (g)(1)-(4); former divisions (g)(2) and (g)(3) deleted; divisions (h)(1), (h)(3)(A)-(C), (j), and (j)(1) amended; former division (j)(1)(A)(i) merged into division (j)(1)(A) and amended; divisions (j)(1)(B), (l), and (l)(1) amended; former division (l)(1)(A)(i) merged into division (l)(1)(A) and amended; divisions (m)(1), (n)(1), and (n)(1)(A) amended; former division (o)(1) merged into division (o) and amended; divisions (p) and (q) added; Ord. 22-15, Eff. 3/22/2015. Divisions (n)(1)(A), (p), (p)(1), and (p)(2) amended; division (r) added; Ord. 188-15 , Eff. 12/4/2015. Division (s) added; Ord. 166-16 , Eff. 9/10/2016. Divisions (t) and (u) added; Ord. 99-17 , Eff. 6/18/2017. [Former] division (t) added; Ord. 116-17 , Eff. 7/13/2017. Divisions (a), (b), (c), (d), (e), (f)-(f)(5)(B), amended; former division (j)(1) merged into division (j) and amended; former divisions (j)(1)(A)-(C) redesignated as (j)(1)-(3); divisions (k)(1), (k)(2), (k)(4)(B), (k)(4)(B)(iv), and (k)(6) amended; former division (l)(1) merged into division (l), former divisions (l)(1)(A)-(B) redesignated as (l)(1)-(2), and current divisions (l)-(l)(2) amended; former division (n)(1) merged into division (n), former divisions (n)(1)(A)-(D) redesignated as (n)(1)-(4), and former divisions (n)(1)(B)(i)-(iii) redesignated as (n)(2)(A)-(C); current divisions (n), (n)(1), (n)(2)(A), and (n)(2)(C) amended; divisions (p), (p)(1), (p)(2), (p)(3), and (r) amended; Ord. 129-17 , Eff. 7/30/2017. Divisions (a), (f), and (o) amended; Ord. 205-17 , Eff. 12/3/2017. Second division (t) redesignated as (v) and related references amended; divisions (w) and (x) added; Ord. 229-17, Eff. 1/5/2018. Divisions (v) and (v)(1) amended; former divisions (v)(1)(A)- (v)(2)(G) deleted; former divisions (v)(3)-(v)(3)(F) and (v)(4) redesignated as (v)(2)-(v)(2)(F) and (v)(3); current division (v)(3) amended; Ord. 198-18, Eff. 9/10/2018. Divisions (y)-(y)(3) added; Ord. 277-18, Eff. 12/21/2018. Division (f)(2) amended; Ord. 179-18, Oper. 1/1/2019. Divisions (z)-(z)(B)[1] added; Ord. 182-19 , Eff. 9/9/2019. Exceptions (1)-(3) appended to division (n); divisions (z)(A) and (z)(B) redesignated as (z)(1) and (z)(2); Ord. 63-20, Eff. 5/25/2020. Division (aa) added; Ord. 149-21, Eff. 10/30/2021. Division (bb) added; Eff. 12/6/2021. Division (n)(1) deleted; divisions (n)(2)-(4) redesignated as (n)(1)-(3); division (n) Exceptions (1)(A) and (3) deleted; division (n) Exception (1)(B) merged into Exception (1); current division (n) Exceptions (1) and (2) amended; Ord. 233-21, Eff. 1/22/2022. Division (n) amendments reapplied; Exception (1) further amended; Ord. 37-22, Eff. 4/14/2022. Divisions (p), (p)(1), (p)(1)(D), (p)(2) amended; new division (p)(3) added; former division (p)(3) redesignated as (p)(4); Ord. 75-22, Eff. 6/13/2022. Divisions (p)(1)(A)-(D) deleted; divisions (p)-(p)(1) amended as (p); division (p)(2) amended as (p)(2)-(p)(2)(A); divisions (p)(1), (p)(2)(B), and (p)(5) added; Ord. 70-23, Eff. 6/3/2023. Divisions (cc)- (cc)(2)(B) added; Ord. 47-24, Eff. 4/15/2024; and Ord. 54-24, Retro. 3/30/2024. Division (cc)(1)(D) redesignated as (cc)(1)(E); new division (cc)(1)(D) added; division (cc)(1)(E)(i) amended; Ord. 113-24, Eff. 7/14/2024, Retro. 3/30/2024. Divisions (i) and (i)(5) amended; Ord. 297-24, Eff. 1/19/2025. Divisions (a), (g), (g)(2)-(3) amended; division (g)(4) deleted; Ord. 37-25, Eff. 5/4/2025.

*** Editor's Note:**

Prior to the effectiveness of Ord. *235-14* , this Sec. 303(i) pertained to formula retail uses. That ordinance deleted those provisions from this section and enacted new Sec. 303.1 ("Formula Retail Uses").

**EXHIBIT 2**

## SEC. 101. PURPOSES.

This Planning Code is adopted to promote and protect the public health, safety, peace, morals, comfort, convenience and general welfare, and for the following more particularly specified purposes:

(a) To guide, control and regulate future growth and development in accordance with the General Plan of the City and County of San Francisco;

(b) To protect the character and stability of residential, commercial and industrial areas within the City, and to promote the orderly and beneficial development of such areas;

(c) To provide adequate light, air, privacy and convenience of access to property, and to secure safety from fire and other dangers;

(d) To prevent overcrowding the land and undue congestion of population;

(e) To regulate the location of buildings and the use of buildings and land adjacent to streets and thoroughfares, in such manner as to obviate the danger to public safety caused by undue interference with existing or prospective traffic movements on such streets and thoroughfares.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 188-15 , File No. 150871, App. 11/4/2015, Eff. 12/4/2015 )

AMENDMENT HISTORY

- Introductory paragraph and division (a) amended; Ord. 188-15 , Eff. 12/4/2015.

## SEC. 101.1. GENERAL PLAN CONSISTENCY AND IMPLEMENTATION.

*(See Interpretations related to this Section.)*

(a) The General Plan shall be an integrated, internally consistent and compatible statement of policies for San Francisco. To fulfill this requirement, after extensive public participation and hearings, the Planning Commission shall in one action amend the General Plan by January 1, 1988.

(b) The following Priority Policies are hereby established. They shall be included in the preamble to the General Plan and shall be the basis upon which inconsistencies in the General Plan are resolved:

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

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

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

(4) That commuter traffic not impede Muni transit service or overburden our streets or neighborhood parking;

(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;

(6) That the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake;

(7) That landmarks and historic buildings be preserved; and,

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

(c) The City may not adopt any zoning ordinance or development agreement authorized pursuant to Government Code Section 65865 after November 4, 1986, unless prior to that adoption it has specifically found that the ordinance or development agreement is consistent with the Priority Policies established above.

(d) The City may not adopt any zoning ordinance or development agreement authorized pursuant to Government Code Section 65865 after January 1, 1988, unless prior to that adoption it has specifically found that the ordinance or development agreement is consistent with the General Plan.

(e) Prior to issuing a permit for any project or adopting any legislation which requires an initial study under the California Environmental Quality Act, and prior to issuing a permit for any demolition, conversion or change of use, and prior to taking any action which requires a finding of consistency with the General Plan, the City shall find that the proposed project or legislation is consistent with the Priority Policies established above. For any such permit issued or legislation adopted after January 1, 1988 the City shall also find that the project is consistent with the General Plan.

(Added by Proposition M, 11/4/86; amended by Ord. 188-15 , File No. 150871, App. 11/4/2015, Eff. 12/4/2015 )

AMENDMENT HISTORY

- Divisions (a), (b), (d), and (e) amended; Ord. 188-15 , Eff. 12/4/2015.

# SEC. 102. DEFINITIONS.

*(See Interpretations related to this Section.)*

For the purposes of this Code, certain words and terms used herein are defined as set forth in this and the following sections. Additional definitions applicable to Signs are set forth in Section 602. Additional definitions applicable to development impact fees and requirements that authorize the payment of in-lieu fees are set forth in Section 401. Additional definitions applicable only to Downtown Residential Districts are set forth in Section 890. Additional definitions applicable only to the North Beach Neighborhood Commercial District and the North Beach Special Use District are set forth in Section 780.3. Additional definitions applicable only to the Bernal Heights Special Use District are set forth in Section 242. Additional definitions applicable only to Article 9, Mission Bay Districts, are set forth in Section 996. All words used in the present tense shall include the future. All words in the plural number shall include the singular number, and all words in the singular number shall include the plural number, unless the natural construction of the wording indicates otherwise. The word "shall" is mandatory and not directory. Whenever any of the following terms is used it shall mean the corresponding officer, department, board or commission or its successor of the City and County of San Francisco, State of California, herein referred to as the City: Assessor, Board of Supervisors, Planning Department, Department of Public Works, Director of Planning, Planning Commission, or Zoning Administrator. In each case, the term shall be deemed to include an employee of any such officer or department of the City who is lawfully authorized to perform any duty or exercise any power as a representative or agent of that officer or department.

(Amended by Ord. 217-16; Ord. 129-17; Ord. 70-23; see Sec. 102 history note.)

## A

***Accessory Use.*** A related minor Use that is either necessary to the operation or enjoyment of a lawful Principal Use or Conditional Use, or appropriate, incidental, and subordinate to any such use, and is located on the same lot. Accessory Uses are regulated by Sections 204 through 204.5 and Sections 703(d), 803.2(d), 803.3(b)(1)(C), 825(c)(1)(C), and 986 of this Code.

(Added by Ord. 129-17; amended by Ord. 202-18; 208-19; Ord. 63-20; see Sec. 102 history note.)

***Adjacent Building.*** Generally, a building on a lot adjoining the subject lot along a side lot line.

***Adult Business.*** A Retail Sales and Service Use that includes the following: adult bookstore or adult video store, as defined by Section 791 of the Police Code; adult theater, as defined by Section 791 of the Police Code; and encounter studio, as defined by Section 1072.1 of the Police Code. Such use shall be located no less than 1,000 feet from another Adult Business use.

***Adult Sex Venue*** [2] A Retail Sales and Service Use that operates pursuant to Health Code Article 47 [2] An Adult Sex Venue may include bathhouse facilities such as pools, tubs, or steam rooms, and is eligible for a Limited Live Performance permit.

(Added by Ord. 75-22; see Sec. 102 history note.)

***Agricultural and Beverage Processing 1.*** An Industrial use that involves the processing of agricultural products and beverages with a low potential for noxious fumes, noise, and nuisance to the surrounding area, including but not limited to bottling plants, breweries, dairy products plant, malt manufacturing or processing plant, fish curing, smoking, or drying, cereal manufacturing, liquor distillery, manufacturing of felt or shoddy, processing of hair or products derived from hair, pickles, sauerkraut, vinegar, yeast, soda or soda compounds, meat products, and fish oil. This use does not include the processing of wood pulp, and is subject to the operating conditions outlined in Section 202.2(d).

(Amended by Ord. 229-17; see Sec. 102 history note.)

***Agricultural and Beverage Processing 2.*** An Industrial Use that involves the processing of agricultural products and beverages with a high potential for noxious fumes, noise, and nuisance to the surrounding area, including but not limited to a flour mill; sugar refinery; manufacturer of cannabis products or extracts that are derived by using volatile organic compounds (any use requiring License Type 7—Manufacturer 2, as defined in California Business and Professions Code, Division 10); and facility for wool pulling or scouring. This use does not include the processing of wood pulp, and is subject to the operating conditions outlined in Section 202.2(d).

(Amended by Ord. 229-17; see Sec. 102 history note.)

***Agriculture.*** A Use Category that includes Industrial Agriculture, Neighborhood Agriculture, and Large-Scale Urban Agriculture.

(Amended by Ord. 229-17; see Sec. 102 history note.)

***Agriculture, Industrial.*** An Agricultural use that involves the cultivation of plants for wholesale sales or industrial uses. This use includes, but is not limited to, plant nurseries and cannabis cultivation operations, and is subject to the location and operating conditions listed in Section 202.2(c). For the cultivation of cannabis, this definition includes all cultivation pursuant to state license types that allow for indoor and/or mixed-light cultivation with up to 22,000 sq. ft. of canopy.

(Amended by Ord. 229-17; see Sec. 102 history note.)

***Agriculture, Large-Scale Urban.*** An Agricultural Use that is characterized by the use of land for the production of food or horticultural crops to be harvested, sold, donated, or otherwise not used or consumed by the operator of the premises that occur: (a) on a plot of land one acre or larger or (b) on smaller parcels that cannot meet the physical and operational standards for Neighborhood Agriculture. This use is subject to location and operational conditions outlined in Section 202.2(c) and does not include any cannabis-related use or any other agricultural activities, including the cultivation of cannabis for personal use.

(Amended by Ord. 229-17; see Sec. 102 history note.)

***Agriculture, Neighborhood.*** An Agricultural Use that occupies less than one acre for the production of food or horticultural crops to be harvested, sold, or donated and complies with the con trols and standards herein. The use includes, but is not limited to, home, kitchen,

and roof gardens. Farms that qualify as Neighborhood Agricultural Use may include, but are not limited to, community gardens, community-supported agriculture, market gardens, and private farms. Neighborhood Agricultural Use may be principal or accessory use. This use is subject to location and operational conditions outlined in Section 202.2(c) and does not include any cannabis-related use or any other agricultural activities, including the cultivation of cannabis for personal use.

(Amended by Ord. 229-17; see Sec. 102 history note.)

***Agriculture, Urban.*** Any subgrouping of Agricultural Uses that includes either Neighborhood Agriculture or Large-Scale Urban Agriculture.

***Alley.*** A right-of-way, less than 30 feet in width, permanently dedicated to common and general use by the public.

***Ambulance Service.*** See Service, Ambulance.

***Animal Hospital.*** A Retail Sales and Service Use that provides medical care and accessory boarding services for animals, not including a Kennel.

***Arts Activities.*** A retail Entertainment, Arts and Recreation Use that includes performance, exhibition (except exhibition of films), rehearsal, production, post-production and some schools of any of the following: dance; music; dramatic art; film; video; graphic art; painting; drawing; sculpture; small-scale glassworks; ceramics; textiles; woodworking; photography; custom-made jewelry or apparel; and other visual, performance, and sound arts and craft. It shall exclude accredited Schools and Post-Secondary Educational Institutions. It shall include commercial arts and art-related business service uses including, but not limited to: recording and editing services; small-scale film and video developing and printing; titling; video and film libraries; special effects production; fashion and photo stylists; production, sale, and rental of theatrical wardrobes; and studio property production and rental companies. Arts spaces shall include studios, workshops, archives, and theaters, and other similar spaces customarily used principally for arts activities, exclusive of a Movie Theater, General Entertainment, arcades that provide eleven or more amusement game devices, Adult Business, and any other establishment where liquor is customarily served during performances.

(Amended by Ord. 129-17; Ord. 202-18; Ord. 285-18; Ord. 205-19; see Sec. 102 history note.)

***Automobile Assembly.*** An Industrial Use that involves the assembly of parts for the purpose of manufacturing automobiles, trucks, buses, or motorcycles. This use is subject to operational and location restrictions outlined in Section 202.2(d) of this Code.

***Automobile Wrecking.*** An Industrial Use that includes the storage of vehicles in not in operational condition and/or sale of used automobile parts, or for the storage, dismantling, or abandonment of junk, automobiles, trailers, machinery or parts thereof. This use is subject to operational and location restrictions outlined in Section 202.2(d) of this Code.

***Automobile Sale or Rental.*** A Retail Automotive Use that provides vehicle sales or rentals within a building or on an open lot.

***Automotive Repair.*** A Retail Automotive Use that provides any of the following automotive repair services, when conducted within an enclosed building having no openings, other than fixed windows or exits required by law, located within 50 feet of any R District: minor auto repair, engine repair, rebuilding, or installation of power train components, reconditioning of badly worn or damaged motor vehicles, collision service, or full body paint spraying. It may include other services for automobiles including, but not limited to, accessory towing, if all towed vehicles stored on the premises are limited to those vehicles that are to be repaired on the premises.

***Automotive Service.*** A subgrouping of Retail Automotive Uses providing services for motor vehicles that includes Gas Station, Automotive Service Station, Automotive Repair, and Automotive Wash.

(Amended by Ord. 188-15; see Sec. 102 history note.)

***Automotive Service Station.*** A Retail Automotive Use that provides motor fuels and lubricating oils directly into motor vehicles and minor auto repairs (excluding engine repair, rebuilding, or installation of power train components, reconditioning of badly worn or damaged motor vehicles, collision service, or full body paint spraying) and services that remain incidental to the principal sale of motor fuel. Repairs shall be conducted within no more than three enclosed service bays in buildings having no openings, other than fixed windows or exits required by law, located within 40 feet of any R District. It may include other incidental services for automobiles including, but not limited to, accessory towing, if the number of towing vehicles does not exceed one, and all towed vehicles stored on the premises are limited to those vehicles that are to be repaired on the premises. This use is subject to the controls in Sections 187.1 and 202.2(b).

(Amended by Ord. 188-15; Ord. 129-17; Ord. 264-22; see Sec. 102 history note.)

***Automotive Use.*** A Commercial Use category that includes Automotive Repair, Ambulance Services, Automobile Sale or Rental, Automotive Service Station, Automotive Wash, Electric Vehicle Charging Location, Fleet Charging, Gas Station, Parcel Delivery Service, Private Parking Garage, Private Parking Lot, Public Parking Garage, Public Parking Lot, Vehicle Storage Garage, Vehicle Storage Lot, and Motor Vehicle Tow Service. All Automotive Uses that have Vehicular Use Areas defined in this Section of the Code shall meet the screening requirements for vehicular use areas in Section 142.

(Amended by Ord. 202-18; Ord. 190-22; see Sec. 102 history note.)

***Automotive Use, Non-Retail.*** A subcategory of Automotive Use that includes Ambulance Services, Fleet Charging, Parcel Delivery Service, Private Parking Garage, Private Parking Lot, and Motor Vehicle Tow Service.

(Amended by Ord. 202-18; Ord. 190-22; see Sec. 102 history note.)

***Automotive Use, Retail.*** A subcategory of Automotive Use that includes Automotive Repair, Automotive Sale or Rental, Automobile Service Station, Automotive Wash, Electric Vehicle Charging Location, Gas Station, Public Parking Garage, Public Parking Lot, Vehicle Storage Garage, and Vehicle Storage Lot.

(Amended by Ord. 190-22; see Sec. 102 history note.)

***Automotive Wash.*** A Retail Automotive Use that provides cleaning and polishing of motor vehicles, including self-service operations. This use is subject to the location and operational restrictions in Section 202.2(e).

***Awning.*** A light roof-like structure, supported entirely by the exterior wall of a building; consisting of a fixed or movable frame covered with cloth, plastic, or metal; extending over doors, windows, and/or show windows; with the purpose of providing protection from sun and rain and/or embellishment of the façade; as further regulated in Section 3105 of the Building Code.

## B

***Bar.*** A Retail Sales and Service Use that provides on-site alcoholic beverage sales for drinking on the premises, including bars serving beer, wine, and/or liquor to the customer where no person under 21 years of age is admitted (with Alcoholic Beverage Control [ABC] license types 23, 42, 48, or 61), drinking establishments serving beer where minors are present (with ABC license types 40 or 60) in conjunction with other uses such as Movie Theaters and General Entertainment, and bars serving wine operated by licensed winegrowers (with ABC license type 02). Such businesses shall operate with the specified conditions in Section 202.2(a). A non-profit theater that provides on-site alcoholic beverage sales only for consumption by ticket-holding patrons on the premises, with ABC license type 64, shall not be considered a Bar use. A music entertainment facility that is authorized to sell beer, wine, and distilled spirits at retail for consumption on the premises, with ABC license type 90, shall not be considered a Bar use.

(Amended by Ord. 188-15; Ord. 205-19; Ord. 249-23; see Sec. 102 history note.)

***Basement.*** See Story.

***Bedroom.*** A room primarily used for sleeping that meets the minimum requirements as defined in the Building Code for sleeping rooms.

***Board of Supervisors (Board).*** The Board of Supervisors of the City and County of San Francisco.

***Bona Fide Eating Place.*** A place that is regularly and in a bona fide manner used and kept open for the service of meals to guests for compensation and that has suitable kitchen facilities connected therewith, containing conveniences for cooking of an assortment of foods that may be required for ordinary meals.

(a) "Meals" shall mean an assortment of foods commonly ordered at various hours of the day for breakfast, lunch, or dinner. Incidental food service, comprised only of appetizers to accompany drinks, is not considered a meal. Incidental, sporadic, or infrequent sales of meals or a mere offering of meals without actual sales is not compliance.

(b) "Guests" shall mean persons who, during the hours when meals are regularly served therein, come to a bona fide public eating place for the purpose of obtaining, and actually order and obtain at such time, in good faith, a meal therein. Nothing in this section, however, shall be construed to require that any food be sold or purchased with any beverage.

(c) Actual and substantial sales of meals are required, during the normal days and meal hours that a bona fide public eating place is open, provided that "normal days of operation" shall mean a minimum of five days a week and "normal hours" of operation for meal service shall mean approximately 7:00 a.m. to 11:00 a.m. if open for breakfast; 11:00 a.m. to 2:00 p.m. if open for lunch; or 5:00 p.m. to 10:00 p.m. if open for dinner.

(d) The premises must be equipped and maintained in good faith. This means the premises must possess working refrigeration and cooking devices, pots, pans, utensils, table service, condiment dispensers, menus, signs, and enough goods to make substantial meals. The premises must comply with all regulations of the Department of Public Health.

(e) The establishment must secure significant revenue from food and non-alcoholic beverage sales. Significant revenue from food and non-alcoholic beverage sales shall mean either:

(1) A minimum of 51% of the establishment’s gross receipts shall be from food sales prepared and sold to guests on the premises. Records of the establishment’s gross receipts shall be provided to the Department upon request; or

(2) Annual gross food and non-alcoholic beverage sales prepared and sold to guests on the premises of at least $4,200 per occupant based on the premises’ maximum occupant load as determined and approved by the Fire Department and Department of Building Inspection. Records of the establishment’s gross sales shall be provided to the Department upon request. The Zoning Administrator may adjust the amount of $4,200 per occupant each year, provided that such adjustments are supported by specific financial and economic criteria, including but not limited to a review of the restaurant market, costs, prices, profits, and loses,[1] and recognizing the differences in sizes and types of establishments.

(f) A "bona fide eating place" does not include an Adult Business as defined in this Section of the Code.

(g) For a place that has also established a Nighttime Entertainment Use and that only provides on-site alcoholic beverage sales for consumption by ticket-holding patrons on the premises during the normal hours of operation of entertainment activities, paragraphs (c) and (e) do not apply, but actual and substantial sales of meals are required during the normal hours of operation. For purposes of this paragraph, the “normal hours of operation” shall include two hours prior to, and one hour after, entertainment activities, but may not exceed eight total hours in a calendar day. This paragraph (g) does not apply to a place located in the Broadway Neighborhood Commercial District, North Beach Neighborhood Commercial District, Pacific Avenue Neighborhood Commercial District, or Polk Street Neighborhood Commercial District.

(Amended by Ord. 205-19; Proposition H, 11/3/2020; see Sec. 102 history note.)

***Building.*** Any structure having a roof supported by columns or walls.

## C

***Cannabis Retail.*** A Retail Sales and Service Use that sells or otherwise provides cannabis and cannabis-related products for adult use, and that may also include the sale or provision of cannabis for medicinal use. A Cannabis Retail establishment may only be operated by the holder of (a) a valid license from the State of California (License Type 10—Retailer, as defined in California Business and Professions Code, Division 10) and (b) a valid permit from the City's Office of Cannabis. This use is subject to operating and location restrictions set forth in Section 202.2(a).

(Added by Ord. 229-17; see Sec. 102 history note.)

***Canopy.*** A light roof-like structure, supported by the exterior wall of a building and on columns or wholly on columns, consisting of a fixed or movable frame covered with approved cloth, plastic or metal, extending over entrance doorways only, with the purpose of providing protection from sun and rain and/or embellishment of the façade, as further regulated in Section 3105 of the Building Code.

***Catering.*** A Non-Retail Sales and Service Use that involves the preparation and delivery of goods including the following items: food, beverages; balloons, flowers, plants, party decorations and favors; or cigarettes/candy.

***Chair/Foot Massage.*** See Massage, Chair/Foot.

***Child Care Facility.*** An Institutional Community Use defined in California Health and Safety Code Section 1596.750 that provides less than 24-hour care for children by licensed personnel and meets the open-space and other requirements of the State of California and other authorities.

***City.*** The City and County of San Francisco.

***Commercial to Residential Adaptive Reuse.*** Commercial to Residential Adaptive Reuse shall mean to change the use of an existing Gross Floor Area from a non-residential use, other than a hotel use, to a residential use pursuant to Section 210.5.

(Added by Ord. 122-23; Ord. 159-23; see Sec. 102 history note.)

***Commercial Use.*** A land use with the sole or chief emphasis on making financial gain, including but not limited to Agricultural Uses, Industrial Uses, Sales and Service Uses, Retail Entertainment Uses, and Auto Uses.

***Commission.*** The San Francisco Planning Commission.

***Community Facility.*** An Institutional Community Use that includes community clubhouses, neighborhood centers, community cultural centers, or other community facilities not publicly owned but open for public use in which the chief activity is not carried on as a gainful business and whose chief function is the gathering of persons from the immediate neighborhood in a structure for the purposes of recreation, culture, social interaction, health care, or education other than Institutional Uses as defined in this Section.

***Community Facility, Private.*** An Institutional Community Use that includes a private lodge, private clubhouse, and private recreational facility other than a Community Facility as defined in this section, and which is not operated as a gainful business.

***Community Recycling Collection Center.*** A Utility and Infrastructure Use that collects, stores, or handles recyclable materials, including glass and glass bottles, newspaper, aluminum, paper and paper products, plastic and other materials which may be processed and recovered, if within a completely enclosed container or building, having no openings other than fixed windows or exits required by law, provided that: (1) Flammable materials are collected and stored in metal containers; and (2) Collection hours are limited to 9:00 a.m. to 7:00 p.m. daily. It does not include the storage, exchange, packing, disassembling or handling of junk, waste, used furniture and household equipment, used cars in operable condition, used or salvaged machinery, or salvaged house-wrecking and structural steel materials and equipment.

***Condition(s) of Approval.*** A condition or set of written conditions imposed by the Planning Commission or another permit-approving or issuing City agency or appellate body to which a project applicant agrees to adhere and fulfill when it receives approval for the construction of a development project subject to this Article.

***Conditional (or Conditionally Permitted) Use.*** Conditional Use allows the Planning Commission to consider uses or projects that may be necessary or desirable in a particular neighborhood, but which are not allowed as a matter of right within a particular zoning district. Whether a use is conditional in a given district is indicated in this Code. Sections of this Code that govern Conditional Uses include, but are not limited to Sections 178, 179, 303, and 303.1.

(Added by Ord. 129-17; amended by Ord. 208-19; see Sec. 102 history note.)

***Corner Lot.*** See Lot, Corner.

***Cottage Food Operation.*** An Accessory Use to a Dwelling Unit as defined in Section 113758 of the California State Health and Safety Code.

***Court.*** Any space on a lot other than a yard that, from a point not more than two feet above the floor line of the lowest story in the building on the lot in which there are windows from rooms abutting and served by the court, is open and unobstructed to the sky, except for obstructions permitted by this Code. An "outer court" is a court, one entire side or end of which is bounded by a front setback, a rear yard, a side yard, a front lot line, a street, or an alley. An "inner court" is any court that is not an outer court.

## D

***DBI.*** The San Francisco Department of Building Inspection or its successor.

***Department.*** See Planning Department.

***"Development Application"*** shall mean any application for a building permit, site permit, Conditional Use, Variance, Large Project Authorization, HOME-SF Project Authorization, authorization pursuant to Planning Code Sections 305.1, 309, 309.1, or 322, or for any

other authorization of a development project required to be approved by the Zoning Administrator or Planning Commission.

(Added by Ord. 15-19; see Sec. 102 history note.)

***Development Impact Fee.*** A fee imposed on a development project as a condition of approval to mitigate the impacts of increased demand for public services, facilities, or housing caused by the development project that may or may not be an impact fee governed by the California Mitigation Fee Act (California Government Code Section 66000, *et seq.*).

***Design Professional.*** A Non-Retail Sales and Service Use that provides professional design services to the general public or to other businesses and includes architectural, landscape architectural, engineering, interior design, and industrial design services. It does not include (1) the design services of graphic artists or other visual artists which are included in the definition of Arts Activities; or (2) the services of advertising agencies or other services which are included in the definition of Retail Professional Service or Non-Retail Professional Service, Financial Service, or Health Service. Design Professional Uses in Neighborhood Commercial Districts are subject to the operating restrictions outlined in Section 202.2(i).

(Amended by Ord. 202-18; Ord. 233-21; Ord. 37-22; Ord. 249-23; see Sec. 102 history note.)

***Designated Child Care Unit.*** A Dwelling Unit that is designated for use as a State-licensed Small Family Child Care Home and meets the applicable standards established in Section 414A.6.

(Added by Ord. 7-19; see Sec. 102 history note.)

***Diagonal Dimension.*** See Plan Dimensions.

(Added by Ord. 206-19; see Sec. 102 history note.)

***Director.*** The Director of the Planning Department or his or her designee.

***District.*** A portion of the territory of the City, as shown on the Zoning Map, within which certain regulations and requirements or various combinations thereof apply under the provisions of this Code. The term "district" shall include any use, special use, height and bulk, or special sign district. The classes of use districts are described in Section 201 of this Code.

***Drive-Up Facility.*** A Use Characteristic that includes a structure designed for drive-to or drive-through trade which provides service to patrons while in private motor vehicles, excluding Automotive Gas Station, Automotive Service Station, Automotive Repair, and Automotive Wash.

***DPW.*** The Department of Public Works or its successor.

***Dwelling.*** A building, or portion thereof, containing one or more Dwelling Units. A "one-family dwelling" is a building containing exclusively a single Dwelling Unit. A "two-family dwelling" is a building containing exclusively two Dwelling Units. A "three-family dwelling" is a building containing exclusively three Dwelling Units.

***Dwelling Unit.*** A Residential Use defined as a room or suite of two or more rooms that is designed for, or is occupied by, one family doing its own cooking therein and having only one kitchen. A Dwelling Unit shall also include “employee housing” when providing accommodations for six or fewer employees, as provided in State Health and Safety Code §17021.5. A housekeeping room as defined in the Housing Code shall be a Dwelling Unit for purposes of this Code. For the purposes of this Code, a Live/Work Unit, as defined in this Section, shall not be considered a Dwelling Unit.

(Amended by Ord. 248-23; see Sec. 102 history note.)

***Dwelling Unit, Accessory, or ADU.*** Also known as a Secondary Unit or In-Law Unit, is a Dwelling Unit that meets all the requirements of Section 207.1 or Section 207.2 and that is accessory to at least one other Dwelling Unit on the same lot. A detached ADU shall not share structural walls with the primary structure on the lot. Height for detached ADUs located outside the buildable area shall be measured from existing grade at any given point to either a) the highest point of a finished roof in the case of a flat roof or b) the average height of a pitched roof or stepped roof, or similarly sculptured roof form. Height for detached ADUs located outside the buildable area shall not be eligible for any exemptions described in Planning Code subsection 260(b).

(Added by Ords. 161-15 and 162-15; amended by Ord. 162-16; Ord. 95-17; Ord. 195-18; Ord. 116-19; Ord. 53-23; Ord. 62-24; see Sec. 102 history note.)

***Dwelling Unit, Junior Accessory, or JADU.*** A Dwelling Unit that meets all the requirements of Section 207.2, and that:

(a) is accessory to at least one other Dwelling Unit on the same lot;

(b) is no more than 500 square feet of Gross Floor Area;

(c) is contained entirely within an existing or proposed single-family structure;

(d) may include separate sanitation facilities, or may share sanitation facilities with the existing structure;

(e) is owner-occupied, unless the owner resides in the remaining portion of the structure; provided, however, that owner-occupancy shall not be required if the owner is a governmental agency, land trust, or housing organization;

(f) includes an entrance to the Junior Accessory Dwelling Unit that is separate from the main entrance to the proposed or existing single-family structure; and

(g) includes an efficiency kitchen that meets the requirements of California Government Code Section 66333(f), including a cooking facility with appliances, and a food preparation counter and storage cabinets that are of reasonable size in relation to the size of the Junior Accessory Dwelling Unit.

(Added by Ord. 53-23; amended by Ord. 62-24; Ord. 297-24; see Sec. 102 history note.)

## E

***Eating and Drinking Use.*** A grouping of Retail Sales and Service Uses that provide food and/or beverages for either on- or off-site food consumption including Bars, Restaurants, and Limited-Restaurants. Eating and Drinking Uses are subject to the conditions in Section 202.2(a).

(Amended by Ord. 129-17; see Sec. 102 history note.)

***Electric Vehicle Charging Location.*** Automotive Use, Retail that provides electricity to electric motor vehicles through more than one Electric Vehicle Charging Stations on a retail basis to the general public as a primary use. Electric Vehicle Charging Locations may include ancillary services, including but not limited to restrooms, self-service vending, and limited retail amenities primarily for the benefit of customers charging their vehicles.

(Added by Ord. 190-22; see Sec. 102 history note.)

***Electric Vehicle Charging Station.*** An electric vehicle charging space served by an electric vehicle charger or other charging equipment.

(Added by Ord. 190-22; see Sec. 102 history note.)

***Entertainment.*** See also Entertainment, Arts and Recreation Use, General Entertainment, Limited Live Performance, Nighttime Entertainment, and Outdoor Entertainment.

***Entertainment, General.*** A Retail Entertainment, Arts and Recreation Use that provides entertainment or leisure pursuits to the general public including dramatic and musical performances where alcohol is not served during performances, arcades that provide eleven or more amusement game devices (such as video games, pinball machines, or other such similar mechanical and electronic amusement devices), billiard halls, bowling alleys, skating rinks, and mini-golf, when conducted within a completely enclosed building, and which is adequately soundproofed or insulated so as to confine incidental noise to the premises. Mechanical amusement devices are further regulated in Sections 1036 through 1036.24 of the Police Code. The use may include a non-profit theater with ABC license Type 64 and a music entertainment facility with ABC license Type 90, provided that alcohol is not served during performances.

(Amended by Ord. 129-17; Ord. 205-19; Ord. 249-23; see Sec. 102 history note.)

***Entertainment, Nighttime.*** A Retail Entertainment, Arts and Recreation Use that includes dance halls, discotheques, nightclubs, private clubs, and other similar evening-oriented entertainment activities which require dance hall keeper police permits or Place of Entertainment police permits, as defined in Section 1060 of the Police Code, which are not limited to non-amplified live entertainment, including Restaurants and Bars which present such activities. Nighttime Entertainment uses do not include any Arts Activity, any theater performance space which does not serve alcoholic beverages during performances, or any temporary uses permitted pursuant to Sections 205 through 205.5 of this Code. This use is also subject to the controls in Section 202.11. Nighttime Entertainment uses are subject to the Entertainment Commission's Good Neighbor Policy. The use may include a non-profit theater with ABC license Type 64 and a music entertainment facility with ABC license Type 90.

(Amended by Ord. 111-21; Ord. 70-23; Ord. 249-23; see Sec. 102 history note.)

***Entertainment, Outdoor.*** A Retail Entertainment, Arts and Recreation Use that includes circuses, carnivals, or other amusement enterprises not conducted within a building, and conducted on premises not less than 200 feet from any R District.

***Entertainment, Arts and Recreation Use.*** A Use Category that includes Arts Activities, General Entertainment, Livery Stables, Movie Theater, Nighttime Entertainment, Open Recreation Area, Outdoor Entertainment, Passive Outdoor Recreation and Sports Stadiums. Adult Business is not included in this definition, except for the purposes of Development Impact Fee Calculation as described in Article 4.

(Amended by Ord. 129-17; Ord. 205-19; see Sec. 102 history note.)

## F

***Façade.*** An entire exterior wall assembly including, but not limited to, all finishes and siding, fenestration, doors, recesses, openings, bays, parapets, sheathing, and framing.

***Façade, Front.*** The portion of the Façade fronting a right-of-way, or the portion of the Façade most closely complying with that definition, as in the case of a flag lot. Where a lot has more than one frontage on rights-of-way. all such frontages shall be considered Front Façades except where a façade meets the definition of "Rear Façade."

***Façades, Principal.*** Exterior walls of a Building that are adjacent to or front on a public street, park, or plaza.

***Façade, Rear.*** That portion of the Façade facing the part of a lot that most closely complies with the applicable Planning Code rear yard requirements.

***Fair Return on Investment.*** Where the property owner does not own the business, the before income tax total annual rent and other compensation received from the business for the lease of the land and buildings, less the expenses of the lessor, on a cash basis. Where the property owner also owns the business, the before income tax profit on the sale of all goods and services at the business on a cash basis; for an Automotive Service Station business, it shall include the sale of gasoline, less the cost of goods sold and operating costs.

***Family.*** A single and separate living unit, consisting of either one person, or two or more persons related by blood, marriage or adoption or by legal guardianship pursuant to court order, plus necessary domestic servants and not more than three roomers or boarders; a group of not more than five persons unrelated by blood, marriage or adoption, or such legal guardianship unless the group has the attributes of a family in that it (a) has control over its membership and composition; (b) purchases its food and prepares and consumes its meals collectively; and (c) determines its own rules or organization and utilization of the residential space it occupies. A group occupying group housing or a hotel, motel, or any other building or portion thereof other than a Dwelling, shall not be deemed to be a family.

(Amended by Ord. 63-20; see Sec. 102 history note.)

***Fleet Charging.*** Automotive Use, Non-Retail that provides electricity to electric motor vehicles through one or more Electric Vehicle Charging Stations that are dedicated or reserved for private parties pursuant to contract or other agreement and are not available to the general public. Fleet Charging is not allowed as an accessory use to any other principal use. Parcel Delivery Service activity, including unloading, sorting, and/or reloading merchandise for deliveries, is prohibited as part of a Fleet Charging use.

(Added by Ord. 190-22; amended by Ord. 2-24; see Sec. 102 history note.)

***Flexible Retail.*** A Retail Sales and Service Use subject to the requirements of Section 202.9, that combines a minimum of two of the following distinct Uses within a space that may be operated by one or more business operators:

(1) Arts Activities;

(2) Restaurant, Limited;

(3) Retail Sales and Services, General;

(4) Service, Personal;

(5) Service, Retail Professional; and

(6) Trade Shop.

(Added by Ord. 285-18; amended by Ord. 111-21; Ord. 249-23; see Sec. 102 history note.)

***Flexible Workspace.*** A Retail Sales and Service use that is a combination of any uses within the Retail Sales and Service use category or a General Entertainment use that operates in conjunction with a principally or conditionally permitted Non-Retail Sales and Service use other than a Commercial Storage, Wholesale Sales, or Wholesale Storage use. The Retail Sales and Service or General Entertainment portion of the use shall be at least one-third of the overall Gross Floor Area and must face the street.

(Added by Ord. 122-23; Ord. 159-23; see Sec. 102 history note.)

***Floor Area, Gross.*** In Districts other than C-3, the Central SoMa Special Use District and the Van Ness Special Use District, the sum of the gross areas of the several floors of a building or buildings, measured from the exterior faces of exterior walls or from the centerlines of walls separating two buildings. Where columns are outside and separated from an exterior wall (curtain wall) that encloses the building space or are otherwise so arranged that the curtain wall is clearly separate from the structural members, the exterior face of the curtain wall shall be the line of measurement, and the area of the columns themselves at each floor shall also be counted.

In the C-3 and Central SoMa and Van Ness Special Use Districts, the sum of the gross areas of the several floors of a building or buildings, measured along the glass line at windows at a height of four feet above the finished floor and along a projected straight line parallel to the overall building wall plane connecting the ends of individual windows, provided, however, that such line shall not be inward of the interior face of the wall.

(a) Except as specifically excluded in this definition, "Gross Floor Area" shall include, but not be limited to, the following:

(1) Basement and cellar space, including tenants' storage areas and all other spaces except that used only for storage or services necessary to the operation or maintenance of the building itself;

(2) Elevator shafts, stairwells, exit enclosures, and smoke-proof enclosures at each floor;

(3) Floor space in penthouses except as specifically excluded in this definition;

(4) Attic space (whether or not a floor has been laid) capable of being made into habitable space;

(5) Floor space in balconies or mezzanines in the interior of the building;

(6) Floor space in open or roofed porches, arcades, or exterior balconies, if such porch, arcade, or balcony is located above the ground floor or first floor of occupancy above basement or garage and is used as the primary access to the interior space it serves;

(7) In districts other than the C-3 and Central SoMa Special Use District, floor space in accessory buildings; and

(8) In the C-3 and Central SoMa Special Use Districts, any floor area dedicated to accessory or non-accessory parking, except for bicycle parking, required off-street loading, and accessory parking as specified in subsection (b)(7); and

(9) Any other floor space not specifically excluded in this definition.

(b) "Gross Floor Area" shall not include the following:

(1) Basement and cellar space used only for storage or services necessary to the operation or maintenance of the building itself;

(2) Attic space not capable of being made into habitable space;

(3) Elevator or stair penthouses, accessory water tanks or cooling towers, and other mechanical equipment, appurtenances, and areas necessary to the operation or maintenance of the building itself, if located at the top of the building or separated therefrom only by other space not included in the gross floor area;

(4) Mechanical equipment, appurtenances, and areas necessary to the operation or maintenance of the building itself (A) if located at an intermediate story of the building and forming a complete floor level; or (B) in the C-3 and Central SoMa Special Use Districts, if located on a number of intermediate stories occupying less than a full floor level, provided that the mechanical equipment,

appurtenances, and areas are permanently separated from occupied floor areas and in aggregate area do not exceed the area of an average floor as determined by the Zoning Administrator;

(5) Outside stairs to the first floor of occupancy at the face of the building which the stairs serve, or fire escapes;

(6) Floor space dedicated to accessory parking that does not exceed the amount principally permitted as accessory, and is located on any Basement Story;

(7) In C-3 and CMUO Districts, floor space dedicated to parking which does not exceed the amount principally permitted as accessory, and is located underground;

(8) Bicycle parking that meets the standards of Sections 155.1 through 155.4 of this Code;

(9) Arcades, plazas, walkways, porches, breezeways, porticos and similar features (whether roofed or not), at or near street level, accessible to the general public and not substantially enclosed by exterior walls; and accessways to public transit lines, if open for use by the general public; all exclusive of areas devoted to sales, service, display, and other activities other than movement of persons;

(10) Balconies, porches, roof decks, terraces, courts and similar features, except those used for primary access as described in Paragraph (a)(6) above, provided that:

(A) If more than 70 percent of the perimeter of such an area is enclosed, either by building walls (exclusive of a railing or parapet not more than three feet eight inches high) or by such walls and interior lot lines, and the clear space is less than 15 feet in either dimension, the area shall not be excluded from Gross Floor Area unless it is fully open to the sky (except for roof eaves, cornices, or belt courses that project not more than two feet from the face of the building wall).

(B) If more than 70 percent of the perimeter of such an area is enclosed, either by building walls (exclusive of a railing or parapet not more than three feet eight inches high), or by such walls and interior lot lines, and the clear space is 15 feet or more in both dimensions: (i) The area shall be excluded from Gross Floor Area if it is fully open to the sky (except for roof eaves, cornices, or belt courses that project no more than two feet from the face of the building wall); and (ii) The area may have roofed areas along its perimeter which are also excluded from Gross Floor Area if the minimum clear open space between any such roof and the opposite wall or roof (whichever is closer) is maintained at 15 feet (with the above exceptions) and the roofed area does not exceed 10 feet in depth; (iii) In addition, when the clear open area exceeds 625 square feet, a canopy, gazebo, or similar roofed structure without walls may cover up to 10 percent of such open space without being counted as gross floor area.

(C) If, however, 70 percent or less of the perimeter of such an area is enclosed by building walls (exclusive of a railing or parapet not more than three feet eight inches high) or by such walls and interior lot lines, and the open side or sides face on a yard, street or court whose dimensions satisfy the requirements of this Code and all other applicable codes for instances in which required windows face upon such yard, street, or court, the area may be roofed to the extent permitted by such codes in instances in which required windows are involved;

(11) On lower, nonresidential floors, elevator shafts and other life-support systems serving exclusively the residential uses on the upper floors of a building;

(12) One-third of that portion of a window bay conforming to the requirements of Section 136(d)(2) that extends beyond the plane formed by the face of the façade on either side of the bay, but not to exceed seven square feet per bay window as measured at each floor;

(13) Ground floor area in the C-3-O, C-3-O(SD), C-3-S, C-3-S(SU), and C-3-G Districts, and in the Central SoMa Special Use District devoted to building or pedestrian circulation and building service;

(14) In the C-3-O, C-3-O(SD), C-3-S, C-3-S(SU), and C-3-G Districts, space devoted to personal services, restaurants, and retail sales of goods intended to meet the convenience shopping and service needs of downtown workers and residents, not to exceed 5,000 occupied square feet per use and, in total, not to exceed 75 percent of the area of the ground floor of the building plus the ground level, on-site open space. Said uses shall be located on the ground floor except that, in order to facilitate the creation of more spacious ground floor interior spaces, a portion of the said uses, in an amount to be determined pursuant to the provisions of Section 309, may be located on a mezzanine level;

(15) An interior space provided as an open space feature in accordance with the requirements of Section 138;

(16) Floor area in C-3 and Eastern Neighborhoods Mixed Use Districts devoted to child care facilities, provided that:

(A) Allowable indoor space is no less than 3,000 square feet and no more than 6,000 square feet;

(B) The facilities are made available rent free;

(C) Adequate outdoor space is provided adjacent, or easily accessible, to the facility. Spaces such as atriums, rooftops, or public parks may be used if they meet licensing requirements for child care facilities; and

(D) The space is used for child care for the life of the building as long as there is a demonstrated need. No change in use shall occur without a finding by the Planning Commission that there is a lack of need for child care and that the space will be used for a facility described in subsection (B)(17) below dealing with cultural, educational, recreational, religious, or social service facilities;

(17) Floor area in C-3 and Eastern Neighborhoods Mixed Use Districts permanently devoted to cultural, educational, recreational, religious, or social service facilities available to the general public at no cost or at a fee covering actual operating expenses, provided that such facilities are:

(A) Owned and operated by a nonprofit corporation or institution; or

(B) Are made available rent free for occupancy only by nonprofit corporations or institutions for such functions. Building area subject to this subsection shall be counted as Occupied Floor Area, except as provided in subsections (a) through (f) in the definition for Floor Area, Occupied, for the purpose of calculating the freight loading requirements for the project;

(18) In the C-3-O(SD) District, space devoted to personal services, eating and drinking uses, or retail sales of goods and that is located on the same level as the rooftop park on the Transbay Transit Center and directly accessible thereto by a direct publicly-accessible pedestrian connection meeting the standards of Section 138(j)(1); and

(19) In the C-3-O(SD) District, publicly-accessible space on any story above a height of 600 feet devoted to public accommodation that offers extensive views, including observation decks, sky lobbies, restaurants, bars, or other retail uses, as well as any elevators or other vertical circulation dedicated exclusively to accessing or servicing such space. The space must be open to the general public during normal business hours throughout the year, and may charge a nominal fee for access.

(20) [Expired]

(21) Any area devoted to bicycle parking, bicycle maintenance rooms, or car share spaces when such features are provided as part of a Development Project's compliance with the Transportation Demand Management Program set forth in Section 169 of the Planning Code.

(Amended by Ord. 52-15; Ord. 34-17; Ord. 13-18; Ord. 296-18; see Sec. 102 history note.)

***Floor Area, Occupied.*** Floor area devoted to, or capable of being devoted to, a principal or Conditional Use and its accessory uses. For purposes of computation, "Occupied Floor Area" shall consist of the Gross Floor Area, as defined in this Code, minus the following:

(a) Accessory parking and loading spaces and driveways, and maneuvering areas incidental thereto;

(b) Exterior walls of the building;

(c) Mechanical equipment, appurtenances, and areas necessary to the operation or maintenance of the building itself, wherever located in the building;

(d) Restrooms and space for storage and services necessary to the operation and maintenance of the building itself, wherever located in the building;

(e) Space in a retail store for store management, show windows, and dressing rooms, and for incidental repairs, processing, packaging, and stockroom storage of merchandise for sale on the premises; and

(f) Incidental storage space for the convenience of tenants.

(Amended by Ord. 99-17; see Sec. 102 history note.)

***Floor Area Ratio.*** The ratio of the Gross Floor Area of all the buildings on a lot to the area of the lot. In cases in which portions of the gross floor area of a building project horizontally beyond the lot lines, all such projecting gross floor area shall also be included in determining the floor area ratio.

***Floor Area, Usable.*** Generally, the sum of the gross areas of the several floors of a building, measured from the exterior walls or from the center lines of common walls separating two buildings. See alternative definition for the Bernal Heights Special Use District.

***Formula Retail.*** Formula Retail shall have the meaning set forth in Section 303.1 of the Planning Code.

## G

***Gas Station.*** A Retail Automotive Use that provides motor fuels, lubricating oils, air, and water directly into motor vehicles and without providing Automotive Repair services, and which also includes self-service operations that sell motor fuel only. This use is subject to the controls in Sections 202.2(b) and 187.1.

(Amended by Ord. 188-15; see Sec. 102 history note.)

***General Entertainment.*** See Entertainment, General.

***General Grocery.*** See Grocery, General.

***Gift Store-Tourist Oriented.*** A Retail Sales and Service Use that involves the marketing of small art goods, gifts, souvenirs, curios, or novelties to the public, particularly those who are visitors to San Francisco rather than local residents.

***Grain Elevator.*** An Industrial Use defined as a storage facility for grain that contains a bucket elevator or a pneumatic conveyor that scoops up grain from a lower level and deposits it in a silo or other storage facility. This use also covers the entire elevator complex including, but not limited to, receiving and testing offices, weighbridges, and storage facilities.

***Grocery, General.*** A Retail Sales and Services Use that:

(a) Offers a diverse variety of unrelated, non-complementary food and non-food commodities, such as beverages, dairy, dry goods, fresh produce and other perishable items, frozen foods, household products, and paper goods;

(b) May provide beer, wine, and/or liquor sales for consumption off the premises with a California Alcoholic Beverage Control Board License type 20 (off-sale beer and wine) or type 21 (off-sale general) that occupy less than 15% of the Occupied Floor Area of the establishment (including all areas devoted to the display and sale of alcoholic beverages);

(c) May prepare minor amounts of food on site for immediate consumption;

(d) Markets the majority of its merchandise at retail prices; and

(e) Shall operate with the specified conditions in Section 202.2(a)(1).

(f) Such businesses require Conditional Use authorization for conversion of a General Grocery use greater than 5,000 square feet, pursuant to Section 202.3 and 303(l).

(Amended by Ord. 188-15; Ord. 129-17; see Sec. 102 history note.)

***Grocery, Specialty.*** A Retail Sales and Services Use that:

(a) Offers specialty food products such as baked goods, pasta, cheese, confections, coffee, meat, seafood, produce, artisanal goods, and other specialty food products, and may also offer additional food and non-food commodities related or complementary to the specialty food products;

(b) May provide beer, wine, and/or liquor sales for consumption off the premises with a California Alcoholic Beverage Control Board License type 20 (off-sale beer and wine) or type 21 (off-sale general) which occupy less than 15% of the Occupied Floor Area of the establishment (including all areas devoted to the display and sale of alcoholic beverages);

(c) May prepare minor amounts of food on site for immediate consumption off-site with no seating permitted; and

(d) Markets the majority of its merchandise at retail prices.

(e) Such businesses that provide food or drink per subsections (b) and (c) above shall operate with the specified conditions in Section 202.2(a)(1).

(Amended by Ord. 188-15; Ord. 129-17; see Sec. 102 history note.)

***Gross Floor Area.*** See Floor Area, Gross

***Ground Floor.*** First Story, as defined under Story, below.

(Added by Ord. 206-19; see Sec. 102 history note.)

***Group Housing.*** A Residential Use that provides lodging or both meals and lodging, without individual or limited cooking facilities or kitchens, by prearrangement for 30 days or more at a time and intended as Long-Term Housing, in a space not defined by this Code as a Dwelling Unit. Except for Group Housing that also qualifies as Student Housing as defined in this Section 102, 100% Affordable Housing as defined in Planning Code Section 315, or housing operated by an organization with tax-exempt status under 26 United States Code Section 501(c)(3) providing access to the unit in furtherance of it$^{3}$ primary mission to provide housing, the residential square footage devoted to Group Housing shall include both common and private space in the following amounts: for every gross square foot of private space (including bedrooms and individual bathrooms), 0.5 gross square feet of common space shall be provided, with at least 15% of the common space devoted to communal kitchens with a minimum of one kitchen for every 15 Group Housing units. Group Housing shall include, but not necessarily be limited to, a Residential Hotel, boardinghouse, guesthouse, rooming house, lodging house, residence club, commune, fraternity or sorority house, monastery, nunnery, convent, or ashram. It shall also include group housing affiliated with and operated by a medical or educational institution, when not located on the same lot as such institution, which shall meet the applicable provisions of Section 304.5 of this Code concerning institutional master plans.

(Amended by Ord. 50-22; see Sec. 102 history note.)

***Gym.*** A Retail Sales and Service Use including a health club, fitness, gymnasium, or exercise facility when including equipment and space for weight-lifting and cardiovascular activities.

(Amended by Ord. 111-21; see Sec. 102 history note.)

## H

***Hazardous Waste Facility.*** An Industrial Use that includes any use involving the treatment, transfer, storage, resource recovery, disposal, or recycling of hazardous waste that is produced at an off-site facility, but shall not include a facility that: (1) manages only used oil, used oil filters, latex paint, antifreeze, small household batteries or lead acid batteries; or (2) establishes that it is not required to obtain a hazardous waste facility permit from the State of California. The terms "hazardous waste," "treatment," "transfer," "storage," "disposal," "off-site facility," and "used oil" as used herein shall have the meaning given those terms in the California Health and Safety Code, Division 20, Chapter 6.5, Articles 2 and 13, which are hereby incorporated by reference.

***Health Service.*** See Service, Health.

***Heavy Manufacturing.*** See Manufacturing, Heavy.

***Height (of a building or structure).*** The vertical distance by which a building or structure rises above a certain point of measurement. See Section 260 of this Code for how height is measured.

***Historic Building.*** A Historic Building is a building or structure that meets at least one of the following criteria:

- It is individually designated as a landmark under Article 10;
- It is listed as a contributor to an historic district listed in Article 10, or if the historic district does not list contributors, is determined to be a contributor through historic resource review;
- It is a Significant or Contributory Building under Article 11, with a Category I, II, III or IV rating;

- It has been listed or has been determined eligible for listing in the California Register of Historical Resources; or,
- It has been listed or has been determined eligible for listing in the National Register of Historic Places.

(Added by Ord. 248-23; amended by Ord. 297-24; see Sec. 102 history note.)

***Homeless Shelter.*** A Residential Use defined as living and/or sleeping accommodations without any fee to individuals and families who are homeless, as defined in the Federal Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 (S.896), as amended from time to time. Homeless Shelters shall comply with the requirements of the Standards of Care for City Shelters contained in Administrative Code, Chapter 20, Article XIII, including the requirement for operational standards in Section 20.404(d).

***Horizontal Elements.*** All roof areas and all floor plates, except floor plates at or below grade.

***Hospital.*** An Institutional Healthcare Use that includes a hospital, medical center, or other medical institution that provides facilities for inpatient or outpatient medical care and may also include medical offices, clinics, laboratories, and employee or student dormitories and other housing, operated by and affiliated with the institution, which institution has met the applicable provisions of Section 304.5 of this Code concerning Institutional Master Plans.

(Amended by Ord. 188-15; see Sec. 102 history note.)

***Hotel.*** A Retail Sales and Services Use that provides tourist accommodations, including guest rooms or suites, which are intended or designed to be used, rented, or hired out to guests (transient visitors) intending to occupy the room for less than 32 consecutive days. This definition also applies to buildings containing six or more guest rooms designated and certified as tourist units, under Chapter 41 of the San Francisco Administrative Code. For purposes of this Code, a Hotel does not include (except within the Bayshore-Hester Special Use District as provided for in Sections 713 and 780.2 of this Code) a Motel, which contains guest rooms or suites that are independently accessible from the outside, with garage or parking space located on the lot, and designed for, or occupied by, automobile-traveling transient visitors. Hotels shall be designed to include all lobbies, offices, and internal circulation to guest rooms and suites within and integral to the same enclosed building or buildings as the guest rooms or suites.

***Hotel, Residential.*** A Residential Use defined in Chapter 41 of the San Francisco Administrative Code that contains one or more residential hotel units. A residential hotel unit is a guest room, as defined in Section 203.7 of Chapter XII, Part II, of the San Francisco Municipal Code (Housing Code), which had been occupied by a permanent resident on September 23, 1979, or any guest room designated as a residential unit pursuant to Sections 41.6 or 41.7 of Chapter 41 of the San Francisco Administrative Code. Residential hotels are further defined and regulated in the Residential Hotel Unit Conversion and Demolition Ordinance, Chapter 41, of the San Francisco Administrative Code.

***Hours of Operation.*** A commercial Use Characteristic limiting the permitted hours during which any commercial establishment, not including automated teller machines, may be open for business. Other restrictions on the hours of operation of Movie Theaters, Adult Businesses, Adult Sex Venues, Nighttime Entertainment, and General Entertainment Uses shall apply pursuant to provisions in Section 303(p), when such uses are permitted as Conditional Uses. A Pharmacy may qualify for the exception to operate on a 24-hour basis provided in Section 202.2(a)(2) of the Code. The hours of operation of a principally permitted Adult Sex Venue are subject to the provisions in Section 202.2(a)(8).

(Amended by Ord. 129-17; Ord. 202-18; Ord. 75-22; Ord. 70-23; see Sec. 102 history note.)

## I

***Industrial Use.*** A Use Category containing the following uses: Agricultural and Beverage Processing 1 and 2, Automobile Wrecking, Automobile Assembly, Grain Elevator, Hazardous Waste Facility, Junkyard, Livestock Processing 1 and 2, Heavy Manufacturing 1, 2, and 3, Light Manufacturing, Metal Working, Ship Yard, Storage Yard, Volatile Materials Storage, and Truck Terminal.

(Amended by Ord. 229-17; Ord. 202-18; see Sec. 102 history note.)

***Infrastructure.*** Open space and recreational facilities; public realms improvements such as pedestrian improvements and streetscape improvements; public transit facilities; and community facilities such as libraries, child care facilities, and community centers.

***In-Kind Agreement.*** An agreement acceptable in form and substance to the City Attorney and the Director of Planning, under which the project sponsor agrees to provide a specific set of community improvements, at a specific phase of construction, in lieu of contribution to the relevant Fund.

***In Lieu Fee.*** A fee paid by a project sponsor in lieu of complying with a requirement of this Code and that is not a development impact fee governed by the Mitigation Fee Act.

***Institutional Community Use.*** A subcategory of Institutional Uses that includes Child Care Facility, Community Facility, Private Community Facility, Job Training, Religious Institution, Social Service or Philanthropic Facility, and Public Facility.

(Amended by Ord. 182-19, see Sec. 102 history note.)

***Institutional Education Use.*** A subcategory of Institutional Uses that includes Post-Secondary Educational Institution, School, and Trade School.

***Institutional Healthcare Use.*** A subcategory of Institutional Uses that includes Hospital, Medical Cannabis Dispensary, and Residential Care Facility.

***Institutional Use.*** A Use Category that includes Child Care Facility, Community Facility, Private Community Facility, Hospital, Job Training, Medical Cannabis Dispensary, Religious Institution, Residential Care Facility, Social Service or Philanthropic Facility, Post-Secondary Educational Institution, Public Facility, School, and Trade School.

(Amended by Ord. 63-20; see Sec. 102 history note.)

***Interior Lot.*** See Lot, Interior.

***Intermediate Length Occupancy.*** A Residential Use characteristic that applies to a Dwelling Unit offered for occupancy by a natural person for an initial stay, whether through lease, subscription, license, or otherwise, for a duration of greater than 30 consecutive days but less than one year. This use characteristic is subject to the requirements of Section 202.10.

(Added by Ord. 78-20; see Sec. 102 history note.)

***Internet Service Exchange.*** A Utility and Infrastructure Use defined as a location that contains any of the following uses (excluding a Wireless Telecommunications Services Facility): switching equipment (whether wireline or wireless) that joins or connects occupants, customers, or subscribers to enable customers or subscribers to transmit data, voice or video signals to each other; one or more computer systems and related equipment used to build, maintain, or process data, voice or video signals, and provide other data processing services; or a group of network servers.

(Amended by Ord. 166-16; see Sec. 102 history note.)

## J

***Jewelry Store.*** A Retail Sales and Service Use that primarily involves the sale of jewelry to the general public. It may involve sales of precious stones, gems, precious metals, gold and silver, or clocks and watches. Repair services or setting, custom design or manufacture of individual pieces of jewelry may also be provided.

***Job Training.*** A Institutional Community Use that provides job training and may also provide vocational counseling and job referrals.

***Junk Yard.*** An Industrial Use defined as an outdoor space where junk, waste, discarded or salvaged materials are stored or handled, including house-wrecking yards, used lumber yards, and places or yards for storage of salvaged house wrecking and structural steel materials and equipment, excluding automobile wrecking operations, which is defined as a separate use in this Section of the Code; yards or establishments for the sale, purchase, or storage of used cars or machinery in operable condition; and the processing of used, discarded, or salvaged materials as part of a permitted manufacturing operation in the same premises.

## K

***Kennel.*** A Retail Sales and Services Use where dogs, or dogs and cats, are boarded for compensation, or are cared for or trained for hire, or are kept for sale or bred for sale, where the care, breeding, or sale of the dogs, or dogs and cats, is the principal means of livelihood of the occupants of the premises.

(Amended by Ord. 111-21; see Sec. 102 history note.)

## L

***Laboratory.*** A Non-Retail Sales and Services Use intended or primarily suitable for scientific research. The space requirements of uses within this category include specialized facilities and/or built accommodations that distinguish the space from Office uses, Light Manufacturing, or Heavy Manufacturing. Examples of laboratories include the following:

(a) Chemistry, biochemistry, or analytical laboratory;

(b) Engineering laboratory;

(c) Development laboratory;

(d) Biological laboratories including those classified by the Centers for Disease Control (CDC) and National Institutes of Health (NIH) as Biosafety level 1, Biosafety level 2, or Biosafety level 3;

(e) Animal facility or vivarium, including laboratories classified by the CDC/NIH as Animal Biosafety level 1, Animal Biosafety level 2, or Animal Biosafety level 3;

(f) Support laboratory;

(g) Quality assurance/Quality control laboratory;

(h) Core laboratory; and

(i) Cannabis testing facility (any use requiring License Type 8—Testing Laboratory, as defined in California Business and Professions Code, Division 10).

(Amended by Ord. 229-17; see Sec. 102 history note.)

***Large-Scale Urban Agriculture.*** See Agriculture, Large Scale Urban.

***Laundromat.*** A Retail Sales and Service Use that is used for the purpose of washing, drying, dry cleaning, starching, or ironing, for the general public, wearing apparel, household linens, or other washable fabrics, or a place used or maintained for the storage, collection, or delivery of such articles for such service. A Laundromat use shall include any place, whether self-service or otherwise, maintained for the general public for the purpose of washing and drying wearing apparel, household linens, or other washable fabrics, by coin-operated, or card-operated laundry machinery.

(Amended by Ord. 209-21; see Sec. 102 history note.)

***Length (of a Building or Structure).*** See Plan Dimensions.

(Added by Ord. 206-19; see Sec. 102 history note.)

***Licensed Child Care Facility.*** A child care facility that has been issued a valid license by the California Department of Social Services pursuant to California Health and Safety Code Sections 1596.80-1596.875, 1596.95-1597.09, or 1597.30-1597.61.

***Life Science.*** A Non-Retail Sales and Service Use that involves the integration of natural and engineering sciences and advanced biological techniques using organisms, cells, and parts thereof for products and services. This includes the creation of products and services used to analyze and detect various illnesses, the design of products that cure illnesses, and/or the provision of capital goods and services, machinery, instruments, software, and reagents related to research and production. Life Science uses may utilize office, laboratory, light manufacturing, or other types of space. As a subset of Life Science uses, Life Science laboratories typically include biological laboratories and animal facilities or vivaria, as described in the Laboratory definition Subsections (d) and (e).

***Light Manufacturing.*** See Manufacturing, Light.

***Limited Live Performance.*** An Accessory Use as defined in Section 1060 of the Police Code

***Limited Restaurant.*** See Restaurant, Limited.

***Liquor Store.*** A Retail Sales and Service Use that sells beer, wine, or distilled spirits to a customer in an open or closed container for consumption off the premises and that needs a State of California Alcoholic Beverage Control Board License type 20 (off-sale beer and wine) or type 21 (off-sale general) This classification shall not include retail uses that:

(a) are both (1) classified as a General Grocery, a Specialty Grocery, or a Restaurant- Limited, and (2) have a Gross Floor Area devoted to alcoholic beverages that is within the applicable accessory use limits for the use district in which it is located, or

(b) have both (1) a Non-residential Use Size of greater than 10,000 gross square feet and (2) a gross floor area devoted to alcoholic beverages that is within accessory use limits as set forth in Section 204.3 or Section 703(d) of this Code, depending on the zoning district in which the use is located.

(c) For purposes of Planning Code Sections 249.5, 781.8, 781.9, 782, and 784, the retail uses explicitly exempted from this definition as set forth above shall only apply to General Grocery and Specialty Grocery stores that exceed 5,000 square feet in size and shall not:

(1) sell any malt beverage with an alcohol content greater than 5.7 percent by volume; any wine with an alcohol content of greater than 15 percent by volume, except for “dinner wines” that have been aged two years or more and maintained in a corked bottle; or any distilled spirits in container sizes smaller than 600 milliliters;

(2) devote more than 15 percent of the gross square footage of the establishment to the display and sale of alcoholic beverages; and

(3) sell single servings of beer in container sizes 24 ounces or smaller.

Liquor Store uses are subject to the operating conditions of Section 202.2(a)(6). Where conditionally permitted, the Conditional Use authorization shall also satisfy the conditions of Section 303(z).

(Amended by Ord. 129-17; Ord. 182-19; see Sec. 102 history note.)

***Livery Stable.*** A Retail Entertainment, Arts and Recreation Use where horses and carriages are kept for hire and where stabling is provided. This use also includes horse riding academies.

***Livestock Processing 1.*** An Industrial Use that involves the live storage, killing or dressing of poultry, rabbits or other small livestock, and/or the tanning or curing of raw hides or skins from an animal of any size. Direct sales to customers is permitted on site. This use is subject to the location and operating restrictions in Section 202.2(d).

***Livestock Processing 2.*** An Industrial Use that involves the live storage, killing or dressing of cows, pigs, goats, and other large livestock and/or the tanning or curing of raw hides or skins from an animal of any size. Direct sales to customers is permitted on site. This use is subject to the location and operating restrictions in Section 202.2(d).

***Live/Work Project.*** A Housing Project containing more than one Live/Work Unit.

***Live/Work Unit.*** A hybrid Residential and PDR Use that is defined as a structure or portion of a structure combining a residential living space for a group of persons including not more than four adults in the same unit with an integrated work space principally used by one or more of the residents of that unit; provided, however, that no otherwise qualifying portion of a structure that contains a Group A occupancy under the Building Code shall be considered a Live/Work Unit. No City official, department, board, or commission shall issue or approve a building permit or other land use entitlement authorizing a new live/work unit as defined here, except as authorized under Section 210.5, or as an accessory use under Section 204.4. Lawfully approved live/work units are subject to the provisions of Sections 181 and 317 of this Code.

(Amended by Ord. 122-23; Ord. 159-23; see Sec. 102 history note.)

***Long Term Housing.*** Housing intended for occupancy by a person or persons for 32 consecutive days or longer.

***Lot.*** A parcel of land under one ownership that constitutes, or is to constitute, a complete and separate functional unit of development, and that does not extend beyond the property lines along streets or alleys. A lot as so defined generally consists of a single Assessor's lot, but in some cases consists of a combination of contiguous Assessor's lots or portions thereof where such combination is necessary to meet the requirements of this Code. In order to clarify the status of specific property as a lot under this Code, the Zoning Administrator may, consistent with the provisions of this Code, require such changes in the Assessor's records, placing of restrictions on the land records, and other actions as may be necessary to assure compliance with this Code. The definition of "lot" shall also be applicable to piers under the jurisdiction of the Port Commission.

***Lot, Corner.*** A lot bounded on two or more adjoining sides by streets that intersect adjacent to such lot, provided that the angle of intersection of such streets along such lot does not exceed 135 degrees. For the purposes of this Code, no Corner Lot shall be considered wider or deeper than 125 feet, and the remainder of any lot involved shall be considered to be an Interior Lot. Whenever a Corner Lot is resubdivided, only that portion which thereafter is bounded on adjoining sides by streets as herein described shall be a Corner Lot.

***Lot, Interior.*** A lot other than a Corner Lot.

***Lot Size (Per Development).*** The permitted gross lot area for new construction or expansion of existing development.

## M

***Mandatory Discretionary Review.*** A hearing before the Planning Commission that is required by the Planning Code at which the Commission will determine whether to approve, modify, or disapprove a permit application.

***Manufacturing 1, Heavy.*** An Industrial Use having the potential of creating substantial noise, smoke, dust, vibration, and/or other environmental impacts or pollution, and including, but not limited to:

(a) Concrete mixing, concrete products manufacture,

(b) Electric foundry or foundry for nonferrous metals

(c) Enameling, lacquering, wholesale paint mixing from previously prepared pigments and vehicles,

(d) Woodworking mill, manufacture of woodfibre, sawdust or excelsior products not involving chemical processing,

(e) Blast furnace, rolling mill, or smelter; and

(f) Ice manufacturing plant.

This use is subject to the location and operation controls in Section 202.2(d)

***Manufacturing 2, Heavy.*** An Industrial Use having the potential of creating substantial noise, smoke, dust, vibration, and/or other environmental impacts or pollution, and including, but not limited to:

(a) Production or refining of petroleum products, excluding such products used solely as fuel sources;

(b) Rendering or reduction of fat, bones, or other animal material, where adequate provision is made for the control of odors through the use of surface condensers and direct-flame afterburners or equivalent equipment;

(c) Incineration of garbage, refuse, dead animals or parts thereof;

This use is subject to the controls in Section 202.2(d).

(Amended by Ord. 217-21; see Sec. 102 history note.)

***Manufacturing 3, Heavy.*** An Industrial Use having the potential of creating substantial noise, smoke, dust, vibration, and/or other environmental impacts or pollution, and including, but not limited to:

(a) Battery manufacture;

(b) Manufacture of corrosive acid or alkali, cement, gypsum, lime, plaster of Paris, explosive, fertilizer, glue or gelatin from fish or animal refuse;

(c) Manufacture, refining, distillation, or treatment of any of the following: abrasives, acid (noncorrosive), alcohol, ammonia, asbestos, asphalt, bleaching powder, candles (from tallow), celluloid, chlorine, coal, coke, creosote, dextrine, disinfectant, dye, enamel, gas carbon or lampblack, gas (acetylene or other inflammable), glucose, insecticide, lacquer, linoleum, matches, oilcloth, oil paint, paper (or pulp), petroleum products (excluding such products used solely as fuel sources), perfume, plastics, poison, potash, printing ink, refuse mash or refuse grain, rubber (including balata or gutta-percha or crude or scrap rubber), shellac, shoe or stove polish, soap, starch, tar, turpentine, or varnish.

(d) Foundry, structural iron or pipe works, boilermaking where riveting is involved, locomotive works, roundhouse or railroad shop.

This use is subject to the location and operation controls in Section 202.2(d)

(Amended by Ord. 217-21; see Sec. 102 history note.)

***Manufacturing, Light.*** An Industrial Use that provides for the fabrication or production of goods, by hand or machinery, for distribution to retailers or wholesalers for resale off the premises, primarily involving the assembly, packaging, repairing, or processing of previously prepared materials. Light manufacturing uses include production and custom activities usually involving individual or special design, or handiwork, such as the following fabrication or production activities, as may be defined by the Standard Industrial Classification Code Manual as light manufacturing uses:

(a) Food processing;

(b) Apparel and other garment products;

(c) Furniture and fixtures;

(d) Printing and publishing of books or newspapers;

(e) Leather products;

(f) Pottery;

(g) Glass-blowing;

(h) Commercial laundry, rug cleaning, and dry cleaning facility;

(i) Measuring, analyzing, and controlling instruments; photographic, medical, and optical goods; watches and clocks; or

(j) Manufacture of cannabis products or cannabis extracts that are derived without the use of volatile organic compounds (any use requiring License Type 6—Manufacturer 1, as defined in California Business and Professions Code, Division 10).

It shall not include Trade Shop, Agricultural and Beverage Processing 1 or 2, or Heavy Manufacturing 1, 2, or 3. This use is subject to the location and operation controls in Section 202.2(d).

(Amended by Ord. 229-17; Ord. 111-21; see Sec. 102 history note.)

***Maritime Use.*** A Use Characteristic defined as any use that requires access to or use of San Francisco Bay waters in order to function or operate in the normal course of business including, but not limited to, uses associated with waterborne commerce, navigation, fisheries, and recreation, and industrial, commercial, and other operations directly related to the conduct of waterborne commerce, navigation, fisheries, or recreation on property subject to public trust. Maritime Uses also includes houseboats or residential uses on the water.

***Marquee.*** A permanent roofed structure attached to and supported entirely by a building, including any object or decoration attached to or part of said marquee, no part of which shall be used for occupancy or storage, with the purpose of providing protection from sun and rain and/or embellishment of the façade, as further regulated in Section 3106 of the Building Code.

***Massage, Chair/Foot.*** A Retail Sales and Service Use where the only massage service provided is chair or foot massage, such service is visible to the public, and customers are fully clothed at all times.

***Massage Establishment.*** A Retail Sales and Service Use defined by Section 29.5 of the Health Code. For purposes of the Planning Code only, "Massage Establishment" shall include a "Massage Establishment" but shall not include a "Sole Practitioner Massage Establishment," as these terms are defined in Section 29.5 of the Health Code. The Massage Establishment shall first obtain a permit from the Department of Public Health pursuant to Section 29.25 of the Health Code, or a letter from the Director of the Department of Public Health certifying that the establishment is exempt from such a permit under Section 29.25 of the Health Code

(Amended by Ord. 73-15; Ord. 63-20; Ord. 233-21; Ord. 37-22; see Sec. 102 history note.)

***Medical Cannabis Dispensary.*** An Institutional Healthcare Use that is either (a) a cooperative or collective operating under the authority of a permit issued by the Director of Health under Article 33 of the Health Code, or (b) a Medicinal Cannabis Retailer as defined in Police Code Section 1602. A Medical Cannabis Dispensary Use is permitted only if it meets the conditions listed in Section 202.2(e).

(Amended by Ord. 229-17; see Sec. 102 history note.)

***Metal Working.*** An Industrial use that includes metal working or blacksmith shop; excluding presses of over 20 tons' capacity and machine-operated drop hammers. This use is subject to location and operational controls in Section 202.2(d).

***Mobile Food Facility.*** Any vehicle or pushcart used in conjunction with a commissary or other permanent food facility upon which food is sold or distributed at retail prices. Mobile Food Facility does not include a "Transporter" used to transport packaged food from a food facility or other approved source to the consumer. A Mobile Food Facility does not include any use that sells goods, wares, or merchandise other than food or drink intended for human consumption. For the purposes of the Planning Code, a Mobile Food Facility that is a temporary Use is regulated as an intermittent activity, per Section 205.4; a Mobile Food Facility that exceeds the limitations set forth in Section 205.4 is considered a Restaurant or Limited Restaurant Use, as defined in this Section 102, and is regulated as such by the Use controls for the respective zoning district. Mobile Food Facilities shall comply with the good neighbor policies set forth in Public Works Code Section 184.94 as well as Planning Code Section 202.2(a)(1).

(Amended by Ord. 129-17; see Sec. 102 history note.)

***MOH.*** The Mayor's Office of Housing and Community Development or its successor.

***Mortuary.*** A Retail Sales and Services Use that provides funeral services, funeral preparation, or burial arrangements, including retail establishments that predominantly sell or offer for sale caskets, tombstones, or other funerary goods. In RH, RM, RTO, and RC Districts only, this use includes Columbarium use, which provides for the storage of cremated remains in niches.

***Motel.*** A Retail Sales and Services Use that includes an auto court, motor lodge, tourist court, or other facility similarly identified, contains rooms or suites of rooms, none with individual cooking facilities, which are offered for compensation and are primarily for the accommodation of transient guests traveling by automobile, and where each sleeping unit is independently accessible from the outside. This use is subject to the controls listed in Section 202.2(a).

***Movie Theater.*** A Retail Entertainment, Arts and Recreation Use that displays motion pictures, videos, slides, or closed-circuit television pictures. This use does not include an adult theater, which is regulated as an Adult Business. Removal of a Movie Theater is subject to the controls in Section 202.4.

***MTA.*** The Municipal Transportation Agency or its successor.

***MTA Director.*** The Director of MTA or his or her designee.

***Municipal Railway (Muni).*** The public transit system owned by the City and under the jurisdiction of the MTA.

## N

***Neighborhood Agriculture.*** See Agriculture, Neighborhood.

***Neighborhood-Serving Business.*** A neighborhood-serving business cannot be defined by the type of use, but rather by the characteristics of its customers, types of merchandise or service, its size, trade area, and the number of similar establishments in other neighborhoods. The primary clientele of a "neighborhood-serving business," by definition, is comprised of customers who live and/or work nearby.

While a neighborhood-serving business may derive revenue from customers outside the immediately surrounding neighborhood, it is not dependent on out-of-neighborhood clientele.

A neighborhood-serving use provides goods and/or services which are needed by residents and workers in the immediate neighborhood to satisfy basic personal and household needs on a frequent and recurring basis, and which if not available require trips outside of the neighborhood.

A use may be more or less neighborhood-serving depending upon its trade area. Uses that, due to the nature of their products and service, tend to be more neighborhood-serving are those which sell convenience items such as groceries, personal toiletries, magazines, and personal services such as cleaners, laundromats, and film processing. Uses that tend to be less neighborhood-oriented are those which sell more specialized, more expensive, less frequently purchased comparison goods such as automobiles and furniture.

For many uses (such as stores selling apparel, household goods, and variety merchandise), whether a business is neighborhood-serving depends on the size of the establishment: the larger the use, the larger the trade area, hence the less neighborhood-oriented.

Whether a business is neighborhood-serving or not also depends in part on the number and availability of other similar establishments in other neighborhoods: the more widespread the use, the more likely that it is neighborhood-oriented.

***Net Addition.*** The total amount of gross floor area defined in Planning Code Section 102 contained in a development project, less the gross floor area contained in any structure demolished or retained as part of the proposed development project.

***Nighttime Entertainment.*** See Entertainment, Nighttime.

***Non-Auto Vehicle Sales or Rental.*** A Retail Sales and Service Use offering new or used bicycles, scooters, motorcycles, boats, or other marine vehicles for sale, rent, or lease when conducted entirely within an enclosed building.

***Non-Commercial Entertainment and Recreation.*** See Entertainment and Recreation, Non-Commercial.

***Nonprofit Organization.*** An organization organized and operated for nonprofit purposes within the provisions of California Revenue and Taxation Code Sections 23701-23710, inclusive, as demonstrated by a written determination from the California Franchise Tax Board exempting the organization from taxes under Revenue and Taxation Code Section 23701.

***Non-Residential Use.*** Space within any structure or portion thereof intended or primarily suitable for, or accessory to, occupancy by retail, office, commercial, or uses other than a Residential Use as defined in this Section. For the purposes of Article 4, residential components of Institutional Uses other than Religious Institutions shall be defined as a "residential use," and non-residential use shall not include PDR and publicly owned and operated community facilities.

***Non-Residential Use Size.*** The permitted gross floor area allowed each individual non-residential use. Gross Floor Area is defined in this Section of the Code.

***Non-Retail Use.*** A type of Commercial Use that involves the sale of goods or services to other businesses rather than the end user, or that does not provide for direct sales to the general public on site. Uses in this category include, but are not limited to, Non-Retail Sales and Service Uses and Non-Retail Automotive Uses.

***Notice of Special Restrictions.*** A document recorded with the San Francisco Recorder’s Office detailing specific restrictions placed on an Assessor’s lot that are typically associated with an approval action by the Planning Department, Planning Commission, Zoning Administrator, or other City agency.

(Amended by Ord. 202-18; see Sec. 102 history note.)

## O

***Occupied Floor Area.*** See Floor Area, Occupied.

***Office, General.*** A Non-Retail Sales and Service Use that includes space within a structure or portion thereof intended or primarily suitable for occupancy by persons or entities which perform, provide for their own benefit, or provide to others at that location, services including, but not limited to, the following: professional, banking, insurance, management, consulting, technical, sales, and design; and the non-accessory office functions of manufacturing and warehousing businesses, multimedia, software development, web design, electronic commerce, and information technology. This use shall exclude Non-Retail Professional Services as well as Retail Uses; repair; any business characterized by the physical transfer of tangible goods to customers on the premises; wholesale shipping, receiving and storage; and design showrooms or any other space intended and primarily suitable for display of goods.

***Office Use.*** A grouping of uses that includes General Office, Retail Professional Services, and Non-Retail Professional Services. This use shall exclude: retail uses other than Retail Professional Services; repair; any business characterized by the physical transfer of tangible goods to customers on the premises; wholesale shipping, receiving and storage; and design showrooms or any other space intended and primarily suitable for display of goods.

(Amended by Ord. 249-23, see Sec. 102 history note.)

***One Ownership.*** Ownership of a parcel or contiguous parcels of property or possession thereof under a contract to purchase by a person or persons, firm, corporation or partnership, individually, jointly, in common, or in any other manner whereby such property is under single or unified control. The term shall include condominium ownership. The term "owner" shall mean the person, firm, corporation or partnership exercising one ownership as herein defined.

***Open Air Sales.*** A Commercial Use Characteristic generally categorized as a Retail Sales and Service Use that involves open air sale of new and/or used merchandise, except vehicles, but including agricultural products, plants and gardening supplies, building materials, crafts, and/or art work.

(Amended by Ord. 182-19, see Sec. 102 history note.)

***Open Recreation Area.*** A Non-Commercial Entertainment, Arts and Recreation Use that is not publicly owned which is not screened from public view, has no structures other than those necessary and incidental to the open land use, is not operated as a gainful business, and is devoted to outdoor recreation such as golf, tennis, or riding.

***Open Space, Required.*** Any front setbacks, side or rear yards, courts, usable open space or other open area provided in order to meet the requirements of this Code.

***Open Use.*** Any use of a lot that is not conducted within a Building.

***Ornamental Fencing.*** A decorative metal fence made of wrought iron or fencing that gives the appearance of wrought-iron fencing, but expressly excludes plastic-based materials, barbed wire, similar non-decorative fences as well as traditional chain-link or woven wire fences. Chain-link or woven wire fences may be used if the fencing visible from the public right-of-way is bordered by rails on the top and bottom and has well-built columns that are at least 8 inches wide and are topped with caps. The columns shall be spaced no more than 8 feet apart.

***Outdoor Activity Area.*** A Commercial Use characteristic defined as an area associated with a legally established use, not including primary circulation space or any public street, located outside of a building or in a courtyard, which is provided for the use or convenience of patrons of a commercial establishment including, but not limited to, sitting, eating, drinking, dancing, and food-service activities.

## P

***Parcel Delivery Service.*** See Service, Parcel Delivery.

***Parking Garage, Private.*** A Non-Retail Automotive Use that provides temporary parking accommodations for automobiles, trucks, vans, bicycles, or motorcycles in a garage not open to the general public, without parking of recreational vehicles, mobile homes, boats, or other vehicles, or storage of vehicles, goods, or equipment. Provisions regulating automobile parking are set forth in Sections 155, 156, 303(t) or (u) and other provisions of Article 1.5 of this Code.

(Amended by Ord. 99-17; see Sec. 102 history note.)

***Parking Garage, Public.*** A Retail Automotive Use that provides temporary parking accommodations for automobiles, trucks, vans, bicycles, or motorcycles in a garage open to the general public, without parking of recreational vehicles, mobile homes, boats, or other vehicles, or storage of vehicles, goods, or equipment. Provisions regulating automobile parking are set forth in Sections 155, 156, 303(t) or (u) and other provisions of Article 1.5 of this Code.

(Amended by Ord. 99-17; see Sec. 102 history note.)

***Parking Lot, Private.*** A Non-Retail Automotive Use that provides temporary off-street parking accommodations for private automobiles, trucks, vans, bicycles, or motorcycles on an open lot or lot surrounded by a fence or wall not open to the general public, without parking of recreational vehicles, motor homes, boats, or other vehicles, or storage of vehicles, goods, or equipment. Provisions regulating automobile parking are set forth in Sections 155, 156, 303(t) or (u) and other provisions of Article 1.5 of this Code.

(Amended by Ord. 99-17; see Sec. 102 history note.)

***Parking Lot, Public.*** A Retail Automotive Use that provides temporary parking accommodations for private automobiles, trucks, vans, bicycles, or motorcycles on an open lot or lot surrounded by a fence or wall open to the general public, without parking of recreational vehicles, motor homes, boats, or other vehicles, or storage of vehicles, goods, or equipment. Provisions regulating automobile parking are set forth in Sections 155, 156, 303(t) or (u) and other provisions of Article 1.5 of this Code.

(Amended by Ord. 99-17; see Sec. 102 history note.)

***Passive Outdoor Recreation.*** A Non-Commercial Entertainment, Arts and Recreation Use defined as an open space used for passive recreational purposes that is not publicly owned and is not screened from public view, has no structures other than those necessary and incidental to the open land use, is not served by vehicles other than normal maintenance equipment, and has no retail or wholesale sales on the premises. Such open space may include, but not necessarily be limited to, a park, playground, or rest area.

***PDR Use.*** See Production, Distribution, and Repair Use.

***Permeable Surface.*** Permeable Surfaces are those that allow water to infiltrate the underlying soils. Permeable Surfaces shall include, but not be limited to, vegetative planting beds, porous asphalt, porous concrete, single-sized aggregate, open-jointed blocks, stone, pavers, or brick that are loose-set and without mortar. Permeable Surfaces are required to be contained so neither sediment nor the permeable surface material discharges off the site.

(Amended by Ord. 202-18; see Sec. 102 history note.)

***Pharmacy.*** A Retail Sales and Service Use in which the profession of pharmacy is practiced and where prescriptions are compounded

and offered for sale. This Section shall not be construed to limit any qualifying pharmacy from offering other retail goods in addition to prescription pharmaceuticals. Pharmacies are subject to controls in Section 202.2(a).

***Philanthropic Facility.*** See Social Service or Philanthropic Facility.

***Plan Dimensions.*** The linear horizontal dimensions of a building or structure, at a given level, between the outside surfaces of its exterior walls. The "length" of a building or structure is the greatest plan dimension parallel to an exterior wall or walls and is equivalent to the horizontal dimension of the corresponding elevation of the building or structure at that level. The "diagonal dimension" of a building or structure is the plan dimension between the two most separated points on the exterior walls.

***Planning Commission (Commission).*** The San Francisco Planning Commission.

***Planning Department (Department).*** The San Francisco Planning Department. For purposes of Article 4, may include the Planning Department's designee, including the Mayor's Office of Housing and other City agencies or departments.

***Post-Secondary Educational Institution.*** An Institutional Education Use, public or private, that is certified by the Western Association of Schools and Colleges, provides educational services such as a college or university, and has met the applicable provisions of Section 304.5 of this Code concerning institutional master plans. Such institution may include employee or student dormitories and other housing operated by and affiliated with the institution. Such institution shall not have industrial arts as its primary course of study.

***Power Plant.*** A Industrial Use defined as a steam, fossil-fuel, or any other type of thermal power plant. A Power Plant shall mean each individual power generation unit capable of independent operation, but shall not include on-site power generation units less than ten megawatts in size. Intensification of a Power Plant use requires Conditional Use authorization per Section 178(c), and is subject to the controls in Section 202.2(d).

***Principal Façades.*** See Façades, Principal.

***Principal (or Principally Permitted) Use.*** A Use permitted as of right in each established district where listed for that class of district in Articles 2, 7, 8, or 9 and as regulated in this Code. Principally permitted uses may be required to comply with the Operating Conditions of Section 202.2.

(Added by Ord. 129-17; see Sec. 102 history note.)

***Production, Distribution, and Repair (PDR) Use.*** A grouping of uses that includes, but is not limited, to all Industrial and Agricultural Uses, Ambulance Services, Animal Hospital, Automotive Service Station, Automotive Repair, Automotive Wash, Arts Activities, Business Services, Catering, Commercial Storage, Kennel, Motor Vehicle Tow Service, Livery Stable, Parcel Delivery Service, Public Utilities Yard, Storage Yard, Trade Office, Trade Shop, Wholesale Sales, and Wholesale Storage.

(Amended by Ord. 202-18; Ord. 111-21; see Sec. 102 history note.)

***Public Facility.*** An Institutional Use that consists of publicly or privately owned use that provides public services to the community, whether conducted within a building or on an open lot, and which has operating requirements that necessitate location within the district and is in compliance with the General Plan, including civic structures (such as museums, post offices, administrative offices of government agencies), public libraries, police stations, and transportation facilities. Such use shall not include service yards, machine shops, garages, incinerators, Utility Installations, and publicly operated parking in a garage or lot (Public Automobile Parking Garages and Public Parking Lots).

(Amended by Ord. 202-18; see Sec. 102 history note.)

***Public Transportation Facility.*** A Utility and Infrastructure Use involving passenger terminal facilities for mass transportation of a single or combined modes including, but not limited to, aircraft, ferries, fixed-rail vehicles and buses, whether public or privately owned or operated, when in conformity with the General Plan. In Districts where such uses are permitted, conditional use authorization shall be required if the facility is: (a) an Automotive Use, as defined in this Section; and (b) other than a boarding platform, bus stop, transit shelter, or similar ancillary feature of a transit system; or(c) a landing field for aircraft.

***Public Utilities Yard.*** A Utility and Infrastructure Use that is defined as a service yard for public utility, or public use of a similar character, if conducted entirely within an area completely enclosed by a wall or concealing fence not less than six feet high.

## Q

None.

## R

***Rear Façade.*** See Façade, Rear.

***Recreation.*** See Entertainment and Recreation Use.

***Religious Institution.*** An Institutional Community Use with a tax-exempt status as a religious institution granted by the United States Government and that is used primarily for collective worship or ritual or observance of common religious beliefs. Such institution may include, on the same lot, the housing of persons who engage in supportive activity for the institution.

***Replacement of Use.*** The total amount of Gross Floor Area, as defined in Section 102 of this Code, to be demolished and reconstructed by a development project.

***Reproductive Health Clinic.*** A Retail Sales and Service Use that is a clinic licensed pursuant to applicable provisions of the California Health and Safety Code that meets both of the following requirements: a) provides directly to patients medical services consisting of Abortions or Emergency Contraception as those terms are defined in Administrative Code Section 93.3; and b) primarily specializes in

reproductive health services as defined in California Penal Code 423.1. A Reproductive Health Clinic that meets the foregoing requirements may also provide additional medical and allied health services by physicians or other healthcare professionals.

(Added by Proposition O, 11/5/2024; see Sec. 102 history note.)

***Required Open Space.*** See Open Space, Required.

***Residential Building.*** Any structure containing one or more Residential Units as a principal use, regardless of any other uses present in the building.

***Residential Care Facility.*** An Institutional Healthcare Use providing lodging, board and care for a period of 24 hours or more to persons in need of specialized aid by personnel licensed by the State of California. Such facility shall display nothing on or near the facility that gives an outward indication of the nature of the occupancy except for a sign as permitted by Article 6 of this Code, shall not provide outpatient services, and shall be located in a structure which remains residential in character. Such facilities shall include, but not necessarily be limited to, a board and care home, family care home, long-term nursery, orphanage, rest home or home for the treatment of addictive, contagious or other diseases, or psychological disorders.

***Residential Hotel.*** See Hotel, Residential.

***Residential Unit.*** A legal conforming or non-conforming Dwelling Unit or a legal non-conforming Live/Work Unit

***Residential Use.*** A Use Category consisting of uses that provide housing for San Francisco residents, rather than visitors, including Dwelling Units, Group Housing, Residential Hotels, Senior Housing, Homeless Shelters, and for the purposes of Article 4 only any residential components of Institutional Uses. Single Room Occupancy, Intermediate Length Occupancy, and Student Housing designations are considered characteristics of certain Residential Uses.

(Amended by Ord. 129-17; Ord. 63-20; Ord. 78-20; see Sec. 102 history note.)

***Retail Workspace.*** A Retail Sales and Service Use open to the general public that provides space to work that is made available on a daily or hourly basis. Such use is only permitted as a principal use in conjunction with the concurrent operation of a principally or conditionally permitted Eating and Drinking Use, which Eating and Drinking Use shall (a) occupy no less than one-third of the gross floor area of the premises and (b) face the street. A Retail Workspace may provide services to the business community along with services to the general public. If the Retail Workspace exclusively provides services to the business community, it shall be considered a General Office Use as defined in the Planning Code.

(Added by Proposition H, 11/3/2020; see Sec. 102 history note.)

***Restaurant.*** A Retail Sales and Service use that serves prepared, ready-to-eat cooked foods to customers for consumption on the premises and which has seating. As a minor and incidental use, it may serve such foods to customers for off-site consumption. It may provide on-site beer, wine, and/or liquor sales for drinking on the premises (with ABC license types 02, 23, 41, 47, 49, 59, 75, or 87); however, if it does so, it shall be required to operate as a Bona Fide Eating Place. It is distinct and separate from a Limited-Restaurant. Such businesses shall operate with the specified conditions in Section 202.2(a)(1).

It shall not be required to operate within an enclosed building so long as it is also a Mobile Food Facility. Any associated outdoor seating and/or dining area is subject to regulation as an Outdoor Activity Area as set forth elsewhere in this Code.

(Amended by Ord. 188-15; 129-17; Ord. 205-19; see Sec. 102 history note.)

***Restaurant, Limited.*** A Retail Sales and Service Use that serves ready-to-eat foods and/or drinks to customers for consumption on or off the premises, that may or may not have seating. It may include wholesaling, manufacturing, or processing of foods, goods, or commodities on the premises as an Accessory Use as set forth in Sections 204.3 or 703(d), 803.2(d), 803.3(b)(1)(C) and 825(c)(1)(C) depending on the zoning district in which it is located. It includes, but is not limited to, foods provided by sandwich shops, coffee houses, pizzerias, ice cream shops, bakeries, delicatessens, and confectioneries meeting the above characteristics, but is distinct from a Specialty Grocery, Restaurant, and Bar. Within the North Beach SUD, it is also distinct from Specialty Food Manufacturing, as defined in Section 780.3(b). It shall not provide on-site beer and/or wine sales for consumption on the premises, but may sell beer and/or wine for consumption off the premises with a California Alcoholic Beverage Control Board License type 20 (off-sale beer and wine), if all areas devoted to the display and sale of alcoholic beverages occupy less than 15% of the Occupied Floor Area of the establishment. Such businesses shall operate with the specified conditions in Section 202.2(a)(1).

(Amended by Ord. 129-17; Ord. 202-18; Ord. 285-18; Ord. 63-20; see Sec. 102 history note.)

***Retail Entertainment, Arts and Recreation.*** See Entertainment, Arts and Recreation, Retail.

***Retail Sales and Service, General.*** A Retail Sales and Service Use that provides goods and/or services to the general public and that is not listed as a separate Retail Sales and Service Use in this Section 102. This use includes, but is not limited to the sale or provision of the following goods and services:

(a) Personal items such as tobacco and magazines;

(b) Household goods and service (including paint, fixtures, and hardware, but excluding other building materials);

(c) Variety merchandise, pet supply stores, and pet grooming services;

(d) Florists and plant stores;

(e) Apparel and accessories;

(f) Antiques, art galleries, art supplies, and framing service;

(g) Home furnishings, furniture, and appliances;

(h) Books, stationery, greeting cards, office supplies, copying service, music, and sporting goods; and

(i) Toys, gifts, and photographic goods and services.

(Amended by Ord. 129-17; Ord. 285-18; Ord. 111-21; Ord. 209-21; see Sec. 102 history note.)

***Retail Use.*** A Commercial Use that includes uses that involve the sale of goods, typically in small quantities, or services directly to the ultimate consumer or end user including, but not limited to, Retail Sales and Service Uses, some Entertainment, Arts and Recreation Uses, and Retail Automotive Uses.

(Amended by Ord. 129-17; see Sec. 102 history note.)

## S

***Sales and Services, Non-Retail.*** A Commercial Use category that includes Uses that involve the sale of goods or services to other businesses rather than the end user, or that does not provide for direct sales to the consumer on site. Uses in this category include, but are not limited to: Business Services, Catering, Commercial Storage, Design Professional, General Office, Laboratory, Life Science, Non-Retail Professional Service, Trade Office, Wholesale Sales, and Wholesale Storage.

(Amended by Ord. 129-17; Ord. 249-23; see Sec. 102 history note.)

***Sales and Services, Retail.*** A Commercial Use category that includes Uses that involve the sale of goods, typically in small quantities, or services directly to the ultimate consumer or end user with some space for retail service on site, excluding Retail Entertainment Arts and Recreation, and Retail Automobile Uses and including, but not limited to: Adult Business, Animal Hospital, Bar, Cannabis Retail, Chair and Foot Massage, Tourist Oriented Gift Store, General Grocery, Specialty Grocery, Gym, Hotel, Jewelry Store, Kennel, Laundromat, Liquor Store, Massage Establishment, Mortuary (Columbarium), Motel, Non-Auto Sales, Pharmacy, Restaurant, Limited Restaurant, General Retail Sales and Service, Financial Service, Fringe Financial Service, Limited Financial Service, Health Service, Personal Service, Retail Professional Service, Self-Storage, Tobacco Paraphernalia Establishment, and Trade Shop.

(Amended by Ord. 188-15; Ord. 129-17; Ord. 229-17; Ord. 111-21; Ord. 209-21; Ord. 249-23; see Sec. 102 history note.)

***San Francisco.*** The City and County of San Francisco.

***School.*** An Institution Educational Use, public or private, certified by the Western Association of Schools and Colleges that provides educational instruction to students in kindergarten through twelfth grade. Such institution may include employee or student dormitories and other housing operated by and affiliated with the institution. This use is distinct and separate from a Post-Secondary Educational Institution, which is defined under this Section of the Code.

***Senior Housing.*** A Residential Use defined as dwellings that are specifically designed for and occupied by senior citizens. Senior Housing is subject to the conditions listed in Section 202.2(f).

(Amended by Ord. 63-20; see Sec. 102 history note.)

***Service, Ambulance.*** A Non-Retail Automotive Use that provides medically related transportation services.

***Service, Business.*** A Non-Retail Sales and Service Use that provides the following kinds of services primarily to businesses and/or to the general public and does not fall under the definition of Office: radio and television stations, newspaper bureaus, magazine and trade publication publishing, microfilm recording, slide duplicating, bulk mail services, parcel shipping services, parcel labeling and packaging services, messenger delivery/courier services, sign painting and lettering services, non-vehicular equipment rental, or building maintenance services.

(Amended by Ord. 188-15; Ord. 129-17; Ord. 229-17; Ord. 111-21; see Sec. 102 history note.)

***Service, Financial.*** A Retail Sales and Service Use that provides banking services and products to the public, such as banks, savings and loans, and credit unions, when occupying more than 15 feet of linear frontage or 200 square feet of gross floor area. Any applicant for a financial service use shall provide the Planning Department with a true copy of the license issued to it by the State of California.

***Service, Fringe Financial.*** A Retail Sales and Service Use that provides banking services and products to the public and is owned or operated by a "check casher" as defined in California Civil Code Section 1789.31, as amended from time to time, or by a "licensee" as defined in California Financial Code Section 23001(d), as amended from time to time. Any applicant for a fringe financial service use shall provide the Department with a true copy of the license issued to it by the State of California. A Nonprofit Fringe Financial Service shall mean a Fringe Financial Service that is exempted from payment of income tax under Section 23701(d) of the California Revenue and Taxation Code and Section 501(c)(3) of the Internal Revenue Code of the United States. Any such Nonprofit Fringe Financial Service shall provide the Planning Department with a true copy(ies) of its income tax documentation demonstrating its exemption from payment of income tax under State and Federal Law. A new Fringe Financial Service, with the exception of a Nonprofit Fringe Financial Service, shall not locate within one-quarter mile of an existing Fringe Financial Service.

***Service, Health.*** A Retail Sales and Service Use that provides medical and allied health services to the individual by physicians, surgeons, dentists, podiatrists, psychologists, psychiatrists, acupuncturists, chiropractors, Sole Practitioner massage therapists as defined in Section 29.5 of the Health Code, or any other health-care professionals when licensed by a State-sanctioned Board overseeing the provision of medically oriented services. It includes, without limitation, a clinic, primarily providing outpatient care in medical, psychiatric, or other health services, and not part of a Hospital or medical center, as defined by this Section of the Code, and Sole Practitioner Massage Establishments as defined in Section 29.5 of the Health Code, but does not include other Massage Establishments, which are defined elsewhere in this Code. Health Service does not include Reproductive Health Clinic, which is defined separately in this Section 102.

(Amended by Ord. 73-15; Ord. 233-21; Ord. 37-22; Proposition O, 11/5/2024; see Sec. 102 history note.)

***Service, Limited Financial.*** A Retail Sales and Service Use that provides banking services, when not occupying more than 15 feet of linear frontage or 200 square feet of gross floor area. Automated teller machines, if installed within such a facility or on an exterior wall as a walk-up facility, are included in this category; however, these machines are not subject to the hours of operation, as defined in this Section of the Code and as set forth in the respective zoning district. Any applicant for a limited financial service use shall provide the Planning Department with a true copy of the license issued to it by the State of California.

***Service, Motor Vehicle Tow.*** A Non-Retail Automotive Use that provides vehicle towing service, including accessory vehicle storage, when all tow trucks used and vehicles towed by the use are parked or stored on the premises.

***Service, Non-Retail Professional.*** A Non-Retail Sales and Service Office Use that provides professional services primarily to other businesses including, but not limited to, accounting, legal, consulting, insurance, real estate brokerage, advertising agencies, public relations agencies, computer and data processing services, employment agencies, management consultants and other similar consultants, telephone message services, and travel services. This use may also provide services to the general public but is not required to. This use shall not include research services of an industrial or scientific nature in a commercial or medical laboratory, other than routine medical testing and analysis by a health-care professional or hospital.

(Amended by Ord. 63-20; Ord. 249-23; see Sec. 102 history note.)

***Service, Parcel Delivery.*** A Non-Retail Automotive Use limited to facilities for the unloading, sorting, and reloading of local retail merchandise for deliveries, including but not limited to cannabis and cannabis products, where the operation is conducted entirely within a completely enclosed building, including garage facilities for local delivery trucks, but excluding repair shop facilities. Within PDR Districts, this use is not required to be operated within a completely enclosed building. Parcel Delivery Service for merchandise or products other than cannabis and cannabis products is not allowed as an accessory use to any other principal use.

(Amended by Ord. 229-17; Ord. 47-24; Ord. 54-24; Ord. 113-24; see Sec. 102 history note.)

***Service, Personal.*** A Retail Sales and Services Use that provides grooming services to the individual, including salons, cosmetic services, tattoo parlors, and health spas, bathhouses, and steam rooms. Personal Service does not include Massage Establishment or Gym, which are defined separately in this Section 102.

(Amended by Ord. 285-18; Ord. 111-21; see Sec. 102 history note.)

***Service, Retail Professional.*** A Retail Sales and Service Use that provides primarily to the general public, general business, or professional services including, but not limited to, management, clerical, accounting, legal, consulting, insurance, real estate brokerage, and travel services. It may provide services to the business community, provided that it also provides services to the general public. Otherwise, it shall be considered a Non-Retail Professional Service Use as defined in this Section 102.

This use does not include research service of an industrial or scientific nature in a commercial or medical laboratory, other than routine medical testing and analysis by a health-care professional or hospital.

(Amended by Ord. 285-18; Ord. 63-20; Ord. 249-23; see Sec. 102 history note.)

***Shipyard.*** An Industrial Use that includes the building and repairing of ships.

***Single Room Occupancy (SRO) Unit.*** A Residential Use characteristic, defined as a Dwelling Unit or Group Housing room consisting of no more than one occupied room with a maximum gross floor area of 350 square feet and meeting the Housing Code's minimum floor area standards. The unit may have a bathroom in addition to the occupied room. As a Dwelling Unit, it would have a cooking facility and bathroom. As a group housing room, it would share a kitchen with one or more other single room occupancy unit/s in the same building and may also share a bathroom. A single room occupancy building (or "SRO" building) is one that contains only SRO units and accessory living space.

***Small Enterprise Workspace (S.E.W.).*** An S.E.W. is a use comprised of discrete workspace units of limited size that are independently accessed from building common areas. S.E.W.'s are subject to the controls listed in Section 202.2(g).

***Social Service or Philanthropic Facility.*** An Institutional Community Use that provides programs and/or services of a charitable or public service nature, including but not limited to arts, education, financial or housing assistance, training, and advocacy. In addition to providing their services on site, such uses may also conduct their administrative activities on site as a Principal Use.

(Amended by Proposition H, 11/3/2020; see Sec. 102 history note.)

***SOMA.*** The area bounded by Market Street to the north, The Embarcadero to the east, King Street to the south, and South Van Ness and Division Streets to the west.

***Specialty Grocery.*** See Grocery, Specialty.

***Sports Stadium.*** A Retail Entertainment, Arts and Recreation Use that includes any open-air sports stadium or arena, if conducted on premises not less than 200 feet from any R District.

***SRO.*** Single Room Occupancy.

(Added by Ord. 188-15; see Sec. 102 history note.)

***Storage, Commercial.*** A Non-Retail Sales and Service Use defined as a facility that stores within an enclosed building: contractors' equipment, building materials, or goods or materials used by other businesses at other locations. This use shall not include the storage of waste, salvaged materials, automobiles, inflammable or highly combustible materials, and wholesale goods or commodities.

***Storage, Self.*** A Retail Sales and Service Use defined as a facility that stores, within an enclosed building, household and personal

goods.

***Storage, Volatile Materials.*** An Industrial Use defined as bulk storage of inflammable, highly combustible, or explosive materials.

***Storage, Wholesale.*** A Non-Retail Sales and Service Use defined as a facility that stores, within an enclosed building, wholesale merchandise that is not accessory to a Wholesale Sales use. This use includes cold storage facilities, but not storage of inflammables or hazardous materials, which is covered under Hazardous Materials Storage.

***Storage Yard.*** An Industrial Use involving the storage of building materials or lumber, stones or monuments, livestock feed, or contractors' equipment, if conducted within an area enclosed by a wall or concealing fence not less than six feet high. This use does not include Vehicle Storage or a Hazardous Waste Facility.

***Story.*** That portion of a building included between the upper surface of any floor and the upper surface of the floor next above, except that the topmost story shall be that portion of a building included between the upper surface of the topmost floor and the ceiling or roof above.

Any mezzanine, or intermediate level, shall be considered part of a story constituted by another floor provided it is an open and integral part of the story or room of which it is a portion. There shall be only one such mezzanine per story and it shall have a minimum glazed or unglazed opening of 50 percent on the interior side of the room or story and an area not exceeding one-third of the floor area of the story or room in which it is located. Any mezzanine not meeting these criteria shall be considered a separate story.

(a) ***First Story.*** The highest building story with a floor level that is not more than six feet above grade at the centerline of the frontage of the lot where grade is defined.

(1) ***Grade.*** For purposes of this definition, "grade" is the point of elevation of the finished surface of the ground, paving, or sidewalk at the property line located along primary frontage, i.e., any street frontage between two consecutive streets or alleys where the total street frontage is entirely within an NC District. If the lot has more than one property line or no property line located along primary frontage, the Zoning Administrator shall choose the property line facing a street or alley where the grade is defined. In such situations, the Zoning Administrator shall favor streets that serve as major transportation routes, major or secondary thoroughfares, and streets along which other commercial districts are located. When the property line is five feet or more from the building frontage, grade shall be taken at the surface of the ground, paving, or sidewalk along the building frontage.

(2) Provisions in Section 260 of this Code shall apply in defining the point of measurement at grade, where the building steps laterally in relation to the street used to define grade.

(b) ***Second Story.*** The story above the first story.

(c) ***Third Story and Above.*** The story or stories above the second story and below the ceiling of the topmost story of a building.

(d) ***Basement.*** Space located below the first story of a building when such space is of sufficient floor to ceiling height for legal occupancy.

***Street.*** A right-of-way, 30 feet or more in width, permanently dedicated to common and general use by the public, including any avenue, drive, boulevard, or similar way, but not including any freeway or highway without a general right of access for abutting properties.

***Structural Alterations.*** Any change in the supporting members of a Building, such as bearing walls, columns, beams, or girders.

***Structure.*** Anything constructed or erected that requires fixed location on the ground or attachment to something having fixed location on the ground.

***Student Housing.*** A Residential Use characteristic defined as a living space for students of accredited Post-Secondary Educational Institutions that may take the form of Dwelling Units, Group Housing, or SRO Units and is owned, operated, or otherwise controlled by an accredited Post-Secondary Educational Institution. Unless expressly provided for elsewhere in this Code, the use of Student Housing is permitted where the form of housing is permitted in the underlying Zoning District in which it is located. Student Housing may consist of all or part of a building, and Student Housing owned, operated, or controlled by more than one Post-Secondary Educational Institution may be located in one building.

(Amended by Ord. 63-20; see Sec. 102 history note.)

## T

***Temporary Cannabis Sales.*** A Temporary Use that sells or otherwise provides cannabis and cannabis-related products for adult use, and that may also include the sale or provision of cannabis for medicinal use. A Temporary Cannabis Sales Use may only be operated by the holder of a valid Medical Cannabis Dispensary Permit from the Department of Public Health. Any authorization for a Temporary Cannabis Sales Use shall expire on January 1, 2019, pursuant to Section 205.2.

(Added by Ord. 229-17; see Sec. 102 history note.)

***Tobacco Paraphernalia Establishment.*** A Retail Sales and Service Use where more than 10% of the square footage of Occupied Floor Area, as defined in Section 102, or more than 10 linear feet of display area projected to the floor, whichever is less, is dedicated to the sale, distribution, delivery, furnishing, or marketing of Tobacco Paraphernalia from one person to another. For purposes of Sections 249.5, 719, 723, and 744 of this Code, however, Tobacco Paraphernalia Establishments shall mean retail uses where any Tobacco Paraphernalia is sold, distributed, delivered, furnished, or marketed from one person to another. “Tobacco Paraphernalia” means paraphernalia, devices, or instruments that are designed or manufactured for the smoking, ingesting, inhaling, or otherwise introducing into the body of tobacco, products prepared from tobacco, or controlled substances as defined in California Health and Safety Code Sections 11054, *et seq.* “Tobacco Paraphernalia” does not include lighters, matches, cigarette holders, any device used to store or

preserve tobacco, tobacco, cigarettes, cigarette papers, cigars, or any other preparation of tobacco that is permitted by existing law. Cannabis Retail Uses as defined in Section 102, Temporary Cannabis Retail Uses as defined in Section 205.2, and Medical Cannabis Dispensary Uses as defined in Section 102 are not Tobacco Paraphernalia Establishments.

(Amended by Ord. 202-18; Ord. 142-23; Ord. 70-24; see Sec. 102 history note.)

***Trade Office.*** A Non-Retail Sales and Service Use that includes business offices of building, plumbing, electrical, painting, roofing, furnace, or pest control contractors, if no storage of equipment or items for wholesale use are located on site. It may also include incidental accessory storage of office supplies and samples if the storage of equipment and supplies does not occupy more than one-third of the total Gross Floor Area of the use. Such Trade Offices shall operate in a manner to reduce noise, vibration, and emissions impacts beyond the premises of the use. No processing of building materials, such as mixing of concrete or heating of asphalt shall be conducted on the premises. Parking, loading, and unloading of all vehicles used by the contractor shall be located entirely within the building containing the use.

(Amended by Ord. 70-23; see Sec. 102 history note.)

***Trade School.*** An Institutional Education Use, public or private, where industrial arts is the primary course of study. Such use is not required to submit an institutional master plan pursuant to Section 304.5 of this Code.

***Trade Shop.*** A Retail Sales and Service Use that provides custom-crafted goods and/or services for sale directly to the consumer, reserving some storefront space for display and retail service, subject to the conditions in Section 202.2. A trade shop includes, but is not limited to:

(a) Repair of personal apparel, accessories, household goods, appliances, furniture, and similar items, but excluding repair of motor vehicles and structures;

(b) Upholstery services;

(c) Carpentry;

(d) Printing of a minor processing nature, including multi-copy and blueprinting services and printing of pamphlets, brochures, resumes, and small reports, but excluding printing of books, magazines, or newspapers;

(e) Tailoring; and

(f) Other artisan craft uses, including fine arts uses. Arts Activities and Light Manufacturing shall be considered distinct from Trade Shops.

(Amended by Ord. 285-18; Ord. 111-21; see Sec. 102 history note.)

***Treasurer.*** The Treasurer for the City and County of San Francisco.

***Truck Terminal.*** An Industrial Use where trucks meet and transfer goods to each other for shipment to other places.

## U

***Urban Agriculture.*** See Agriculture, Urban.

***Use.*** The purpose for which land or a structure, or both, are legally designed, constructed, arranged, or intended, or for which they are legally occupied or maintained, let, or leased.

***Use Characteristic.*** A feature of a Use, related to its physical layout, location, design, access, or other characteristics. Use Characteristics may be regulated independently of a Use itself. Residential Use Characteristics include Single Room Occupancy, Intermediate Length Occupancy, and Student Housing. Commercial Use Characteristics include Drive-up Facility, Formula Retail, Hours of Operation, Maritime Use, Open Air Sales, Outdoor Activity, and Walk-Up Facility.

(Added by Ord. 129-17; amended by Ord. 78-20; see Sec. 102 history note.)

***Use Size (Non-Residential).*** See Non-Residential Use Size.

***Utility and Infrastructure.*** A Use Category that includes Community Recycling Center, Internet Service Exchange, Power Plant, Public Transportation Facility, Public Utilities Yard, Wireless Telecommunications Services (WTS) Facility, and Utility Installation.

(Amended by Ord. 166-16; Ord. 202-18; see Sec. 102 history note.)

***Utility Installation.*** A Utility and Infrastructure Use that includes, but is not necessarily limited to, water, gas, electric, transportation, or communications utilities, or public service facility, provided that operating requirements necessitate placement at this location. This use does not include Wireless Telecommunications Services Facilities, or Public Transportation Facilities, as defined in this Section of the Code.

(Amended by Ord. 166-16; see Sec. 102 history note.)

## V

***Variance.*** An authorization to deviate from the strict application of certain Planning Code requirements pursuant to Section 305 of this Code.

(Added by Ord. 129-17; see Sec. 102 history note.)

***Vehicle Storage Garage.*** A Retail Automotive Use that provides for the storage of buses, recreational vehicles, mobile homes, trailers, or boats and/or storage for more than 72 hours of other vehicles in an enclosed structure. It shall not include rooftop storage. A Vehicle

Storage Garage shall comply with the street frontage requirements of the district in which it is located.

***Vehicle Storage Lot.*** A Retail Automotive Use that provides for the storage of buses, recreational vehicles, mobile homes, trailers, or boats and/or storage for more than 72 hours of other vehicles on an open lot. It shall not include rooftop storage. Vehicle Storage Lots shall comply with the Screening and Greening requirements of Section 142.

***Vehicular Use Area.*** An area of a lot not located within any enclosed or partially enclosed structure and that is devoted to a use by or for motor vehicles including parking (accessory or non-accessory); and Automotive Uses that are not enclosed by a structure including, but not limited to, storage of automobiles, trucks or other vehicles; gasoline stations; car washes; motor vehicle repair shops; loading areas; and service areas. Vehicular use areas shall be subject to landscaping and screening requirements of Section 142(b).

## W

***Waiver Agreement.*** An agreement acceptable in form and substance to the City Attorney and the Planning Department under which the City agrees to waive all or a portion of the Community Improvements Impact Fee.

***Walk-Up Facility.*** A Use Characteristic defined as a structure designed for provision of pedestrian-oriented services when located on an exterior building wall, including window service, self-service operations, and automated bank teller machines (ATMs). Such facilities shall provide waste receptacles, and be kept free of litter.

(Amended by Ord. 70-23; see Sec. 102 history note.)

***Wholesale Sales.*** A Non-Retail Sales and Service Use that exclusively provides goods or commodities for resale or business use, including accessory storage. This use includes cannabis distribution (any use requiring License Type 11—Distributor, as defined in California Business and Professions Code, Division 10). It shall not include a nonaccessory storage warehouse.

(Amended by Ord. 229-17; see Sec. 102 history note.)

***Width of a Street or Alley.*** Unless specified elsewhere in this Code, the width of a street or alley shall be the distance measured along a line that is perpendicular to the centerline of that street or alley and extends from the mid-point of the front property line of a given parcel to a front property line on the opposite side of that street or alley.

***Wireless Telecommunications Services (WTS) Facility.*** A Utility and Infrastructure Use defined as a facility that sends and/or receives wireless radio frequency (RF) signals, AM/FM, microwave, or electromagnetic waves, for the purpose of providing voice, data, images or other information; including but not limited to digital (previously "cellular") mobile phone service, personal communication service and paging services. WTS Facilities may be located either inside or outside of an enclosed building.

Such facilities include, but are not limited to, directional (panel), omni-directional and parabolic antennas, related electronic equipment, power sources, screening elements, supporting equipment, towers and structures. The term does not include facilities exempt under the Federal Communications Commission's Over The Air Receiving Device rules. A WTS Facility is also referred to as a "Personal Wireless Services Facility," as defined in the Federal Communications Act.

A WTS Facility is subject to the Wireless Telecommunications Services Facility Siting Guidelines ("Guidelines") adopted by the Planning Commission, including but not limited to any design criteria included in those Guidelines.

(Amended by Ord. 166-16; see Sec. 102 history note.)

***Wireless Telecommunications Services (WTS) Facility, Macro.*** A Macro WTS Facility is generally characterized by significant spatial effects and more than two antennas. A WTS Facility is considered a Macro WTS Facility unless determined by the Zoning Administrator to be a Micro WTS Facility.

(Added by Ord. 166-16; see Sec. 102 history note.)

***Wireless Telecommunications Services (WTS) Facility, Micro.*** The Zoning Administrator shall determine whether a proposed WTS Facility is a Micro WTS Facility. A Micro WTS Facility is generally characterized by

(a) limited spatial effects;

(b) a small number of antennas (typically up to two);

(c) an absence of substantial cumulative effects on neighborhood character or aesthetics, when considered in conjunction with other WTS Facilities at the same project site; and

(d) a location that is not "disfavored" as specified in the Guidelines.

(Added by Ord. 166-16; see Sec. 102 history note.)

***Wireless Telecommunications Services Facility, Temporary.*** A Wireless Telecommunications Services Facility located on a parcel of land and consisting of a vehicle-mounted facility, a building-mounted antenna, or a similar facility, and associated equipment, that is used to provide temporary coverage for a large-scale event or an emergency, or to provide temporary replacement coverage due to the removal of a permitted, permanent WTS facility necessitated by the demolition or major alteration of a nearby property.

(Added by Ord. 166-16; see Sec. 102 history note.)

## X, Y, Z

None.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 69-87, App. 3/13/87; Ord. 131-87, App. 4/24/87; Ord. 32-91, App. 1/25/91; Ord. 63-91, App. 2/27/91; Ord. 14-15 , File No. 141210, App. 2/13/2015, Eff. 3/15/2015; Ord. 22-15, File No. 141253, App. 2/20/2015, Eff. 3/22/2015; Ord. 52-15 , File No. 141266, App. 4/30/2015, Eff. 5/30/2015; Ord. 73-

15, File No. 141303, App. 5/28/2015, Eff. 6/27/2015; Ord. 161-15, File No. 150804, App. 9/18/2015, Eff. 10/18/2015; Ord. 162-15 , File No. 150805, App. 9/18/2015, Eff. 10/18/2015; Ord. 188-15 , File No. 150871, App. 11/4/2015, Eff. 12/4/2015; Ord. 162-16 , File No. 160657, App. 8/4/2016, Eff. 9/3/2016; Ord. 166-16 , File No. 160477, App. 8/11/2016, Eff. 9/10/2016; Ord. 217-16, File No. 160424, App. 11/10/2016, Eff. 12/10/2016; Ord. 34-17, File No. 160925, App. 2/17/2017, Eff. 3/19/2017; Ord. 95-17, File No. 170125, App. 5/12/2017, Eff. 6/11/2017; Ord. 99-17, File No. 170206, App. 5/19/2017, Eff. 6/18/2017; Ord. 129-17, File No. 170203, App. 6/30/2017, Eff. 7/30/2017; Ord. 229-17, File No. 171041, App. 12/6/2017, Eff. 1/5/2018; Ord. 13-18, File No. 171096, App. 2/9/2018, Eff. 3/12/2018; Ord. 195-18, File No. 180268, App. 8/10/2018, Eff. 9/10/2018; Ord. 202-18, File No. 180557, App. 8/10/2018, Eff. 9/10/2018; Ord. 285-18, File No. 180806, App. 12/7/2018, Eff. 1/7/2019; Ord. 296-18, File No. 180184, App. 12/12/2018, Eff. 1/12/2019; Ord. 7-19, File No. 180917, App. 1/25/2019, Eff. 2/25/2019; Ord. 15-19, File No. 181046, App. 2/8/2019, Eff. 3/11/2019; Ord. 116-19, File No. 181156, App. 6/28/2019, Eff. 7/29/2019; Ord. 182-19, File No. 190248, App. 8/9/2019, Eff. 9/9/2019; Ord. 205-19, File No. 181211, App. 9/11/2019, Eff. 10/12/2019; Ord. 206-19, File No. 190048, App. 9/13/2019, Eff. 10/14/2019; Ord. 208-19, File No. 190594, App. 9/20/2019, Eff. 10/21/2019; Ord. 63-20, File No. 200077, App. 4/24/2020, Eff. 5/25/2020; Ord. 78-20, File No. 191075, App. 5/22/2020, Eff. 6/22/2020; Proposition H, 11/3/2020, Eff. 12/18/2020; Ord. 111-21, File No. 210285, App. 8/4/2021, Eff. 9/4/2021; Ord. 209-21, File No. 210808, App. 11/19/2021, Eff. 12/20/2021; Ord. 217-21, File No. 210807, App. 12/10/2021, Eff. 1/10/2022; Ord. 233-21, File No. 210381, App. 12/22/2021, Eff. 1/22/2022; Ord. 37-22, File No. 211263, App. 3/14/2022, Eff. 4/14/2022; Ord. 50-22, File No. 211299, App. 3/31/2022, Eff. 5/1/2022; Ord. 75-22, File No. 220264, App. 5/13/2022, Eff. 6/13/2022; Ord. 190-22, File No. 220036, App. 9/16/2022, Eff. 10/17/2022; Ord. 264-22, File No. 220811, App. 12/22/2022, Eff. 1/22/2023; Ord. 53-23, File No. 210585, App. 4/21/2023, Eff. 5/22/2023; Ord. 70-23, File No. 220340, App. 5/3/2023, Eff. 6/3/2023; Ord. 122-23, File No. 230371, App. 7/5/2023, Eff. 8/5/2023; Ord. 142-23, File No. 230410, App. 7/26/2023, Eff. 8/26/2023; Ord. 159-23, File No. 230732, App. 7/28/2023, Eff. 8/28/2023; Ord. 248-23, File No. 230446, App. 12/14/2023, Eff. 1/14/2024; Ord. 249-23, File No. 230701, App. 12/14/2023, Eff. 1/14/2024; Ord. 2-24, File No. 230704, App. 1/19/2024, Eff. 2/19/2024; Ord. 47-24, File No. 231223, App. 3/15/2024, Eff. 4/15/2024; Ord. 54-24, File No. 240169, App. 3/22/2024, Eff. 4/22/2024, Retro. 3/30/2024; Ord. 62-24, File No. 230310, App. 3/28/2024, Eff. 4/28/2024; Ord. 70-24, File No. 231225, App. 4/5/2024, Eff. 5/6/2024; Ord. 113-24, File No. 240193, App. 6/13/2024, Eff. 7/14/2024, Retro. 3/30/2024; Ord. 297-24, File No. 241055, App. 12/19/2024, Eff. 1/19/2025; Proposition O, 11/5/2024, Eff. 12/20/2024)

**AMENDMENT HISTORY**

Section amended in its entirety; Ord. 22-15, Eff. 3/22/2015 (for the legislative history of prior definition provisions, see the Editor's Note below). See individual definitions for subsequent amendment history notes.

**CODIFICATION NOTES**

1. So in Proposition H, 11/3/2020.
2. So in Ord. 75-22.
3. So in Ord. 50-22.

**Editor's Note:**

*As part of its substantial amendments to this Code, Ord.* 22-15 *consolidated the Art. 1 definitions into a single section, Sec.102 above. Previously, Art. 1 definitions had been codified under separate section numbers. For the purpose of retaining the legislative history of the now superseded Art. 1 definition provisions, the terms formerly defined in this Article are set out below, along with their history notes as they existed immediately prior to the effectiveness of Ord.* 22-15.

SEC. 102.1. ALLEY.

(Amended by Ord. 443-78, App. 10/6/78)

SEC. 102.2. ARTS ACTIVITIES AND SPACES.

(Added by Ord. 412-88, App. 9/10/88; Ord. 36-08, File No. 080157, App. 3/17/2008)

SEC. 102.3. BUILDING.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88)

SEC. 102.4. COURT.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88)

SEC. 102.5. DISTRICT.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 69-87, App. 3/13/87; Ord. 131-87, App. 4/24/87; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90; Ord. 217-05, File No. 050865, App. 8/19/2005; Ord. 72-08, File No. 071157, App. 4/3/2008; Ord. 298-08, File No. 081153, App. 12/19/2008; Ord. 61-09, File No. 090181, App. 4/17/2009; Ord. 90-11, File No. 110301, App. 6/9/2011, Eff. 7/9/2011; Ord. 98-11, File No. 110229, App. 6/15/2011, Eff. 7/15/2011; Ord. 196-11, File No. 110786, App. 10/4/2011, Eff. 11/3/2011; Ord. 176-12, File No. 120472, App. 8/7/2012, Eff. 9/6/2012; Ord. 182-12, File No. 120665, App. 8/8/2012, Eff. 9/7/2012; Ord. 56-13, File No. 130062, App. 3/28/2013, Eff. 4/27/2013 )

SEC. 102.6. DWELLING.

(Amended Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88)

SEC. 102.6.1. DWELLING SPECIFICALLY DESIGNED FOR AND OCCUPIED BY SENIOR CITIZENS.

(Added by Ord. 130-10, File No. 090906, App. 6/24/2010 ; amended by Ord. 62-13, File No. 121162, App. 4/10/2013, Eff. 5/10/2013 )

SEC. 102.7. DWELLING UNIT.

(Amended Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88; Ord. 218-14, File No. 140381, App. 10/27/2014, Eff. 11/26/2014, Oper. 2/1/2015 )

SEC. 102.8. FAMILY.

(Amended Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88)

SEC. 102.9. FLOOR AREA, GROSS.

(Amended Ord. 414-85, App. 9/17/85; Ord. 537-88, App. 12/16/88; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90; Ord. 275-03, File No. 021577, App. 12/10/2003; Ord. 129-06, File No, 060372, App. 6/22/2006; Ord. 298-08, File No. 081153, App. 12/19/2008; Ord. 173-12, File No. 120471, App. 8/2/2012, Eff. 9/1/2012 ; Ord. 182-12, File No. 120665, App. 8/8/2012, Eff. 9/7/2012; Ord. 232-14, File No. 120881, App. 11/26/2014, Eff. 12/26/2014 )

SEC. 102.10. FLOOR AREA, OCCUPIED.

(Amended Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88)

SEC. 102.11. FLOOR AREA RATIO.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88 ; Ord. 182-12, File No. 120665, App. 8/8/2012, Eff. 9/7/2012 )

SEC. 102.12. HEIGHT (OF A BUILDING OR STRUCTURE).

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88)

SEC. 102.13. LIVE/WORK UNIT.

(Added by Ord. 412-88, App. 9/10/88; amended by Ord. 56-02, File No. 012127, App. 4/29/2002; Ord. 218-14, File No. 140381, App. 10/27/2014, Eff. 11/26/2014, Oper. 2/1/2015)

SEC. 102.14. LOT.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88; Ord. 15-98, App. 1/16/98)

SEC. 102.15. LOT, CORNER.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88)

SEC. 102.16. LOT, INTERIOR.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88)

SEC. 102.17. NIGHTTIME ENTERTAINMENT USES.

(Added by Ord. 115-90, App. 4/6/90; amended by Ord. 172-11, File No. 110506, App. 9/12/2011, Eff. 10/12/2011)

SEC. 102.18. ONE OWNERSHIP.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.19. OPEN SPACE, REQUIRED.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.20. OPEN USE.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.21. PLAN DIMENSIONS.

(Amended by Ord. 443-78, App. 10/6/78; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.22. PRINCIPAL FACADES.

(Amended by Ord. 414-85, App. 9/17/85; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.23. STORY.

(Amended by Ord. 414-85, App. 9/17/85; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.24. STORY, GROUND.

(Amended by Ord. 414-85, App. 9/17/85; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.25. STREET.

(Amended by Ord. 414-85, App. 9/17/85; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.26. STRUCTURE.

(Amended by Ord. 414-85, App. 9/17/85; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.27. STRUCTURAL ALTERATIONS.

(Amended by Ord. 414-85, App. 9/17/85; Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.28. USE.

(Added Ord. 414-85, App. 9/17/85; amended by Ord. 412-88, App. 9/10/88; Ord. 115-90, App. 4/6/90)

SEC. 102.29. BEDROOM.

(Added by Ord. 298-08, File No. 081153, App. 12/19/2008)

SEC. 102.30. WIDTH, STREET OR ALLEY.

(Added by Ord. 298-08, File No. 081153, App. 12/19/2008)

SEC. 102.31. VEHICULAR USE AREAS.

(Added by Ord. 84-10, File No. 091453, App. 4/22/2010)

SEC. 102.32. ORNAMENTAL FENCING.

(Added by Ord. 84-10, File No. 091453, App. 4/22/2010)

SEC. 102.33. PERMEABLE SURFACES.

(Added by Ord. 84-10, File No. 091453, App. 4/22/2010)

SEC. 102.34. MOBILE FOOD FACILITY.

(Added by Ord. 297-10, File No. 101351, App. 12/3/2010)

SEC. 102.35. URBAN AGRICULTURE.

(Added by Ord. 66-11, File No. 101537, App. 4/20/2011, Eff. 5/20/2011)

SEC. 102.36. STUDENT HOUSING.

(Added by Ord. 188-12, File No. 111374, App. 9/11/2012, Eff. 10/11/2012)

SEC. 102.37. COTTAGE FOOD OPERATION.

(Added by Ord. 288-13, File No. 130998, App. 12/26/2013, Eff. 1/25/2014)

**EXHIBIT 3**

# Introduction
# to the San Francisco General Plan

**Land Acknowledgement:**

*The City and County of San Francisco acknowledges that we are on the unceded ancestral homeland of the Ramaytush Ohlone, who are the original inhabitants of the San Francisco Peninsula. As the indigenous stewards of this land and in accordance with their traditions, the Ramaytush Ohlone have never ceded, lost, nor forgotten their responsibilities as the caretakers of this place, as well as for all peoples who reside in their traditional territory. As guests, we recognize that we benefit from living and working on their traditional homeland. We wish to pay our respects by acknowledging the Ancestors, Elders, and Relatives of the Ramaytush Ohlone community and by affirming their sovereign rights as First Peoples.*

## Introduction

San Francisco is a place of singular beauty, combining an exquisite natural setting with a unique human-made urban landscape. Human settlement of San Francisco originated with the Ramaytush Ohlone people, who maintained three semi-sedentary villages on the peninsula. The Spanish colonists built on or near those lands when they established the Presidio and the Mission, resulting in the eventual displacement, subjugation, and cultural erasure of these communities. Since then, the City has grown with a density that is unusual on the West Coast. Where other cities flatten their hills or wind streets around them, here the rush to develop created a defiant street grid that accentuates the inclines and introduces dramatic vistas across the bay and deep into the cosmopolitan center. San Francisco's lively and varied pattern of neighborhoods, commercial centers, and parks has nurtured a remarkable diversity of communities. It has been not only a hub for the Bay Area but a global center of economic energy, technological innovation, and influential political, social, and cultural movements.

Amid this beloved setting lies the inherent, often hidden fragility, including vulnerability to natural disasters and to the mounting consequences of anthropogenic climate change. The city has also been shaped by a history of injustices including segregation, urban renewal, and the inequitable distribution of environmental benefits and burdens. The City's human scale is justly celebrated for its charm and livability – but the City continues to struggle with housing affordability.

## Purpose

The San Francisco General Plan is the embodiment of the City's vision for the future, serving to guide evolution and growth over time. It provides a comprehensive set of goals, objectives and policies that influence how people live, work, and move about, as well as the quality and spirit of the City. Periodic updates via a public adoption process ensure that this document remains freshly relevant. The General Plan governs actions by all arms of San Francisco's government. It is implemented by the city's direction of public resources and guidance of private development.

State law and San Francisco's Charter require a comprehensive, long-term general plan for the physical development of the city. The San Francisco General Plan ensures that there is adequate infrastructure to support residential, commercial, recreational and institutional land uses and facilities, and that neighborhoods are walkable and connected by a robust transportation system geared toward public transit, walking, and biking. Economic growth should position San Francisco for a resilient future sustainably linked to and coordinated with regional development.

The General Plan attempts to navigate complex imperatives between preserving cherished qualities and assets, tackling needed changes, and preparing for both known and unpredictable challenges and crises. In 2020, as the COVID-19 pandemic and the killing of George Floyd highlighted inequalities, the Planning Commission passed Resolution Number 20738 to center the Planning Department's work program and resource allocation on racial and social equity. This mandate has been incorporated into the General Plan. In doing so, the City and County of San Francisco acknowledges and apologizes for the history of inequitable planning policies and actions that have resulted in racial disparities. San Francisco must take reparative actions and build accountability in collaboration with American Indian communities, Black communities, communities of color, and other historically marginalized and disenfranchised communities.

## Process and Vision

The General Plan's goals, objectives and policies have been developed with extensive community engagement. These robust conversations and public hearings are designed to distill a shared vision for the City's future.

In this shared vision, San Francisco strives to be...

> *...a just city, committed to racial and social equity, starting with recognizing and seeking to rectify past injustices.*
>
> *…an inclusive city, where all can find a home and community as well a nurturing environment for creativity and self-expression.*
>
> *...a safe, livable and environmentally sustainable city, where all are able to live healthy lives and access thriving natural systems, restorative parks, and a high-quality built environment. The climate crisis requires urgent local, regional, and global action.*
>
> *...an economically vital city, where all are able to prosper. Economic vitality is possible only where stable, meaningful livelihoods are protected, entrepreneurial dynamism is fostered within an ecosystem that can withstand geopolitical turbulence and financial volatility, and everyone can access ladders to opportunity.*
>
> *...a city that recognizes that achieving justice, inclusivity, safety, livability, environmental sustainability and economic vitality requires accountable government, regional cooperation, transparent processes, and incorporation of diverse communities into all aspects of decision making.*

# Structure

The General Plan consists of a series of Elements and Area Plans.

Each Element addresses a topic and generally applies citywide, while Area Plans relate these topics comprehensively to specific parts of the city in a greater level of detail. Several of the Elements correspond to topics that state law requires the General Plan to address, including Air Quality, Community Facilities, Environmental Protection, Housing, Recreation and Open Space, Safety and Resilience, and Transportation. San Francisco has also chosen to address additional topics through Elements including Arts, Commerce and Industry, and Urban Design. Policies related to land use are located throughout the General Plan and are cross-referenced in a Land Use Index.

Environmental Justice policies required by the State have been integrated throughout the General Plan. The Environmental Justice Framework, hereby incorporated into the General Plan by reference, sets out key policy priorities and strategies which will be integrated into elements, area plans, and supporting documents to improve public health and other outcomes in Environmental Justice Communities, which are primarily communities of color and lower-income communities that face higher pollution levels and other health risks.

Area Plans of the San Francisco General Plan include:

- Balboa Park Station
- Bayview Hunters Point
- Candlestick Point *Subarea*
- Central SoMa (South of Market)
- Central Waterfront
- Chinatown
- Civic Center
- Downtown
- East SoMa (South of Market)
- Executive Park *Subarea*
- Glen Park
- Hunters Point Shipyard
- Market and Octavia
- Mission
- Northeastern Waterfront
- Rincon Hill
- Showplace Square/Potrero
- Transit Center District *Subarea*
- Treasure Island/Yerba Buena Island
- Van Ness Avenue
- Western Shoreline
- Western SoMa (South of Market)

Amended by the Board of Supervisors Ordinance No. 0084-23 on 05/09/2023.
Amended by Resolution No.14149 adopted on 06/27/1996.

San Francisco Planning Department
sfplanning.org

Questions or comments on the General Plan? Please email us at pic@sfgov.org.

**EXHIBIT 4**

# Recreation and Open Space Element

## INTRODUCTION

With its dramatic physical setting comprised of hilltops and mountains, surrounded by the bay and ocean, with nature woven through the landscape, San Francisco has an intrinsic connection with its environment. The opportunity the City provides to move outside and connect with nature has drawn countless thousands here over time, and that draw continues today.

As our City grows, we must not lose sight of these very qualities. If San Francisco is to continue to offer its residents, visitors, and workers a vibrant, civic, livable environment connected with the wonders of the natural world, we need a framework that ensures a world-class open space system. The goal of the City's Recreation and Open Space Element is to continue the City's legacy of fine parks and recreational opportunities, and guide the City's future decisions so they improve that open space system for the benefit of everyone.

## Why Is Recreation and Open Space Important?

Recreation and open space are critical components of any community's quality of life; for San Franciscans they are defining elements of the City itself. The City's open space system provides places for recreation, activity and engagement, for peace and enjoyment, and for freedom and relief from the built world. It serves the social and environmental health of the City, providing a sustainable environment. Among its benefits:

- **Open space and recreation activities improve resident's physical and mental health.** Open spaces and recreational facilities offer a wide range of health related benefits. They provide an opportunity for residents and visitors to exercise, give residents access to sunshine, nature and fresh air, and even encourage people to walk or bike from place to place. They can have a significant impact on people's stress levels and overall mental health, particularly in urban areas like San Francisco, and can be proven to be actual preventative measures that impact positively on health care and health care costs. Physical recreation reduces obesity and risk of cardiovascular disease, diabetes and other health ailments. Public open spaces, whether playgrounds, picnic fields or even just engaging streets, can help build community by giving neighbors a realm in which to get to know each other, and giving children a safe place to play.

- **Open space promotes environmental sustainability.** Natural habitat provides sanctuary for wildlife species ranging from mammals, birds and insects to plants; trees and other types of vegetation provided in open space networks can reduce air pollution; and wetlands can filter contaminants. The trails and streets of an open space network can also aid in reducing greenhouse gases, by providing alternative transportation routes and promoting bicycling and walking.

- **Open space and recreation activities can help to address environmental justice across a community.** Public recreation provides accessible and low cost opportunities to all San Franciscans, regardless of income level. High rates of childhood obesity and illness often correspond to fewer acres of usable open space. Provision of open space in areas with high concentrations of density, poverty, youth or seniors can redress equity issues. A clear example is how local food production increases access to fresh local produce and provides an opportunity for communities to connect with nature.

- **Open space provides tangible economic benefit.** Numerous studies have quantified the dollars that parks and tree plantings bring back to a city, by making the area more attractive for investment, by attracting and expanding local businesses, by increasing tourism and by enhancing property values. The Trust for Public Lands' study, The Economic Benefits of Parks & Open Space, cited testimony that our own Golden Gate Park has been shown to increase the value of nearby property to the tune of $5-$10 million additional dollars annually.

## How Are We Doing in Providing Recreation and Open Space?

By any measure, San Francisco is performing well against its urban counterparts. San Francisco has well over 3,400 acres of recreation and open space owned and managed by the Recreation and Park Department (RPD). It also contains over 250 acres of open space owned and managed by the State of California, and another 1600 acres of federally-owned open space. These publicly-owned open spaces make up almost 20% of the City's total land area. The quantity of usable open space increases even more when one includes the other spaces owned by city agencies, college campuses, schoolyards open during non-school hours, urban plazas or other publicly accessible outdoor spaces throughout the City, by another 560 acres. This puts San Francisco among the top five cities in the country in terms of parkland per resident. All of these open spaces are shown in *Map 1: Existing Open Space*.

**MAP 1 - Existing Open Space**

The 2004 Recreation Assessment was the culmination of a nine-month planning effort and process to evaluate the recreation needs of residents and to ensure the future direction of recreation within the SFRPD. The assessment pieced together critical issues, challenges and opportunities. It was the first such report developed solely for recreation in SFRPD's history. The Recreation Assessment identified where the SFRPD should focus its energies and resources as it applies to the Recreation Division, continuing the legacy of high quality recreation facilities and program services for the citizens of San Francisco. SFRPD should regularly assess its recreation component as required in the Charter. See *Map 2* for a map of existing Recreation Facilities.

**MAP 2 - Existing Recreation Facilities**

San Francisco values its recreation and open spaces. In 1974, San Francisco voters passed Proposition J, which directs a percentage of property taxes towards the City's Open Space Fund, to acquire new parks and open space. We spend more than any other urban area per resident on our parks, according to a 2008 report by the Trust for Public Lands, at an average of almost $200 per resident. But more revenue is needed as land costs increase and as we move to meet the challenges of providing space and recreation opportunities for a growing population.

# How Do We Define Recreation and Open Space?

Recreation and open space are critical components of any city, and by necessity have to come in different forms and experiences. Open space provides the 'breathing room' in a dense urban environment and promotes opportunities to engage in outdoor activities, access nature, enjoy scenic views, and experience our City's many ecosystems. Recreation includes activities that happen within open space both at outdoor or indoor facilities, the key elements being that the activity is beneficial by way of being fun, stimulating, refreshing, or relaxing in some form, either physical, mental, or the combination of the two. Active recreation involves physical activity while passive recreation usually involves sitting or lying down. Active recreation refers to a mix of uses in a neighborhood park that includes the following facilities types: athletic fields, buildings or structures for recreational activities, concessions, community gardens, courses or sport courts, children's play areas, dog play areas, or bike paths. A passive recreation area refers to a mix of uses in a park, undeveloped land or minimally improved lands which can include the following: landscaped areas, natural areas, ornamental gardens, non-landscaped greenspaces, stairways, decorative fountains, picnic areas, and water bodies without recreational staffing.

San Francisco's definition of recreation and open space system includes a variety of types of spaces, including traditional spaces and facilities for recreation such as:

- **Recreation Centers:** The City operates 25 multi-use recreation centers, providing playground and sports opportunities, as well as programming for youth, adults and seniors.
- **Playgrounds:** Children's playgrounds including play structures for toddler and older children.
- **Playing fields:** Including baseball courts, soccer fields, basketball and tennis courts, as well as children's and toddlers' playgrounds.
- **Unprogrammed or Unstructured Open areas:** Grassy, landscaped, or even paved open areas provide opportunities for unstructured time away from the dense urban environment.
- **Trails and Natural Areas:** Including 1,100 acres of natural lands, protecting the plant and animal habitats of these unique landscapes for residents and visitors to enjoy, trail systems, and other planted green areas.
- **Cultural Arts and Recreation Centers:** The Recreation and Parks Department offers a variety of classes, community event spaces, and cultural activities such as: art camps, dance and theater classes, programs on music and poetry for all ages.
- **Sports and Athletics:** The City's robust system of sports programs and facilities includes several citywide sports facilities, such as Kezar Complex in Golden Gate Park and Crocker Amazon Park Playground Sports Facility.

The recreation and open space system also includes spaces that supplement traditional parks in the City such as:

**Community Gardens:** Opportunities for residents to grow produce and flowers in their neighborhoods.

- **Living Streets, and alleys, plazas or parklets:** These are components of the public right-of-way that have been improved to provide a gathering space and enhance the pedestrian experience.

- **Privately-owned Public Open Spaces (POPOS):** Spaces owned by private development that are accessible to the public. POPOS come in a variety of forms including plazas, rooftop terraces, Greenhouse, and sun terraces, and include landscaping and public seating for the enjoyment of the public usually in dense neighborhoods.

- **Piers and wharves:** These are waterfront open spaces that provide shoreline access along the Bay edge. The Port provides public access along the perimeter of many of its piers as well as on individual public Piers such as Pier 7 and 14 as well as others.

Lastly, the system also includes spaces unique to San Francisco, such as such as Coit Tower, Union Square, Stern Grove, Palace of Fine Arts, and lesser known amenities like Camp Mather that offers outdoor camping experiences.

# Guiding Principles for Open Space and Recreation

San Francisco provides a significant amount of open space already for its residents, particularly given its small land area, its hilly topography, and its density, all of which challenge open space development. But we can do better, particularly in the better utilization, maintenance and design of our open spaces. The policies of the General Plan are intended to improve these aspects of our recreation and open space system. A holistic recreation and open space system encompasses the full range of spaces within our definition of open space, as well as the necessary experiences that are integral to San Francisco's unique identity. The Recreation and Open Space Element follows these guiding principles to ensure such holistic system:

**1. INTEGRATED & MULTIFUNCTIONAL.** A major theme developed from the outreach process was the concept of "making the most of what we have": utilizing and improving the expansive recreation and open space system the City already provides. An integrated and multi-functional open space network would respond to a variety of needs for recreation and open space, better utilizing the existing resources. Such needs range from refreshing from daily pressures of life to exercising and active sports, from appreciating the beauty of nature to maintaining natural habitats and wildlife, and from enjoying play time for kids and adults to housing civic and cultural events.

**2. SENSE OF PLACE.** San Francisco is a regional epicenter for ecological, economic, and cultural diversity. Open spaces should aim to build on our City's intrinsic qualities, both natural and cultural, and to reflect the values we place on cultural diversity and biodiversity. Furthermore, they should create a network that inspires a deep connection to place.

**3. EQUITY & ACCESSIBILITY.** Open space and recreational programs should be equitably distributed. They should provide access for all residents, workers and visitors, and work towards a democratic network that includes all neighborhoods.

**4. CONNECTIVITY**. San Francisco's network of open spaces should be wholly connected. The open space system should facilitate non-motorized movement, link diverse neighborhoods, be easy to navigate and understand and, where feasible, enhance habitat through connectivity.

**5. HEALTH & SAFETY.** Open space should increase the City's capacity to be a safe and healthy place to live. Its design should promote social interaction, wellness, and a healthy lifestyle by providing opportunities for physical, cultural and social activities, and a connection to nature.

**6. ECOLOGICAL FUNCTION & INTEGRITY.** With environmental sustainability as a driving theme, the quantity and quality of natural systems in the City should be preserved and expanded, by promoting aquatic and terrestrial biodiversity, by designing for watershed health, and by implementing environmental, ecological and conservation-minded strategies.

**7. SUSTAINING STEWARDSHIP.** San Francisco's community members should be actively engaged as participants in its future. Policies should work towards shared, continued stewardship that increases the tangible link between community members and their open space network. Partnerships between public agencies, private business, and community based non-profits, and individual members of the community to foster pride, purpose and community should continue to be developed.

# Related Plans and Agency Programs

The Recreation and Open Space Element, along with its related components that make up the City's overall Open Space Framework, aims to provide the elements needed to strive towards San Francisco's goal of a comprehensive open space network: a broad vision, a policy context, and a tangible task list for moving forward. The City also maintains several policy documents, plans and programs that provide direction about specific open space and recreational components, or to certain parts of the City. These include:

### *Street Park Program*

Street Parks is a partnership between San Francisco Parks Alliance and the San Francisco Department of Public Works (DPW) to support the development and maintenance of community-managed open spaces on DPW owned properties, such as streets, stairways, sidewalks, median strips, traffic circles, and vacant lots. Improvements can range from sidewalk landscaping to median plantings to creation of mini-parks in unpaved street right-of-ways and in traffic circles. The program provides technical support on how to accomplish such projects, organizing seminars to assist in building a budget, and can provide matching funds.

### *Better Streets/Public Realm Planning*

The City's Better Streets Plan, adopted in 2010, states that the City's rights-of-way should be "attractive, safe and useable public open space corridors with generous landscaping, lighting and greenery", providers of habitat for urban wildlife, and that they should invite multiple uses, including recreation. The Better Streets Plan provides a set of standards, guidelines, and implementation strategies to govern how the City designs, builds, and maintains its pedestrian environment. A number of public realm planning efforts implementing the principles of the Better Streets Plan are underway.

***Community and Area Plans***

A number of neighborhood-based planning efforts have been completed or are underway throughout the City. Each neighborhood plan seeks to increase the livability of several of San Francisco's urban neighborhoods by tapping the benefits of growth as a way to build more balanced neighborhoods. Most include capital improvement plans that draw from and build upon the policies of this Element to address a range of neighborhood needs including recreation, open space, and an improved public realm.

***Waterfront Plan***

The Port of San Francisco's Waterfront Plan (originally referred to as the Waterfront Land Use Plan) was initially adopted by the Port Commission in 1997, with an updated version adopted in 2023, defining acceptable uses, policies and land use information applicable to all properties under the Commission's jurisdiction. The Waterfront Plan defines locations for new public-private partnership projects coordinated with major public open space, park and recreation areas, maritime, and historic preservation improvements along the waterfront.

***Office of Community Investment and Infrastructure, (Former Redevelopment Agency), Open Space Planning***

The Office of Community Investment and Infrastructure, which is the successor agency to the Redevelopment Agency, created a significant amount of open space in its project areas, with more in the planning stages. New parks have been developed at Golden Gateway, in the Western Addition, Yerba Buena Center, Bayview Hunter's Point, Rincon Point - South Beach, Mission Bay, and Transbay. These spaces are currently being managed by the Office of Community Investment and Infrastructure and a number of different city agencies.

***Golden Gate National Recreation Area (GGNRA) Planning Efforts***

The GGNRA encompasses a number of open space and parklands throughout Marin, San Mateo and San Francisco, including Alcatraz Island, Crissy Field, the Presidio and the majority of the City's public beaches. A major planning process was completed by the SPUR for Ocean Beach to examine ways to manage coastal processes that drive erosion, ensure the future of critical infrastructure, protect natural resources, and activate and enhance the beach to best serve the local and regional populations.

***Significant Natural Resource Area Management Plan***

The San Francisco Recreation and Parks Department (SFRPD) has developed a Significant Natural Resource Areas Management Plan (SNRAMP) to address the restoration and management of the remaining elements of San Francisco's original ecosystem. The SNRAMP is implemented by the Natural Areas Program, a division in the Recreation and Park Department, and its goal is to restore and enhance remnant natural areas of the City, while also developing and supporting community-based stewardship of these areas. The program also includes a number of volunteer opportunities to engage students, businesses, groups, and individuals in the stewardship of San Francisco's natural lands.

***Association of Bay Area Governments Bay Trail Plan and Bay Area Water Trail Plan***

The Bay Trail Plan, adopted in 1989, includes a nine-county , 400 mile regional hiking and bicycling trail around the perimeter of San Francisco and San Pablo Bays. The Plan was prepared by the Association of Bay Area Governments pursuant to Senate Bill 100, which mandated that the Bay Trail:

- Provide connections to existing park and recreation facilities,
- Create links to existing and proposed transportation facilities; and,
- Avoid adverse effects on environmentally sensitive areas.

The San Francisco Bay Area Water Plan, adopted in 2005, was developed to create a network of launch and landing sites, or "trail heads". Such network would allow people in human-powered boats and beachable sail craft to enjoy the historic, scenic and environmental richness of San Francisco Bay through continuous, multiple-day and single-day trips on the Bay. The trail will promote safe and responsible use of the Bay, while protecting and increasing appreciation of its environmental resources through education and coordinated, and strategic access to the Bay.

***San Francisco Blue Greenway Planning and Design Guidelines***

The Blue Greenway Planning and Design Guidelines (draft released in 2011) catalog the open space network along San Francisco's Southeastern Waterfront, identify future open space opportunities; designate roadway designs for streets that link the open spaces, and prioritize improvements between neighborhood connections to the waterfront system of open spaces. In addition, it establishes design guidelines for signage and site furnishings along the entire length, identifies funding for Port projects and outlines a process for continued interagency coordination.

### *The Climate Action Plan (CAP)*

The 2021 San Francisco Climate Action Plan sets forth a set of actionable and measurable strategies that not only charts a pathway to achieve net-zero greenhouse gas (GHG) emissions, but also works toward addressing racial and social equity, public health, economic recovery, resilience, and the provision of safe and affordable housing to all. Integral to these strategies is improving San Francisco's parks, natural open spaces, and rights-of-way. The Plan includes several strategies addressing Healthy Ecosystems, including: restore and enhance parks, natural lands, and open spaces; maximize trees throughout the public realm; and increase greening and integration of local biodiversity into the built environment. The CAP provides specific targets and milestone, calls for ongoing monitoring to ensure critical measurement of progress, and allows for adjustments based on changing conditions.

### *San Francisco Recreation and Parks Department Project Standards and Design Guidelines*

The Project Standards and Design Guidelines were created to ensure a well maintained and actively used park system that supports the long-term health of people, plants, and animals. Recognizing that management practices have impacts beyond park boundaries, SFRPD developed the Standards and Guidelines to adapt to and preserve local systems through sustainable design of open spaces and facilities, and maintenance procedures. These practices include the use of proven sustainable materials and technologies.

## OBJECTIVES AND POLICIES

**OBJECTIVE 1**

### ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM

The City's goal is to make the very most of the open space assets that San Francisco's robust system already provides. Well-maintained, highly utilized, and integrated open spaces are hallmarks of a unified and connected open space system with diverse programming, numerous amenities, and regular maintenance. Offering a diverse range of active and passive recreational opportunities in the City's current recreation and open spaces would help better utilize existing resources and encourage access for diverse users and activities.

**POLICY 1.1**

**Encourage the dynamic and flexible use of existing open spaces and promote a variety of recreation and open space uses, where appropriate.**

San Francisco has a variety of high-quality open spaces, where diverse types of users can engage in a myriad of activities—children can play, seniors can linger on benches and socialize, people can exercise and enjoy nature, and families can gather for a picnic. San Francisco's open spaces vary in their form and function: from smaller local green streets, pocket parks, plazas, and community gardens; to neighborhood parks, playgrounds, sports fields, and recreation centers; to large regional-serving parks such as Golden Gate Park and special destinations such as Camp Mather. To ensure vibrant parks and open spaces the City should deploy a diverse range of opportunities, including the following options:

- Provide recreational opportunities, both active and passive, that respond to user demographics and emerging recreational needs.
- Include innovative community-driven uses such as food production, education, and improved streetscaping.
- Design open spaces that include both active programming and passive uses in tranquil spaces.
- Provide programming for healthy and active lifestyles.
- Add user amenities such as concessions that cater to and attract visitors.
- Expand opportunities for temporary uses such as festivals, art, performances, and farmers markets.
- Allow active engagement with natural areas through public access trails, wildlife observation, birding, and educational displays and programs.
- Increase cultural programming and activities based on neighborhood need and interest.
- Provide spaces and structures that

Some of the City's open spaces and recreational facilities are underutilized and need additional programming and activation to address community interests and needs. These underutilized spaces offer a tremendous opportunity because the space is already owned and operated by the City. Such locations would in most cases require minimal renovation to take full advantage of the space. These open spaces and recreational facilities should be redesigned or re-programmed to better serve the needs of the surrounding neighborhood,

while ensuring a flexible design to adapt to changing neighborhood needs over time. Some types of public spaces that have traditionally been overlooked can offer additional opportunities for innovative and community-driven strategies for activation – wide sidewalks and traffic medians can be considered for community gardens, and parking lots and other spaces can support temporary festivals and farmers markets. There also are events large and small, such as fairs, concerts, and sporting events, that occur annually or on a recurring basis in parks and open spaces throughout the City. These events are often well-attended and enjoyed by many residents and visitors. In some cases the draw of these events provides the first exposure for many people to the City's diverse parks and open spaces. The City should continue to evaluate how these events impact the open space itself and on the surrounding neighborhoods.

### POLICY 1.2
### Prioritize renovation in highly-utilized open spaces and recreational facilities and in high needs areas.

Many of the City's open space and recreational facilities support a high intensity of uses. These spaces clearly provide a welcome respite for residents and visitors, but they are often so heavily utilized that more frequent maintenance is necessary to keep up with their heavy usage. The City should perform user studies and collect usage data to assess which of the existing recreation and open spaces are the most highly used so that those spaces may be targeted for renovation and improvement. Renovation of resources also should be prioritized in "high needs areas," defined as areas with high population densities, high concentrations of seniors and youth, and lower income populations, that are located outside of existing park service areas(See *Map 7: High Needs Areas: Priority Renovation & Acquisition Areas* and Policy 2.1).

### POLICY 1.3
### Preserve existing open space by restricting its conversion to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of open space.

The shortage of vacant sites and the intensity of development in San Francisco produce pressures on the City's public open spaces, sometimes putting spaces at risk of conversion to uses not serving the public purpose of respite and recreation. These same factors generate considerable public demand for access to open spaces. It is essential that the City protect its public open spaces from conversion to other uses, which threatens the overall integrity of the open space network.

Outdoor space in parks and playgrounds should not be diminished except in very unique cases. Yet, despite general agreement on the need to preserve public open space, developments may indeed be proposed on public land designated as open space. It is anticipated that the most persuasive arguments in favor of development will be based on the "public value" of the proposed development. The public value will differ among proposals, and a determination of this projected value as compared the potential open space benefit will be difficult and must be subject to rigorous public scrutiny. In order to assist in this determination when proposals for new development occur, the following provisions should be applied:

***1. Proposals for Non-recreational Uses on Recreation and Park Department Land:***

Decisions related to non-recreational uses on RPD land shall conform to the San Francisco Charter Section 4.113. The Charter requires a vote of the electors for park property to be sold or leased for non-recreational purposes or to build any structure for non-recreational purposes on park property. The Charter also notes that the Recreation and Parks Commission, with the approval of the Board of Supervisors, may use subsurface space for parking or other uses that would not be detrimental to the original park purpose.

***2. Proposals for Permanent New or Expanded Recreational and Cultural Buildings, and Supporting Facilities on Recreation and Park Department Land:***

A properly balanced recreation system combines both indoor and outdoor spaces and programs. Indoor recreational facilities are as important as outdoor space in a well-integrated park system. New indoor recreation facilities may be necessary to respond to local community needs, changing demographics of many San Francisco neighborhoods, and shifting maintenance requirements. Additionally, amenities that serve users of recreational facilities and open spaces – such as bicycle rental stands, cafes, and kiosks – can help provide services that enable and attract more people to visit and use underutilized open spaces and spend more time there. Culture is also an important aspect of community recreation; cultural facilities such as libraries or community spaces can support and enhance the existing park system. Proposals for such facilities or uses should be carefully evaluated to ensure the proposed location is optimal and appropriate. Decision-making bodies should consider the following criteria in making their determinations on such proposals:

- Facility directly serves and improves the existing open space by supporting better utilization of space while continuing to provide public access and respond to the needs of the local community.
- Facility is limited in size. The size will vary by open space, but the size shall be limited to the smallest footprint appropriate and feasible for the proposed use, taking into account the intensity of use, expected participants and spectators, as well as other relevant factors.
- Facility incurs limited impacts on the existing open space (because of a preponderance of nearby outdoor open space or other factor), or the projected public benefits outweigh the impacts.
- A clear rationale exists for siting the facility, articulating the advantages of the proposed site compared to reasonable alternatives.

Aloss of open space resulting from approval of the proposed facility generally should be offset with replacement open space of equal or higher quality. This new open space can be provided through a variety of ways, such as the removal of existing non-utilized structures, the acquisition of new space, or rearrangement of existing recreational and open space uses to better integrate these uses and the proposed facility. Maintenance facilities, restrooms, and other park-supporting facilities owned and operated by the Recreation and Park Department that are necessary for the maintenance of parks are exempt from these requirements.

***3. New and Expanded Facilities in Non-RPD Open Spaces:***

Many of the City's current and potential open space sites are under the jurisdiction of public agencies other than the Recreation and Park Department ("RPD") - including the Port of San Francisco (the Port), the SFPUC, the Office of Community Investment & Infrastructure, and the Department of Public Works. These spaces include parkland, shoreline access, reservoirs, grounds of public institutions, streets, alleys, and undeveloped street rights-of-way, and are shown in *Map 3: Existing and Proposed Open Space*. In some cases, these non-RPD-owned sites are intended for public uses other than recreation and the site's role as open space is secondary to the primary use. Yet their role as open space is important, as they supplement playgrounds and parks and are a major visual asset.

New facilities related to that primary use, or expansions of various types of supporting facilities may be requested. These proposed facilities may be necessary to perform the public function of the particular land-owning agency. Decision-making bodies should analyze all of the following criteria in making their determinations on such proposals:

- Facility is necessary to provide the public service or operations of the agency holding the site in question.
- A clear rationale exists for siting the facility, articulating the advantages of the proposed site compared to reasonable alternatives.
- Facility incurs limited impacts on the existing open space (because of a preponderance of nearby outdoor open space or other factor), or the projected benefits outweigh the impacts.

Upon approval, the city may request the sponsoring agency to meet certain design criteria and performance standards that ensure conformity with the General Plan.

**MAP 3 - Existing and Proposed Open Space**

***Removing non-recreational uses***

In keeping with the overall policy goal of limiting encroachments, the City should also pursue eliminating non-recreational uses in its public open spaces. In the past, parks and playgrounds have been used as sites for public facilities such as fire and police stations, sewer plants and schools. Undoubtedly, the public need for them was great at the time of their construction and many are still essential. But as non-recreational facilities such as these require maintenance, the City is faced with the decision to renovate them or to relocate them altogether.

Where it is possible to provide services elsewhere, the City should demolish the facility so as to return the site to open space use. If the facility can be successfully converted to recreational use, then reuse could be an alternative to demolition. The City should not, however, permit the reuse of such facilities for other non-recreational purposes. The same policy should apply to the reuse of obsolete recreational facilities.

***Temporary Structures***

Temporary structures are often needed for different events, and in the case of natural disasters, our parks serve as temporary evacuation space. Therefore, all temporary structures (i.e. all structures that do not have in-ground footing attached to the structure) in compliance with the City's permit process are exempt from the above requirements. Use of such structures beyond their original intent, however, would be subject to the criteria explained earlier in this policy.

**POLICY 1.4**
**Maintain and repair recreational facilities and open spaces to modern maintenance standards.**

Maintaining open spaces and recreational facilities at a high level of quality will help ensure that they are well-utilized and enjoyed. In order to maintain this goal, the City should continue to employ well-trained staff, such as gardeners, arborists, electricians, plumbers and other tradespeople to maintain our open space system and recreational facilities.

However, maintaining the City's existing recreation and open space system in a good condition continues to be a challenge due to intensive use, facility age, and a high number of sites. The City has diminishing resources devoted to general maintenance and upkeep. The city, especially for private and supplemental spaces, should continue to explore creative partnerships to meet maintenance goals of parks and open spaces, including those within the jurisdiction of other agencies, such as the Port or National Park Service. Where feasible and in keeping with the City's goal of providing well-maintained spaces the City should continue to seek alternative maintenance

methods, such as working with non-profit stewards, or developing alternative maintenance agreements. Similarly, where open space is maintained by entities other than the City, such as the National Park Service, the City should advocate for ongoing maintenance of such facilities, particularly when such facilities fall into disrepair and become unusable.

The Recreation and Parks Department owns a significant portion of the City's open space system. With over 220 parks and 3000 acres of parkland, RPD requires significant resources to keep the system in good to excellent condition. However, even as RPD continues to seek additional funding sources to address these needs, maintenance continues to be a problem due to rising costs and limitations on staffing and equipment.

RPD now evaluates parks on a quarterly basis and in addition the City Controller's Office provides an annual report on the state of the City's parks. Further, RPD uses a facility lifecycle management database to prioritize the RPD's deferred maintenance needs. The reports have helped direct RPD management and City resources to address maintenance needs. The City should continue to analyze maintenance needs by using these reports and other sources as data from users throughout the recreation and open space system to ensure the maintenance standards are met and funding is adequate.

### POLICY 1.5
### Prioritize the better utilization of McLaren Park, Ocean Beach, the Southeastern Waterfront and other underutilized significant open spaces.

Some of the City's large signature spaces offer a special opportunity to provide multifunctional open spaces that serve a diverse set of users. In particular:

***McLaren Park***

McLaren Park is a citywide resource due to its large size, varied landscape, and the specialized activities and programs located within the park. At the same time, it is located in an area of the City with one of the highest concentration of children, youth, seniors, and low-income households. McLaren Park should offer uses which satisfy the recreation needs of adjacent neighborhoods as well as meeting the needs of the city. The McLaren Park Master Plan was originally written in 1983, updated in 1996, and most recently updated with recommendations in the 2010 McLaren Park Needs Assessment and published the McLaren Park Vision Plan in 2018. The City should ensure that the objectives and priorities of the Master Plan provide effective guidance for the needs of the park today.

Development of the park should capitalize on the site's natural conditions, including topography, existing native vegetation, and views, in compliance with RPD guidelines. New plantings should be added to provide habitats and windbreaks, to define sub-areas of the park, and to provide colorful and attractive visual accents. Plant species should be hardy, wind- and fire-resistant, and provide for and enhance wildlife habitats.

In an effort to increase park use, the City should continue promoting events that attract visitors to the Park. For example, Jerry Garcia Day, an annual festival held in honor of the local musician, draws thousands of visitors to the park. Revenues generated from such events could fund maintenance of and improvements to recreation facilities and open space.

The City should consider a number of improvements to McLaren Park. Existing traffic conditions should be examined to reduce conflicts between vehicles and park users. The City should investigate the feasibility of improving the existing right of way in the park to allow for safe pedestrian, vehicular and bike access where appropriate and converting those areas to recreational use. The existing trail system should be retained and improved by completing missing linkages. Any new development should build on the existing infrastructure including roads and parking areas, the irrigation system and drainage structures, and lighting and electrical installations. Infrastructure that is damaged should be replaced within the existing network, channel or path. New recreation areas should serve active, as well as passive, non-organized recreation needs, that respond to a wide spectrum of park users.

***Ocean Beach***

Ocean Beach offers a vast, unbroken expanse of natural open space that is one of the longest urban beaches in the country. The area historically served the growing San Francisco population with the Sutro Baths, the Cliff House, the Fleishhaker Pool, and an amusement park, but now suffers from erosion and a lack of amenities. At the same time, Ocean Beach is annually visited by as many as three million people for activities such as walking, picnicking, sunbathing, jogging, dog walking, surfing, fishing, and simply enjoying the natural beauty.

Ocean Beach faces significant obstacles to fulfilling its potential as a great public space at the city's edge. First, critical components of the wastewater infrastructure are located near the beach, with some elements that are threatened by erosion. Coastal management to protect infrastructure, ecological resources, and public access is a complex challenge. The erosion is likely to worsen as climate-related sea level rise accelerates. In addition, Ocean Beach is administered by a host of Federal, State, and Local agencies, including the National Park Service[1], the SF Recreation and Park Department, the San Francisco Public Utilities Commission, and the State Coastal Commission.

A non-binding Master Plan for Ocean Beach has been developed by a project team led by San Francisco Planning and Urban Research (SPUR) and incorporating input from an interagency Steering Committee, Planning Advisory Committee (PAC), Technical Advisors and the general public. The plan addresses the complex challenges faced at the coastline, including severe erosion, jurisdictional issues, a

diverse array of beach users and points of view, and the looming challenge of climate-induced sea level rise. It presents recommendations for the coastline and how it should be managed and protected for the stretch from the Cliff House to Fort Funston, spanning roadway changes, bike and pedestrian connectivity, technical interventions, and ecological restoration.

To help address the issues described above, the SFPUC, in partnership with other agencies, is implementing the Ocean Beach Climate Change Adaptation Project for the southernmost portion of the beach and surroundings. The Adaptation Project builds upon several previous efforts including the Coastal Protection Measures and Management Strategy for South Ocean Beach (2015) and the Ocean Beach Open Space Landscape Design (2017). Project elements include, but are not limited to, managed retreat, structural protection, access and recreation improvements, and beach nourishment.

1. Most of the beach is GGNRA property.

### *Southeastern Waterfront/The Blue Greenway*

The Blue Greenway is a project to improve and expand the public open space network along the City's central and southern waterfront from China Basin Channel to the San Francisco County Line. Collectively, the Blue Greenway is intended to provide opportunities for much-needed open space that is easily accessible for exercise and recreation, including bicycle and pedestrian access, recreational uses in the water, (e.g. kayaking), access to historical resources, and enjoyment of art as well as waterfront public access from nearby neighborhoods. The plan realizes objectives set forth in the Association of Bay Area Government's (ABAG) Bay Trail Plan and the Bay Area Water Trail Plan. High priority should be given to the project's completion as it will provide a much-needed open space system that is easily accessible for exercise, recreation and enjoyment of art and open space in the City's southern and central corridor. (See *Map 8: Blue Greenway* and Policy 2.4)

### POLICY 1.6
### Support the continued improvement of Golden Gate Park while preserving the beauty of its landscape.

Golden Gate Park is San Francisco's largest and one of its most important parks, with over 1,000 acres of open space and an estimated number of users topping 13 million annually. The park offers immeasurable opportunities to meet the needs of neighborhood, citywide and regional residents, and visitors from national and international destinations. The landscape design and natural legacy of Golden Gate Park are some of the many features that draw people to this park, and they would benefit from additional investment in restoration efforts. Many recently renovated and new facilities in the park, including the Conservatory of Flowers, the DeYoung museum, and the new California Academy of Sciences, have made the park increasingly popular. After ten years of community input, the City completed a 1998 Master Plan, a comprehensive plan that laid out landscaping, circulation, recreation facilities, buildings and monuments, utilities and infrastructure, maintenance, as well as funding for this signature open space. This Master Plan provides guidelines for continued improvements.

1. **Assess the Master Plan:** Many of the proposals in the Plan have been completed, while some remain unfinished. Golden Gate Park is one of the City's most important resources and a detailed assessment of the Master Plan should be completed to determine if the goals for the Master Plan have been implemented. In the long-term, the City should work with the community to determine if this Master Plan should be updated.

2. **Improve pedestrian access to Golden Gate Park:** Current pedestrian access around and to Golden Gate Park is highly limited, with sidewalks entirely lacking along one side of Lincoln Avenue, and limited formal pedestrian access points into the park. The City should consider a long-term goal of improving pedestrian access into the park and along its edges and discouraging entering the park on improvised trail entrances, which harms the flora in the Park. In response to the Master Plan's recommendation for a comprehensive signage system, signage standards were developed and many new signs have been added to the Park.

3. **Discourage automobile traffic:** The increasing popularity of the Park has also brought an increase in users. The City should continue to pursue alternative transportation to and within the park and examine both incentives for alternative transportation and disincentives for automobile traffic. The City should study potential options for improving the pedestrian experience, including considering roadway improvements and redesign(such as the cross-park tunnel that is incorporated in the Doyle Drive project at the Presidio) to improve safety and enhance views.

### POLICY 1.7
### Support public art as an essential component of open space design.

Art plays a critical role in both activating spaces and indicating to passersby that the space is public. The public requirement for art, originally passed in 1969, established the importance of monumental art integrated within public projects. This ordinance, currently titled the Art for Enrichment program, requires two percent of the construction cost of civic projects, including buildings, transportation projects, and new parks to be spent on public art for civic projects.[2] In 1985, the Downtown Plan required certain private projects to spend one percent of the project's worth on the provision of public art. This requirement was expanded to other areas the city in a new Ordinance in 2012.[3] In order to promote art in public and open spaces, the City should continue to evaluate the possibility of expanding

this requirement to other areas in the City. These projects vary greatly in their style and substance, from murals to monuments, but they have in common the ability for the public to access them. When parks or open spaces are renovated or new spaces are built, public art should be placed where it's both visible and appropriate given the parkland or open space.

2. For additional detail, See San Francisco Administrative Code, Section 3.19.

3. For additional detail, See San Francisco Planning Code, Section 4.29.

### POLICY 1.8
### Support urban agriculture and local food security through development of policies and programs that encourage food production throughout San Francisco.

The benefits of urban agriculture include increased access to healthy fresh food, a closer connection between residents and their food system, and opportunities for community-building and beautification. The growing movement to increase urban agriculture should be supported on both public land and on private spaces where possible. Currently, a huge and unmet demand for more community garden space exists in the City. Urban gardens should be permitted and promoted in public open spaces. To promote this goal, the Mayor's 2009 Executive Directive on Healthy and Sustainable Food encourages food production within the City and requires departments to identify public land for food production. City practices should support the work of organizations promoting urban agriculture, and explore ways to increase their access in new housing developments, existing publicly managed housing developments, and other public lands. The City should continue to make it a priority to find additional public spaces to meet this need. The City's Administrative Code also calls for comprehensive programs, policies, and strategies to generally enhance and increase urban agriculture uses. The City should also incentivize creation of community agriculture on private sites, such as private yards and building rooftops. Activities that allow distribution of locally grown food, such as farmers markets, Community-Supported Agriculture (CSA) distribution sites, or even direct sales of local and large-scale urban agriculture, should be considered a valuable part of activating underutilized public and private open spaces.

### POLICY 1.9
### Preserve sunlight in public open spaces.

Solar access to public open space should be protected. In San Francisco, presence of the sun's warming rays is essential to enjoying open space. Climatic factors, including ambient temperature, humidity, and wind, generally combine to create a comfortable climate only when direct sunlight is present. Therefore, the shadows created by new development nearby can critically diminish the utility and comfort of the open space.

Shadows are particularly a problem in downtown districts and in neighborhoods immediately adjacent to the downtown core, where there is a limited amount of open space, where there is pressure for new development, and where zoning controls allow tall buildings. But the problem potentially exists wherever tall buildings near open space are permitted.

Properties under the jurisdiction of the Recreation and Park Department or designated for acquisition are protected by a voter-approved Planning Code amendment. It restricts the construction of any structure exceeding forty feet in height that would cast a shadow that is adverse to the use of the park from between one hour after sunrise to one hour before sunset, unless it is determined that the impact on the use of the space would be insignificant. In determining whether a new shadow cast by a development is adverse to the use of a particular property, the City considers several quantitative and qualitative criteria, including the size of the park property, the amount of existing shadow, and the timing, size, location, and duration of the new shadow and the public good served by the building.

The City should support more specific protections elsewhere to maintain sunlight in these spaces during the hours of their most intensive use while balancing this with the need for new development to accommodate a growing population in the City.

### POLICY 1.10
### Ensure that open space is safe and secure for the City's entire population.

Safety and security in the City's open spaces is essential to allow San Franciscans to enjoy their community open spaces. Improving the design of an open space through design treatments can reduce the fear of crime and the actual level of crime. Design treatments can include:

- Providing clear sightlines, where appropriate.
- Designing the street/open space interface to encourage permeability and access.
- Ensuring adequate and appropriate lighting.
- Better utilizing parks and open space to increase park visitors and encourage "eyes on the park."

### POLICY 1.11
### Encourage private recreational facilities on private land that provide a community benefit, particularly to low and moderate-income residents.

Outdoor space is not the only medium for physical activity. San Franciscans use indoor recreation spaces for activities like swimming, tennis, basketball, ping-pong, yoga, and general fitness and group classes. Private recreational sources, such as clubs and gyms, offer residents spaces to participate in such activities. In permitting new development, San Francisco should continue to encourage space for physical activity, including private recreational facilities in building projects to supplement those provided by the City.

Some private and non-profit recreational facilities act in a quasi-public manner. These may provide free or low-cost community access, supplementing existing City programs in underserved communities for active education, sports and recreational activities. Examples include the YMCA, Boys and Girls Clubs, and other community-based organizations. These types of facilities should be supported when they serve San Francisco residents, and, if removed, the loss of recreational space they provide should be considered.

For-profit recreational facilities can offer similar educational and recreational benefits, provided the participant can pay. Examples include country and tennis clubs, yoga studios, and private gyms. These facilities should receive support, based on the level at which they can demonstrate they are meeting underserved low and moderate income need. Such facilities should be encouraged to offer neighborhood discount or “community class” rates to improve access for community members that are not able to afford full rates. The City should also look for opportunities to partner with such private organizations, to provide benefits to the public at a lower cost.

### POLICY 1.12
### Preserve historic and culturally significant landscapes, sites, structures, buildings and objects.

Historic resources are an important element of our park system. The value of these resources should be preserved and celebrated because they provide an important link to the significant events, people, places or design that they represent.

### POLICY 1.13
### Preserve and protect character-defining features of historic resources in City parks, when it is necessary to make alterations to accommodate new needs or uses.

The City should identify, evaluate, and preserve historic and cultural resources in City parks. Prior to any project that involves the alteration or replacement of any of these resources, the City should conduct a comprehensive survey and analysis to identify resources and associated character-defining features within the vicinity of the proposed project. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the resource should generally be avoided. The replacement of historic and cultural resources and features should be avoided if possible.

## OBJECTIVE 2
## INCREASE RECREATION AND OPEN SPACE TO MEET THE LONG-TERM NEEDS OF THE CITY AND BAY REGION

In an urban area, the most critical factor in the provision of open space is its distribution. All types of open space activity - from sports fields to playgrounds - should be accessible to and within walking distance of every resident of the City. Walking distance, however, ranges depending on the type of activity and the resident. A half mile is commonly accepted as a distance that can be comfortably walked in 10 minutes, and as a distance most people are willing to walk to access community uses.[4] For most recreational activities, including active ones such as hiking, biking and sports activities; or for passive ones, like picnicking, this walking distance is acceptable. However, for activities that involve small children, such as a playground, one-quarter mile (a five minute walk) is more appropriate. Using these walking distances, and taking into account topography and other barriers, the City’s open space is generally well distributed, as illustrated in *Map 4: Walkability*.

4. Regional Plan Association (1997) Building Transit-Friendly Communities A Design and Development Strategy

**MAP 4 - Walkability**

However, some parts of the City are still deficient in certain types of open space. The eastern side of the City has a lack of large open spaces. While certain areas are planned and zoned for Production, Distribution, and repair (PDR) uses and for maritime industries, other areas were recently rezoned to support additional residential development. The future population increase in these areas and throughout the City (See *Map 6: Areas of Potential Additional Population Growth, 2040*) will exacerbate current open space deficiencies.

Many parts of the City also lack playground space. Sports fields are well-distributed; however, capacity is limited and the demand for their use is often greater than what can be provided in neighborhood spaces.

Even in neighborhoods that have open spaces within walking distance, higher density and lower income populations may mean demand in these areas exceeds the capacity of local open spaces. As these communities continue to grow, open space improvements and acquisition are needed to maintain access to this limited resource. This objective, and the policies that follow, are aimed at addressing these deficiencies through new or improved open space provision.

### POLICY 2.1
### Prioritize acquisition of open space in high needs areas.

Throughout the country, safe, green open spaces are in short supply in dense communities, where low-income and minority populations tend to be concentrated, as well as large numbers of children and seniors. In the more densely populated, older areas of San Francisco, people often have less mobility and fewer financial resources to seek recreation outside of their neighborhood. People in less dense parts of the City may enjoy use of private yards and patios, while residents in denser neighborhoods may not have that option. Finally, studies have found that the need for a park as a restorative "oasis" is most critical in dense urban areas.

Priority for acquisition of new space to address open space inequities should be given to high need areas, defined as places where there is low access to open space (illustrated in *Map 4: Walkability*),a conglomeration of high density, high percentages of children, youth, seniors, and low income households (illustrated in *Map 5: Population Density, Household Income, Concentration of Children and Youth, Concentration of Seniors*), and in which the most growth is projected to occur between now and 2040 (illustrated in *Map 6: Areas of Potential Additional Population Growth, 2040*).[5] Future areas with adopted master plans or Redevelopment plans, such as Mission Bay, Park Merced, Hunters Point Shipyard/ Candlestick, and Treasure Island (See *Map 4D: Walkability: Proposed Open Spaces in Large Plan Areas*) have identified site specific open spaces and recreational facilities, along with funding and implementation strategies for those parks and recreation facilities. These proposed site-specific parks and open spaces would support the planned population growth and therefore these proposed parks are incorporated into the analysis as existing park spaces. Layering all of these factors results in *Map 7: High Needs Areas: Priority Acquisition & Renovation Areas*. This map and analysis should be updated periodically using updated decennial US Census data.

5. The Planning Department Land Use Allocation distributes projected housing and employment growth as determined by the Association of Bay Area Governments to 981 Traffic Analysis Zones (TAZ). These zones vary in size, from a block around downtown to several blocks in more outlying areas. The allocation of TAZ-specific growth is based on the current development pipeline (development projects under construction, approved or under review) and an estimate of additional development potential for each TAZ.

**MAP 5 - Population Density, Household Income, Concentration of Children and Youth, Concentration of Seniors**

**MAP 6 - Areas of Potential Additional Population Growth (2040)**

**MAP 7 - High Needs Areas: Priority Acquisition & Renovation Areas**

Recreation and Parks Department maintains an Acquisition Policy, as required by the City Charter (Section 16.107) and the Park Code (Section 13.02), aimed at facilitating acquisition of open space in high needs areas. The Acquisition Policy provides guidance to promote equitable recreational and open space opportunities through several criteria: location in High Needs Areas, available funding sources that may be leveraged, inter-jurisdictional cooperation, and community support. In order to maintain new acquisitions, the policy also acknowledges the need to identify and leverage resources for continued maintenance and operational support.

New acquisitions should continue to consider the composition of current and projected neighborhood populations. There are both demographic and cultural differences in how people use parks: preschoolers, school age children, teenagers, adults, and senior citizens have distinct open space needs that should be accommodated, that may also vary according to social and economic groups. Design of new spaces should rely on the specific needs and values of its user communities, by using a participatory community design process.

While open space acquisition should not be limited by the City's inability to maintain additional parkland, the City should recognize that acquisition will require an on-going commitment of additional resources for maintenance. In appropriate cases, the City should acquire the property and develop low cost maintenance techniques and programs for open space that are not used for intensive recreation, or should hold the land vacant until development and maintenance funds are available.

### POLICY 2.2
### Provide and promote a balanced recreation system which offers a variety of high quality recreational opportunities for all San Franciscans.

The City's goal is to ensure that all San Franciscans are within a reasonable walk from an open space with a range of active and passive recreational opportunities. To ensure the highest quality of recreational opportunities for its residents, the City must be able to respond to changing demographics, neighborhood demand, and emerging recreational trends as it plans for new or expanded recreation and open space. The recreation system should provide an equitable distribution of facilities and services and consistent hours of operation. It should also provide sufficient opportunities for populations who are frequent users of open space, such as seniors and children.

### POLICY 2.3
### Provide recreational programs that are responsive to community needs and changing demographics.

In 2010, SFRPD implemented a new recreation system that focuses on flexibility and responsiveness to changes within communities by providing appropriate programming based on community interest and demand. To stay up-to-date with current needs and interests, RPD routinely surveys their recreation program users. The results provide RPD with information to ensure that programs and services meet the existing needs of neighborhood residents and are on the cutting edge of emerging trends.

RPD also works with the Department of Children, Youth, and Their Families (DCYF) on their Community Needs Assessment, conducted every two years. RPD participates in the assessment as a service provider, and relies on this report to update its recreation programming in coordination with other surveys and assessments. RPD and the City should continue to provide innovative recreational programs that respond to changing community needs.

### POLICY 2.4
### Support the development of signature public open spaces along the shoreline.

The Pacific Ocean, San Francisco Bay, and their respective shorelines are important natural resources in San Francisco. They offer opportunities for water-oriented recreation, passive recreation, views, and habitat. Most of the property adjacent to the thirty-two mile shoreline is in under public ownership. Maintaining public access to the waterfront is integral to San Francisco's identity and creating continuous open spaces along the ocean and bay is one of the City's long-term goals. Much of the waterfront is already accessible to the public, through parks ranging from Fort Funston, Ocean Beach, the Presidio and Fort Mason to the urban waterfront of the Embarcadero, and numerous open spaces along the Piers to Candlestick Point State Recreation Area.

These open space opportunities should be enhanced and expanded by focusing on the development of several signature open spaces that draw people from their immediate neighborhoods and beyond. Key focus opportunities for developing new or enhanced signature open spaces on the waterfront are listed below by geographic area, and are identified in *Map 8: Blue Greenway*. Additionally, connecting these open spaces to the surrounding neighborhoods and throughout the City and region is an important goal and is discussed further in Policy 3.2.

**MAP 8 - Blue Greenway**

## Northeastern Shoreline

Significant progress has been made in opening and improving the city's northern shorelines. With the opening of Crissy Field in the Golden Gate National Recreation Area and the retention of much of the open space in the Presidio as publicly-accessible open space, this area has transformed itself into a regional destination. Long-term, maximizing the recreational opportunities of other shoreline areas should be considered and inter-governmental and other partnerships should be pursued to further develop these opportunities. At the same time, existing facilities should be maintained at a level good repair to assure their ongoing usefulness.

In addition, a major opportunity exists to create an expanded, multi-park open space at the juncture of Market Street and The Embarcadero. The existing open spaces of Embarcadero Promenade, Justin Herman Plaza, and Sue Bierman (formerly Ferry) Park provide a wealth of untapped opportunity, which can be connected to function as a coherent link from downtown to the Ferry Building and the waterfront, holding several linked yet distinct activity and recreation spaces. Additionally, the Port has opened the Northeast Wharf at Pier 27, which includes a three acre plaza in front of a new Cruise Terminal at the base of Telegraph Hill, and a series of linked open spaces in the heart of Fisherman's Wharf.

## Western Shoreline

The western shoreline has the advantage that it is already a long-stretch of natural and publicly-accessible open space. Ocean Beach is a national treasure and should be improved to acknowledge the significance of vast, unbroken expanse of beach in the City.

A non-binding Ocean Beach Master Plan has been developed by SPUR (a San Francisco non-profit supporting planning and good government in the Bay Area) in close coordination with responsible agencies. The Plan includes recommendations to improve and restore conditions at Ocean Beach by adapting proactively to the changing coastline. The western shoreline also connects to Lake Merced, providing opportunities for enhanced access to the waterfront and recreational opportunities. The SFPUC is undertaking several efforts, including implementing the Ocean Beach Climate Change Adaptation Project, to improve access to the watershed lands in this area. If additional space becomes available, this space should provide improved connections from the neighborhood to the waterfront.

# Southeastern Waterfront

The continued development of Mission Bay, the passage of the Eastern Neighborhoods plans (Mission, East SoMa, Showplace Square/Potrero Hill, and Central Waterfront Area Plans), the approved developments at Mission Rock, Pier 70, the Potrero Power Station, India Basin, and the proposed Candlestick Point and Hunters Point Shipyard developments will bring growth, which will require increased access and open spaces throughout the Southeast. Most of these plans are accompanied by specific open space strategies for parkland along the waterfront, where active water-oriented uses such as shoreline fishing, swimming, and boating should be promoted. The 2018 Central Waterfront: Dogpatch Public Realm Plan includes additional, more specific recommendations for the Central Waterfront-Dogpatch Public Realm Plan area.

### BLUE GREENWAY

The Blue Greenway is a project to improve and expand the public open space network along the City's central and southern waterfront, from the China Basin Channel to the San Francisco County Line (see *Map 8: Blue Greenway*). It provides a new vision of how parks and public spaces can be created to complement and connect with existing open spaces in this industrial mixed-use area along the Bay waterfront. The Blue Greenway seeks to both provide opportunities for much-needed open space that is easily accessible for exercise and recreation, including bicycle and pedestrian access, recreational uses in the water (e.g. kayaking and swimming), access to historical resources, and enjoyment of art, as well as improve waterfront public access from nearby neighborhoods. These goals realize objectives set forth in the Association of Bay Area Governments (ABAG) San Francisco Bay Trail Plan and Bay Area Water Trail for southeast San Francisco.

The following Blue Greenway projects should be given high priority as the neighborhoods along the Bay waterfront – which are already deficient in open space – continue to grow in population. These projects correspond with identified high needs areas. Some are longer-term, large-scale projects that will require public funding:

- **China Basin Shoreline Park:** This existing approximately two-acre park will be expanded as a part of the development of the Port's Sea Wall Lot 337 project and will be the northern gateway of the Blue Greenway.
- **Mission Bay Park System:** This 41-acre park system will include a large scale, bayfront park between the China Basin Shoreline Park and Pier 70, with an important Blue Greenway segment. These open space opportunities and projects are incorporated into the Office of Community Investment and Infrastructure's Mission Bay Redevelopment project.
- **Crane Cove Park:** This approximately seven-acre shoreline park within the Port's Pier 70 development area include construction of an aquatic center and interpretive educational information regarding the City's deeply rooted maritime history. In addition to Crane Cove Park, the Pier 70 site presents opportunities for a variety of other open spaces, all of which must be consistent with the industrial maritime character and setting of the site.
- **Pier 70 Development Project:** The waterfront development site is approximately 28 acres, which includes approximately nine acres of open space, including approximately four acres of open spaces along the waterfront that will incorporate historic shipbuilding infrastructure.
- **Potrero Power Station Development Project:** This approximately 23-acre parcel is the former site of the Potrero Power Plant, which is now planned for a major multi-phase mixed use development that will include significant amount of residential, office, laboratory, and other supportive uses. A major feature of the development is its 6.9 acres of waterfront and inland open space that will be coordinated with the adjacent Pier 70 multi-phase mixed-use development, as it provides an opportunity to extend waterfront access through the pier to Warm Water Cove.
- **Warm Water Cove:** This isolated park has the opportunity to be improved and expanded by up to three acres to provide access to the City's Eastern shoreline and to provide recreational opportunities to the growing population. The 2018 Central Waterfront-Dogpatch Public Realm Plan includes concept designs for this site to guide future expansion and enhancements.
- **Islais Creek Improvements:** This project may consist of shoreline improvements, including rebuilding dilapidated wharves, removing ghost piles, and providing for open space system linkages to expand public access and recreational water use of Islais Creek. In August 2021, the City and the Port published the Islais Creek Southeast Mobility Adaptation Strategy (ICSMAS), which examined the Creek and its surrounding neighborhood's flood hazard risks and identified a comprehensive suite of possible adaptation pathways to protect the area and its key public assets from flooding and permanent inundation.
- **India Basin:** The recently closed Hunters Point Power Plant and adjacent shoreline properties offers the opportunity to bring much-needed recreational space to the center of the City's southeast neighborhoods, helping address the health and environmental impacts of the plant's operations. Relatedly, RPD in embarking on a major redesign and enlargement of the India Basin Shoreline Park and India Basin Open Space that will, among other aspects, expand the area of the parks by incorporating new property at 900 Innes Avenue. The proposed India Basin multi-phase development, approved in 2018, will also contribute significant new open space area. Taken together, the new and improved open spaces from the Power Plant Site through India Basin and into the Shipyard are expected to create a network of diverse open spaces for the Bayview community and the City at large.

- **The former Hunters Point Shipyard, Candlestick Park and Candlestick State Recreation Area:** These areas form the southern terminus of the Blue Greenway. These open space opportunities and projects are incorporated into the Office of Community Investment and Infrastructure's Candlestick and Hunters Point Shipyard redevelopment project.

The City, including the SFRPD, the Port of San Francisco, and Office of Community Investment and Infrastructure, should continue ongoing planning efforts to improve connections and address any gaps amongst the various waterfront open spaces to create a linked system of parks that is consistent with the Blue Greenway planning efforts. In addition to signature open spaces, the City should consider new waterfront open space improvements that serve a non-recreational purpose, including climate change adaptive infrastructure. Current projections by the Pacific Institute predict that global warming may cause the ocean to rise as much as five and a half feet along California's coastline in the next 100 years, impacting many areas of the San Francisco Bay, including the shoreline areas, much of Mission Bay and adjacent portions of SoMa. Inclusion and restoration of open space, particularly tidal wetlands, can act as a natural buffer and play a key role in adapting to sea level rise. Wetlands can protect shorelines from storm surges while assisting in reducing carbon levels through sequestration, so wetland restoration and habitat enhancements should be considered for inclusion in all waterfront open spaces. While many of these areas are already developed, and therefore not appropriate for open space development at this time, ecosystem-based management principles and retrofits should be considered wherever possible to ensure that shoreline retreat and flood protection are considered as measures to assist in adapting to projected sea level rise.

### POLICY 2.5
### Encourage the development of region-serving open spaces in opportunity areas: Treasure Island, Yerba Buena Island, Candlestick and Hunters Point Shipyard.

Several large, underutilized sites within the City offer not only the opportunity for new mixed use development to meet the City's housing needs, but the chance to create new, large scale region-serving open spaces.

- **Treasure Island**, the former naval base just off the City's northeastern shoreline, is planned to reserve over 60% of its land area for open uses, ranging from parks and ball fields, to organic farms, to wetlands and tidal marsh. Combined with open spaces on contiguous **Yerba Buena Island**, its 290 acres of proposed open space will be planted with a diverse and healthy range of plants which will help offset the city's greenhouse gas emissions. As a part of the planning for the redevelopment of Treasure Island, a Habitat Management Plan was prepared to assure the protection and restoration of wildlife habitat and biodiversity on the adjacent Yerba Buena Island. It is critical that the final designs of open space on these two islands, taken together, provide not only a range of playgrounds and recreational areas to meet the new residents' activity needs, but also offer strong, permanent protections for their wetlands and natural habitat. Agriculture and biodiversity components of this Management Plan should be developed to serve as educational and cultural amenities for the City and the region.

- **Hunters Point Shipyard and Candlestick Point** are currently undergoing a transformation into a vibrant, urban neighborhood and livable green community. Candlestick Point currently consists of the 49ers stadium, parking lot and the Candlestick Point State Recreation Area, of which only about half is improved. Hunters Point Shipyard consists of a decommissioned Naval Shipyard currently undergoing remediation with very limited public access. Plans for the two areas call for a well-connected, full breadth of complimentary uses. A major feature of the project is the robust open space program including upwards of 325 acres of open space, roughly 220 acres of which is being developed at the Hunters Point Shipyard. While the plans call for some reconfiguration of the existing Candlestick Point State Recreation Area (CPSRA) as provided for by SB 792, the reconfiguration will help assure the full realization of currently underutilized portions of the State park. The waterfront open spaces within this project will be the southern section of the Blue Greenway.

Taken together, the new open spaces will enable a continuous Bay Trail along this southeastern portion of the City, and provide a wide range of shoreline-oriented recreational opportunities that could include boat launches, fishing piers, restored wetlands, picnic areas, and food services. The new open space system should be designed in coordination with the proposed adjacent new urban neighborhoods and improve connectivity to the Bayview community, greater San Francisco, and the rest of the region.

### POLICY 2.6
### Support the development of civic-serving open spaces.

San Francisco is a civic city— celebrations, rallies, gatherings and protests take place almost weekly; political speeches, music, performances in the open air are also common occurrences. Our identity is defined as much by expressions of our social and cultural goals as it is by our physical landscape. These regular events in San Francisco emphasize the role of our City as a regional stage where like minds can gather and deliberate.

San Francisco needs civic spaces which can accommodate these activities – weekly events like farmer's markets, annual events such as the Pride Celebration, and special events such as broadcasting presidential inaugurations. As the City grows, these spaces need to accommodate ever-larger crowds of people and different types of functions – from simple gatherings to technical showcases and wired events. The main opportunities to unify and bolster City landmarks and activity centers are focused around three major open spaces:

- **Civic Center:** Our existing Civic Center, surrounded by City Hall, the Main Library, the Asian Art Museum, and other civic spaces, hosts many of the activities described above. The Civic Center is part of the Civic Center Historic District with National, State, and Local designations. Civic Center's design, however, limits its capacity and functionality, with activities often spilling into less optimal public spaces such as nearby streets. The nearby UN Plaza provides additional activity space that is used for weekly farmers and craft markets, but the two spaces are generally underused outside of scheduled activities and are separated by a virtual parking lot along Fulton Street between Hyde and Larkin Streets. A series of connected open spaces, along a "Civic Center axis" from Market Street to City Hall, could be created with the development of a pedestrian mall along Fulton Street between the Main Library and Asian Art Museum, and with corresponding activity improvements to increase the usability of the Civic Center and UN Plazas. The Civic Center Public Realm Plan provides a blueprint for realizing these goals.

- **Embarcadero Open Spaces:** At the other end of Market Street, the numerous yet underutilized open spaces along the Embarcadero – Embarcadero Plaza, Justin Herman Plaza, and Sue Bierman Park- offer a glaring opportunity for synthesis into the City's gateway civic open space. Inspiration can be found in Millennium and Grant Parks in Chicago. Just as they serve as Chicago's front door, San Francisco needs a civic space for large outdoor events – a place where arrivals can be greeted by the vibrancy of the City, and where its citizens can gather for moments of great joy or great mourning. A series of linked outdoor "rooms" would enable the reconnection of Market Street to the Ferry Building, enhance visual connections to the Bay, activate public space edges with uses that draw people to inhabit and use the space, and create a series of distinct activity spaces for civic and news events, large gatherings, and performance space.

- **Market Street:** Market Street, San Francisco's premier street and most important destination, is more than the city's primary corridor for Downtown movement; it also acts as a civic and cultural center where people can gather to see, learn and participate in our city's vibrant life. The Better Market Street initiative is currently underway to enhance public life along Market Street with a memorable and active identity; more diverse range of social, cultural, and economic activities; and with more gathering spaces to visit, promenade and linger. These changes will complement the transit and bicycling improvements that are also an integral part of Better Market Street

- **Hallidie Plaza:** Hallidie Plaza is a prominent San Francisco public space. Many more people visit Hallidie Plaza every day than any other plaza in San Francisco because of its proximity to shopping, hotels, and theatres. Despite these attractive qualities, Hallidie Plaza has never met its potential to be a world-renowned space where residents and visitors alike come to meet. The multi-level design fractures the plaza, making it impossible to create a place at street-level that can accommodate any sort of meeting space. The Better Market Street Project included preliminary designs for Hallidie to suggest different directions the City could go. Further, there were several conceptual designs developed in the early 2000s that highlighted preferred elements for the plaza, but no definitive design. These should be used as the basis for a design competition, hosted by the Planning Department.

  Given the financial constraints San Francisco will continue to experience for the foreseeable future and the anticipated cost of fixing Hallidie Plaza, there will need to be a public-private partnership that brings philanthropic funding to match City contributions. Building the partnerships necessary to support the refurbishment of Hallidie Plaza should remain a high priority for the City so that the space can become a destination with iconic value to both San Franciscans and our many national and international visitors.

### POLICY 2.7
### Expand partnerships among open space agencies, transit agencies, private sector and nonprofit institutions to acquire and develop new open space, and maintain, improve, and manage existing open spaces.

Public agencies and private organizations and individuals are working to maintain open space in the Bay Area. These bodies include the Federal Government, the State of California, local governments, several sub-regional open space agencies, as well as public nonprofit organizations and private landholders. Preserving a regional open space system is beyond the scope of the seventy-odd local governments in the nine-county Bay Area. Valuable open spaces cross city and county lines and individual municipalities have neither the regulatory powers nor the funds to retain them. Preservation of such spaces will depend upon regional action.

The City should facilitate efforts of existing agencies and organizations working toward regional open space goals. The City should encourage and work with these groups to secure additional land for open space retention and management, and to maintain existing open space areas in their current undeveloped open space status. The City should also support use of selected areas of open space lands within its jurisdiction for appropriate recreational uses.

### POLICY 2.8
### Consider repurposing underutilized City-owned properties as open space and recreational facilities.

All major metropolitan areas face challenges in providing sufficient open space due to lack of available land. While vacant or underutilized sites may be found, they are in high demand for private commercial or residential development, driving competitive land prices which are often too expensive for public acquisition. In order to meet the City's need for new open spaces in these high needs areas, the City should creatively look at the resources it already has – sites already in public ownership.

**Surplus Sites:** Occasionally public agencies find some land surplus to their current and projected needs. When public land becomes surplus to one public use, San Francisco's Surplus Property Ordinance, passed in May 2004, requires the city's surplus property be considered for affordable housing. Some such parcels are not feasible for housing because of their size or shape. When surplus land is already zoned for open space, open space should take priority over other public uses, including housing. When other surplus land becomes available for review as open space, the City should evaluate its suitability as a park site based on suitability criteria described in Policy 2.1 and in RPD's Acquisition Policy while considering other public benefits the land could provide. If the analysis finds the property necessary for open space usage, the City should consider if and how to transfer the property to the Recreation and Park Department under the procedures determined in SFRPD's Acquisition Policy for jurisdictional transfers.

**Publicly Owned Sites:** The City should evaluate all publicly-owned sites in high needs areas (see summary *Map 7: High Needs Areas: Priority Renovation & Acquisition Areas*) to determine their feasibility for full or partial park site usage. Some of these sites may be underutilized and therefore available for purchase or swap—these should be reviewed for potential transfer to or purchase by RPD. Other sites may be currently utilized for valuable public purposes, but could offer opportunities for joint use. For example, public parking lots that are underutilized on weekends could serve as active recreational spaces during off-business hours, and could even be improved with reinforced turf systems that create greened parking areas. Public buildings could be evaluated for their potential to provide active roof space, which could be creatively developed as green spaces accessible to the public during certain hours.

The opportunity to create open spaces on neglected or overlooked city owned parcels should be explored, particularly in high needs areas – such designs could repurpose existing infrastructure in unique and exciting ways. For example, the award-winning Gas Works Park in Seattle is built on a former coal plant site. More recently in New York City, an abandoned elevated rail track was redesigned as the High Line park, a wildly successful public space that drew over two million visitors in its first year and earned several design excellence awards. The City should consider the innovative reuse of abandoned, vacant or excess city owned land of all shapes and sizes.

Public Rights Of Way: As described in Policy 3.1 below, numerous streets, alleys, schoolyards, and other rights of way offer potential for cooperative recreational use. City departments and State agencies, such as the Municipal Transportation Agency and Caltrans, own and operate spaces that could be better utilized to serve as open spaces throughout the city. Spaces under freeways could serve as skate parks and bicycle paths, while city-owned parking lots could be developed as open space.

### POLICY 2.9
### Address physical and bureaucratic barriers to opening schoolyards as community open space during non-school hours.

During school hours, schoolyards provide students with a space to learn, socialize, exercise and play. They also often provide the greatest expanse of open space available in their immediate neighborhood. But if the neighborhood cannot tap into that resource when the school day is over, the schoolyard becomes a lost opportunity for half its life. Opening these spaces for use during these times could provide much needed additional space in areas that are currently deficient in open space. This could prove mutually beneficial in that it could provide additional revenue for the school district and large new open spaces for residents without the high costs of acquiring new spaces.

In 2008, the San Francisco Unified School District (SFUSD) and the City launched a pilot program which opened eleven school yards to neighborhoods during weekend hours. This program has been successful in increasing community access to recreational space without any corresponding significant damage to school property. The program has continued to expand, to 21 schools in total, and offers many benefits to participating schools, such as open space improvements, grants to support physical education, gardening activities during the school day, and an activity fund to provide weekend activities open to the public. Schools receive maintenance, programming, and surveillance support from San Francisco Department of Public Works, San Francisco Recreation & Parks Department, and the San Francisco Police Department.

The City should consider ways to better market the availability of these spaces through multi-language signage and events in the space. Continued efforts to add greening to schoolyards would provide benefits to students as well as the neighborhood. As the program continues to expand, additional funding may be needed to address staffing, programming, and operational needs that come along with any joint use project. In addition, based on lessons learned from joint-use agreements thus far, the city should review and further codify the structure of its joint-use agreements to ensure consistency and ease of implementation.

The lessons from this pilot project could also be applied to other public or quasi-public sites. For example, as a next step the City could look at small branch libraries or child care centers as opportunities for increasing public access. The City should also approach private schools throughout the City and attempt to gain their support for such a program on their properties. Other cities have successfully established mutually beneficial joint use or development agreements that opened the privately-owned open space to the public. Private schools could use this vehicle as a way to be "good neighbors" that contribute to neighborhood needs, similar to private recreational facilities offering neighborhood discounts. Where liability is an issue, the City should look to equitably share liability with private entities or among multiple agencies.

### POLICY 2.10
### Improve access to and level of activity provided at San Francisco reservoirs.

The San Francisco Public Utilities Commission (SFPUC) owns and manages a significant amount of open space lands in San Francisco, as well as sites in Alameda, Santa Clara and San Mateo Counties. These lands are managed as watershed lands and serve as the city's major water source; in some cases these sites also serve as open spaces with scenic easements, and have recreational features such as playgrounds, walking paths, seating areas and even golf courses. The SFPUC has recently expanded uses on its lands to include sustainable agriculture and composting.

Because of the SFPUC's mission to protect public health and safety by ensuring water quality and the filtration capability of the existing system, these sites need to be carefully managed, and in some cases large-scale public recreational use is not possible given such constraints. However, increased public access to portions of its watershed lands with high recreational value is still possible, particularly on certain opportunity sites where the water quality would not be threatened.

Several of the SFPUC's treatment, tank or station sites may offer the potential to yield limited right-of-ways connecting proposed trails or greenways discussed elsewhere in this Element. Such connections, however, must be limited to pedestrian crossings, and made with consideration of safety of the underlying substructure and whether there is risk of potential degradation.

Future leases and lease renewals on watershed lands should be consistent with protection of existing natural values. Watershed lands should be managed to limit potential fire and erosion hazards. Access should be consistent with the legal rights of existing tenants, and with the intent of existing scenic and recreational easements.

The SFPUC should seek to increase public access to and enjoyment of surplus sites by seeking funding for site improvements, better access, and the ability to address safety issues at existing and potential open space properties.

In the case of reservoir lands outside of the City and County of San Francisco, the SFPUC has several long-standing agreements for the recreational, educational and agricultural use of its lands. These agreements have gone through extensive public processes and any change to the agreements would involve additional outreach and review. Some examples of successful joint-use of SFPUC lands include: Sawyer Camp Trail, one of the most popular trails in San Mateo County, which is located inside the Peninsula watershed and passes by the reservoir; and the Sunol Water Temple AgPark, an urban farm located on SFPUC land in Alameda County.



**MAP 9 - School Yards & SFPUC Sites With Open Space Potential**

**POLICY 2.11**

**Assure that privately developed residential open spaces are usable, beautiful, and environmentally sustainable.**

In order to improve living conditions in each residential building and the quality of environment in San Francisco as a whole, the City should continue to require that all new residential development provide outdoor open space. Current San Francisco Planning code requires a minimum amount of open space and this minimum must be maintained. However, open spaces should not only meet a minimum size requirement but should also be usable, quality recreational opportunities directly outside residents' front door, and they should also supplement any public open space that is provided nearby.

In single-family districts, rear yards are required and these yards provide much-needed open space for use by residents, natural habitat value, as well as stormwater management benefits. In most multi-family zoning districts, a minimum of 60-125 square feet per unit is required. In some areas such as Downtown, Chinatown, and high-density residential zoning districts, minimum open space requirements can dip as low as 36 square feet per unit. This requirement is too low, especially for areas that correspond with the high needs areas in *Map 7*. Comprehensive planning in these areas should consider if the requirements should be increased or how open space needs can be met with alternative methods.

In multi-unit developments, providing required open space as common space has many benefits. It provides a collective place for residents to gather, allowing residents to get to know their neighbors and fostering a sense of community. It also provides larger areas for explorative play for children, something small balconies and private spaces usually cannot provide. Finally, it can be more space-efficient than providing numerous smaller spaces, especially if placed on rooftops or adjacent to common entry points where space for access is already required. Common open spaces can expand these benefits to the broader neighborhood as well, if they are publicly accessible during safe times of the day, such as daylight hours, or if they contribute to scenery by being visible from the street. Therefore, open space requirements should include incentives to promote the provision of common open space, and publicly accessible common open space in particular.

The value of private open spaces rests largely on their design. Open spaces should be designed to relate to the type of development they support; while lower density districts may typically include ground level or rear yard gardens, higher density residential development can include not only rear yards or common courtyards at grade level, but also balcony, terrace and rooftop open space. Whatever type of open space is provided, it should be usable with landscaped areas that add greenery. Elements such as playground equipment, lawns, and gardens should be considered as well, based on the expected resident population of the project. Appropriate minimum amounts of open space and guidelines should be developed to codify these recommendations.

Open space in the downtown urban core is already very limited, and continued development will make meeting these higher requirements both more challenging and more necessary in order to maintain livability. Rooftop open spaces can provide a promising way to meet this challenge. Aside from the environmental benefits of roof greening – reduction of stormwater runoff, improvement in air quality, and reduction in energy used for building heating and cooling – green roofs can help to meet a number of the City's open space goals, from recreational enjoyment, to aesthetic improvement and greening of urban landscapes, to increased local food production and increased biodiversity. To enable quality roof space that provides these benefits, roofs should be constructed with load bearing capacity that can accommodate minimum soil depths for planting, or should at minimum support expected person occupancy and potted plantings. Design considerations also include safety, how the space overlooks neighboring properties, and where access can be provided.

### POLICY 2.12
### Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed–use development areas and ensure that spaces are truly accessible, functional and activated.

In denser neighborhoods of the City, Privately-owned Public Open Spaces (POPOS) are a critical strategy to promote livability and provide much-needed spaces for relaxation, enjoyment of greenery, and socializing with others.

POPOS have been provided in a wide range of forms including outdoor seating with landscaping, to beautiful rooftop terraces, or indoor atriums. The quality of these spaces varies greatly, with some of them providing true oases with trees and planters and ample seating; while others are dark, tucked-away spaces that are accessible in name only. While this type of space can never replace true public open space, these spaces should be accessible to the public and should provide features to create a functional and pleasant open space. The City should deploy a variety of tools to educate the public of the existence of POPOS, especially in cases where such spaces are tucked away from the sidewalks—located on the building's rooftops or on the back of the building. The City should enforce all violations by existing POPOS, ensuring that they meet the conditions they were required to meet when the development was approved. The City should also reevaluate the guidelines provided in the Downtown Plan for required features of each type of POPOS, including seating, access to public restrooms, landscaping, and ecological functionality, to determine how to improve these open spaces. Additionally, the City should consider ways of allowing increased activation of the space and provide quality bicycle connections to these spaces.

POPOS have traditionally served the denser downtown core, a result of policies adopted in the 1980s mandating that new large commercial developments provide publicly-accessible open space. These policies should be evaluated to determine how POPOS requirements can be strengthened and expanded citywide. For instance, fee requirements could be extended to all types of development projects of a certain size (not just commercial uses) and provide an in-lieu fee option, as is the case in the Transit Center District Area Plan. Similarly, the Eastern Neighborhoods plan allows developers to satisfy some portion of private open space requirements by providing publicly accessible open spaces. Moving forward, POPOS requirements should ensure that such open spaces are designed and maintained to accommodate and attract a diverse range of users.

## OBJECTIVE 3
## IMPROVE ACCESS AND CONNECTIVITY TO OPEN SPACE

San Francisco is a dense, built-out city, where it may be difficult and expensive to acquire new land for parks and open spaces. Even though acquisition remains an important means to improve open space access, San Francisco's street network provides an untapped opportunity to supplement the city's open space system and link the network of open spaces. The street network, which makes up 25% percent of the City's total land area, is a valuable public space asset that can incorporate many types of open spaces, such as pocket parks, play streets, trails, and walkable streets and bike routes. These systems can connect residents to larger parks and open spaces and serve as restorative green spaces in their own right, places where residents can interact with urban nature on their doorstep. This system should be clearly legible, and include signage to guide pedestrians to and through the larger open space system.

### POLICY 3.1
### Creatively develop existing publicly-owned right-of-ways and streets into open space.

San Francisco's right-of-ways offer a variety of opportunities for developing open spaces. Streets can supplement traditional open spaces with standard streetscaping improvements such as bulb-outs, crosswalk improvements, tree planting, and pedestrian lighting. More extensive traffic calming on expanded or existing wide sidewalks can create additional pocket parks, sitting areas, and opportunities for sustainable plantings, community gardens, stormwater treatment, and other landscape elements.

#### *Green Connections*

Green Connections are special streets and paths that connect people to parks, open spaces, and the waterfront, while enhancing the ecology of the street environment. By increasing greening in the right-of-way with street trees, sidewalk gardens, and other landscaped areas, these streets will become sustainable corridors that enhance mobility, green neighborhood streets, and improve pedestrian and bicycle access to community amenities and recreational opportunities.

#### *Living Alleys*

The City's network of alleyways– small-scale, quieter streets that primarily serve vehicles needing access to adjacent properties—can provide vibrant open spaces, especially in dense neighborhoods. Some alleys, such as Belden Place in the financial district, are currently closed to traffic and provide an intimate atmosphere where patrons of adjacent restaurants can enjoy outside dining amidst a bustling urban environment. Other alleys, such as Maiden Lane, are closed during certain times of the day, serving adjacent businesses during the day, but allowing deliveries during the evening hours. Still other alleys, such as Linden Alley, are open to traffic, but carefully designed to ensure that drivers proceed slowly and with caution. These alleys are designed with seating, landscaping, and pedestrian-scale lighting to create useable and attractive open spaces. All three alley types should be considered and encouraged.

In some residential neighborhoods in the City, such as Visitacion Valley, Mission Terrace, Crocker Amazon and Bayview Hunters Point, there are narrow, unpaved alleyways that originally provided service vehicle access before paved roads were built. These abandoned and overgrown spaces can provide much-needed spaces that supplement the traditional open space, potentially providing walking and biking paths, or seating, landscaping, and lighting appropriate to the area. Using the City's Better Streets Plan, the design for the different types of alleys can be implemented. The City should study different neighborhood needs and determine a priority plan for creating living alleys in areas most in need of these improvements.

### *Living Streets*

Living Streets are wider streets where sidewalks are expanded into excess right-of-way to accommodate formal open spaces or linear parks. Wide streets that have excess right-of-way provide an opportunity to develop living streets, especially where dense residential developments are being built. Many of these areas are deficient in open space, and the streets should be designed with places for relaxation, recreation, and neighborhood gatherings.

### *Enhancing Existing Parkways*

Parkways are streets with broad, well-landscaped medians and sidewalks that provide recreational paths while moving bikes and vehicles. These streets function not only as transportation corridors, but also as linear parks, creating a green network. This green space can often be effectively used for pedestrian and open space functions, by providing multi-use trails, seating, and open spaces. They can also perform ecological functions, including stormwater runoff retention and infiltration and creating habitat. Two of the existing parkways, Park Presidio Boulevard and Sunset Boulevard, offer a major opportunity to enhance the north-south connections from Golden Gate Park. These streets already provide ample trails and open space, but are in need of overall care, improved crossings, and enhancement. By utilizing the existing open spaces offered by these parkways, the City is focusing on how to make the most of what we have. The City should develop a specific design program to address the enhancement of these two parkways.

### *Temporary and Permanent Street Closures*

The City's Sunday Streets program – which was modeled on a 25-year program in Bogota, Colombia – has been a huge success. The proposal began in 2008 with the idea to close one street to cars on Sunday mornings so people can get out and be active in a car-free space. The program has since expanded to offer more opportunities for temporary public gathering spaces. Additionally, City agencies' collaborative effort to transform excess pavement into public spaces is on-going and several projects are being initiated around the city. This concept of temporary or even permanent street closures in the City presents a great opportunity to take advantage of existing street rights-of-way to create space for people to walk or ride their bike.

See *Map 3: Existing and Proposed Open Space* for more information on existing and proposed green street concepts.

## POLICY 3.2

**Establish and Implement a network of Green Connections that increases access to parks, open spaces, and the waterfront.**

Despite San Francisco's many open space assets, park accessibility can be a challenge, particularly for those on bike or foot. For decades, streets have been built to maximize car volume and speed, resulting in roads with fast-moving traffic, inadequate pedestrian and bicycle facilities, and other barriers can that make it difficult and unpleasant for people to walk, bike and use other forms of active transportation.

In recent years, San Francisco has made great strides in retrofitting streets with pedestrian and bicycle improvements that make it easier to access parks, schools and other neighborhood destinations. Green Connections builds on this work, envisioning a 115-mile network of safe, functional, and attractive streets connecting people to parks, open spaces, and the waterfront. Green Connections is designed to meet three goals:

- Public Health: Increase park access
- Sustainability: Enhance urban ecology
- Livability: Support neighborhood stewardship and placemaking

Routes on the Green Connections network should significantly calm traffic, prioritize pedestrian and bicycle travel, enhance urban ecology and ecoliteracy, include beautification and artwork, and provide opportunities to gather and play. Routes will also be designed to be consistent with the Better Streets Plan, which creates a unified set of standards, guidelines, and implementation strategies to govern how the City designs, builds, and maintains its pedestrian environment to ensure streets contribute to a gracious public realm.

Green Connections will not create a new City program, rather, it calls for coordinating existing initiatives such as traffic calming and stormwater management, with the goal of creating a cohesive network of improved neighborhood walking and bicycling routes over the next twenty years. The scale of the network creates opportunities to coordinate with city projects and private development. Additionally, community members and neighborhood groups will play an important role in the Network's implementation and stewardship.

See *Map 10: Green Connections Network*.

**MAP 10 - Green Connections Network**

**POLICY 3.3**

**Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering restoring historic water courses to improve stormwater management.**

San Francisco currently has an extensive network of trails that provide local opportunities for walking and biking and link to regional trails and open spaces throughout the Bay Area. These trails surround the Bay, parallel the ocean, extend through parks and neighborhoods and connect existing open spaces. Many of these trails have gaps and lack adequate signage. The City should prioritize filling these gaps and increasing awareness of the trails through updated signage. New trails are also envisioned to provide additional hiking and biking opportunities and important wildlife corridors. The City should also work with Daly City and San Mateo County to encourage better links to San Bruno Mountain and trails to the south.

New trails throughout the city could consider historic water courses to incorporate stormwater management, provide trail connections, or restore aquatic and riparian habitats or wildlife corridors. These trails should provide better ways to move people through increased hiking and biking opportunities. Some adopted Area Plans, such as the Glen Park Area Plan, have identified such opportunities.

**MAP 11 - San Francisco Bay Trail**

## Continuous Waterfront Trail

The trails along the waterfront are administered by many different jurisdictions including regional, city, and federal agencies. However, visitors do not necessarily distinguish between these jurisdictions, and want a continuous, usable trail system along the waterfront. The City should improve trail signage to ensure users are provided clear routes and destinations and work to fill any gaps in the proposed trails and in the connections between them where it does not impede on water dependent commerce.

***Bay Trail***

The Bay Trail is a regional trail developed by the Association of Bay Area Governments (ABAG) that is proposed to surround the entire San Francisco Bay. In San Francisco, this trail would extend from the Golden Gate Bridge along the bay to the Central Waterfront neighborhood, where the trail is being built inland along Illinois Street through Pier 70 (which, along with the Power Plant site, will eventually provide opportunities for waterfront access). The Bay Trail will eventually continue around the Bay through Hunters Point Shipyard and down to San Mateo. (See *Map 11: San Francisco Bay Trail*.) The gaps are shown in *Map 11* and the City should prioritize closing these gaps to ensure a complete Bay Trail. Closing the Bay Trail gaps would also help in the development of the Blue Greenway, a continuous corridor that links the existing and proposed open spaces through the Bay Trail and the San Francisco Water Trail. The City's Blue Greenway project intends to complete San Francisco's southeast section of the Bay Trail and that portion of the Bay Area Water Trail, described below.

***Coastal Trail***

The California Coastal Trail is a network of trails for walkers, bikers, equestrians, wheelchair riders, and others along the entire 1,200 miles of the California coast. Through San Francisco the 10.5 mile trail connects many scenic and tourist attractions along the coastline, including the Golden Gate Bridge, the Presidio, Ocean Beach and Fort Funston. While the current trail is relatively complete, prioritizing improvements such as signage and fixing small gaps would ensure that the trail is accessible and visible for its entire route.

***Bay Area Water Trail***

The State Coastal Conservancy is leading the implementation of the San Francisco Bay Area Water Trail Plan (Water Trail Plan), a new regional access project. The Water Trail is a network of access sites (or "trailheads") that will enable people using non-motorized, small boats or other beachable sailcraft—such as kayaks, canoes, dragon boats, stand-up paddle and windsurf boards—to safely enjoy single and multiple-day trips around San Francisco Bay. This regional trail enhances Bay Area communities' connections to the Bay for water recreation activities, and creates new linkages to existing shoreline open space and other regional trails, such as the Bay Trail. The Water Trail will include educational, stewardship, and outreach components.

***The Bay Area Ridge Trail***

The Bay Area Ridge Trail is a multi-use trail that links the hills and ridges of the nine counties of the Bay Area. It will be approximately 550 miles in length when completed. Most of the 13.5-mile portion of the trail in San Francisco was completed in 1992 and is in the process of being reevaluated by the Bay Area Ridge Trail Council, with the goal of improving its route, signage and connections to other city and regional trails. The City should work with the Council and the community in this rerouting effort, especially one that takes users through parks and makes connections to other trails, such as the Bay Trail, the Coastal Trail, and the proposed new cross-town corridor described below. The City should also assist the Ridge Trail Council in its efforts to improve signage along the route. *See Map 12: Regional Trails*.

**MAP 12 - Regional Trails**

# New Cross-Town Corridor

A proposed corridor would connect wildlife habitats and allow hikers an urban wildlife trail experience through some of the City's most diverse natural areas. The corridor would begin in the Presidio, travel through Golden Gate Park, stop at Twin Peaks and Mt. Sutro, wind through Glen Park Canyon, then McLaren Park, and finally reach the San Francisco Bay in Candlestick Point Recreation Area. While the exact route of this proposed new corridor has yet to be determined, it could include an extension to connect with Lake Merced and opportunities to daylight historic creeks in an enhanced green corridor. The City should work with pertinent Federal, State, and local agencies along with the community to develop this new corridor.

**POLICY 3.4**

**Encourage non-auto modes of transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces.**

San Francisco's transit first policy, adopted by the Board of Supervisors as Section 8A.115 in the San Francisco Charter, emphasizes the importance of providing and prioritizing transportation via transit, walking, and bicycling for all trips in the city including to parks and open spaces. Non-auto transportation is especially important because many of the City's large parks are located far from dense population centers and high needs areas. While the City's extensive network of transit allows users to access all of the City's parks, crossing the City, especially on a weekend, can often entail multiple transfers and long waits because of less frequent service. The City should consider increased and/or express local bus service to major open space amenities particularly from high needs areas. The City should also explore the idea of a "Green Transit Program," a bus that delivers riders from the City's high needs areas to large parks. This service should be affordable and allow families an easy way to access the City's large open spaces. Additionally, the City should improve transit access to regional open spaces outside of San Francisco such as Marine Headlands, Mount Tam, Pacifica beaches, and the San Bruno Mountains.

Bicycle routes that serve to get riders to and around our open spaces also provide a key component of the city's non-auto transportation network. Many of the improvements in the City's Bicycle Plan address the need to connect people to open spaces. The City should prioritize bicycle improvements that provide both a connection to the City's open spaces and serve as the most heavily utilized routes. For example, the improvements suggested along the panhandle would improve access to the Panhandle and Golden Gate Park as well as facilitate this route as a commuter corridor for bicyclists. The City should also work to provide bicycle parking at entrances to park facilities and throughout large open spaces to promote increased bicycle usage. In August 2013, the Bay Area BikeShare was launched with 34 San Francisco locations. The City should consider expanding those locations to serve major parks and open spaces, like Golden Gate Park, that are on the City's bike network.

Heavy or fast traffic in and around public open spaces endangers pedestrians, limits access to open space, endangers plant and animal life and makes the open space less enjoyable to be in. Excessive parking spoils the user experience and untimed parking encourages non-park users to park, restricting availability of spaces for park visitors and residents alike. The following methods of reducing traffic in and around public open space are consistent with the urban design and transportation elements of the General Plan and should be applied where possible:

- Consider eliminating some roadway cut-throughs and ensure new roads are necessary for park access, not only as through-ways.
- Increase traffic calming on roads. Reduce the capacity of roads in public open spaces to encourage slower travel and provide safer routes for pedestrian and bicycle travel.
- Establish strict speed limits. Monitor speeds throughout the parks and ensure that strict speed limits are enforced.
- Study and implement, where appropriate, timed parking that supports typical-length visits to a park, but discourages all-day parking during the week.

### POLICY 3.5

**Ensure that, where feasible, recreational facilities and open spaces are physically accessible, especially for those with limited mobility.**

The City should ensure that recreational facilities and public open spaces are accessible to all San Franciscans, including persons with special recreational needs, where feasible. For example, the hilly topography of the City makes providing some paths ADA accessible difficult to achieve. People with special needs may include seniors, children (particularly the very young), and people with disabilities. In order to achieve this policy, park and recreation facilities should be planned and programmed for people with special recreational needs in mind. The following criteria should be followed when developing or renovating any new space:

- All parks and open spaces should comply with applicable requirements of the Americans with Disabilities Act and the California Building Code.
- The City should utilize the US Access Board's recreation facilities and outdoor area accessibility guidelines as a best practice for design and construction.
- The City should also ensure that routes to and from the open spaces are accessible. For example, the route from the public transit stop to the park should be fully accessible.

### POLICY 3.6

**Maintain, restore, expand and fund the urban forest.**

Trees and understory plantings in city parks, developed public open spaces, city streets and private property collectively form the urban forest. The urban forest contributes substantially to our quality of life and to the ecological functioning of our city. Trees and landscaping soften the urban environment, provide habitat, improve air quality, absorb carbon and mitigate stormwater runoff. Given these benefits, trees are an essential piece of the City's infrastructure. The urban forest requires consistent maintenance, funding and long-term planning to ensure its health and growth over time.

The SFRPD plants and maintains a variety of landscaping, including approximately 131,000 trees in city parks and other SFRPD open spaces. The Department of Public Works, Bureau of Urban Forestry (BUF) has permit jurisdiction over 105,000 trees and landscaping in the public right-of-way and provides maintenance along designated streets. Finally, property owners maintain trees within their property line as well as street trees and landscaping along their street frontage on streets not maintained by BUF.

The Planning Department, in collaboration with the Department of Public Works, has created a plan to promote San Francisco's urban forest with a focus on street trees. The Urban Forest Plan – Phase 1: Street Trees (2014), adopted here by reference, identifies policies and strategies to proactively manage, grow and protect the City's street tree population. A corresponding planning effort is needed, focused on policies and recommendations pertaining to trees in parks and open spaces. The Urban Forest Plan - Phase 2: Trees in Parks & Open Spaces should be funded and carried out. Many of the city's trees and understory plantings in our parks have reached maturity and are in a state of degradation. A thorough tree replanting strategy in parks and open spaces that addresses not only hazardous trees, but also develops a comprehensive replanting strategy that includes a system-wide prioritization framework, should be pursued. In addition, a third phase of urban forestry planning (Urban Forest Plan - Phase 3: Buildings and Private Property)should be completed to present recommendations for trees and landscaping on private property as well as on building (i.e. living architecture, green roofs and walls). The completion of all three planning phases will produce a holistic vision for the City's urban forest.

Urban forestry planning in San Francisco requires a Citywide Street Tree Inventory and Parks Tree Assessment to gather the data needed to achieve a higher level of tree management and care. The Citywide Tree Inventory should include geographic location, tree species, size, age, and disease classes, and other related information for trees within the public right-of-way. A Parks Tree Assessment should evaluate the condition and needs of trees under SFRPD's maintenance purview. Upon completion of these studies, property owners should be encouraged to plant trees and landscaping fronting their property consistent with the City's Urban Forest Plan and DPW's tree and landscaping planting guidelines. Additionally, the City should seek long-term funding sources to maintain and expand the urban forest on streets and parks. Codes relating to planting and maintaining street trees and landscaping in public spaces, parks, along public right-of-ways and within private property should be rigorously enforced to in order to maximize the extent, health, and longevity of the City's urban forest.

## OBJECTIVE 4

## PROTECT AND ENHANCE THE BIODIVERSITY, HABITAT VALUE, AND ECOLOGICAL INTEGRITY OF OPEN SPACES AND ENCOURAGE SUSTAINABLE PRACTICES IN THE DESIGN AND MANAGEMENT OF OUR OPEN SPACE SYSTEM

San Francisco is a heavily urbanized city, which nonetheless has a rich variety of plant and animal communities. Among these are coastal scrub, grassland, oak woodlands, marsh, and stream-side habitats and their associated wildlife. Some of these habitats hold species found nowhere outside of the Bay Area. The City also has significant landscaped areas, such as conifer plantings in Golden

Gate Park. By providing food and shelter for migratory and resident birds, butterflies, and insects they too play a major role in supporting San Francisco's biodiversity. Biodiversity includes the variety of living organisms, the genetic differences among them, and the communities and ecosystems in which they occur. Maintaining biodiversity requires genetic diversity, species diversity, and habitat diversity. San Francisco can be a leader in creating new and more sustainable open spaces by ensuring that all open spaces, including new and renovated park spaces, are developed in a way that enhances and works with local biodiversity.

### POLICY 4.1
### Preserve, protect and restore local biodiversity.

San Francisco's ecological communities include freshwater and tidal wetlands, riparian areas, grasslands, coastal prairies, oak woodlands, coastal scrub, dunes, rock outcroppings and our designed landscapes. Some of these areas serve as habitat for unique species including many rare and endangered species, such as the red-legged frog, snowy plover, and mission blue butterfly. Yet San Francisco continues to lose species diversity due to isolation and fragmentation of habitats and invasive species.

Parks and open spaces in San Francisco include both native and non-native species, both of which can contribute to local biodiversity. The City should employ appropriate management practices to maintain a healthy and resilient ecosystem which preserves and protects plant and wildlife habitat, especially rare species which are the primary contributors to local biodiversity.

Restoring some ecosystems would also help enhance local biodiversity. Wetlands and riparian areas, for example, provide habitat, biological benefits, and resource-efficient methods for treating storm water runoff in addition to serving recreational uses. However, many of San Francisco's wetlands have been buried by development and little of the original wetlands have survived in San Francisco. A number of restoration projects have recently been completed or are underway, including projects at Crissy Field, Heron's Head, Pier 94, Mountain Lake and Lake Merced. The City should continue to support the monitoring and restoration of these wetlands.

The long-term vision for the City should also include conserving and restoring hydrological resources, including riparian communities, seeps, springs, creeks, ponds, and lakes; and exploring the feasibility of day lighting creeks that are completely or partially buried, for example Islais Creek, Yosemite Creek and Mission Creek. In order to ensure the preservation and restoration of our local biodiversity, the City should increase awareness of the benefits of all ecological communities as well as how the public should and should not interact with these areas.

### POLICY 4.2
### Establish a coordinated management approach for designation and protection of natural areas and watershed lands.

San Francisco's natural areas are the undeveloped remnants of the historical landscape which contain rich and diverse plant and animal communities. Following the adoption of the 1986 Recreation and Open Space Element, the SFRPD exacted policies to develop a Natural Areas Program to manage the 530 acres of parks and portions of parks that constitute natural areas. The mission of the program is to restore and enhance remnant natural areas and to develop and support community-based stewardship of these areas. Policies governing access and appropriate use and enjoyment of protected natural areas should ensure that the natural resource values are not diminished or negatively affected by public use.

In addition to the SFRPD-owned land, there are a number of natural areas under the jurisdiction of other city, state and federal agencies and in private ownership. The long-term ownership and management of these lands is uncertain because these properties are not under rules and restrictions that would prevent them from being sold and/or developed. The City should ensure that a comprehensive inventory of all natural areas owned by city agencies other than the Recreation and Park Department and by private landholders is developed, in order to preserve the City's biodiversity and natural areas more holistically. This inventory should include promoting habitat corridors among open spaces and natural areas. The following criteria should be used to determine what constitutes a significant natural resource area worthy of protection:

- The site is undeveloped and relatively undisturbed, and is a remnant of the original natural landscape and either supports a significant, diverse, or unusual indigenous plant or wildlife habitat, or contains rare geological formations, or riparian zones.
- The site contains rare, threatened, or endangered species, as identified by the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife, or contains habitat that has recently supported and is likely again to support rare, threatened, or endangered species.
- The site is adjacent to another protected natural resource area and, if protected from development, the two areas together would support a larger or more diverse natural habitat.

Given constraints on the City's financial resources, public acquisition for all natural areas that are in private ownership may not be an option. However, if such an area is at risk of loss through development, the site should be examined as a candidate for open space acquisition. Relative importance of the site as a natural area should also be assessed. If the area is not to be publicly acquired, the Planning Commission may require any development that is approved on the site to preserve the most important portions of the area, if found feasible and consistent with the Planning Code.

Once the significant natural resources outside the jurisdiction of RPD are identified, the City should develop a management plan for these natural areas. Many of the properties are currently managed by the City, State or Federal agencies whose mission is not consistent with the preservation of natural areas. In these cases, consideration should be given to joint management through a conservation district or a governmental entity that controls the management of these areas.

### POLICY 4.3
### Integrate the protection and restoration of local biodiversity into open space construction, renovation, management and maintenance.

The City should work to protect and enhance biodiversity throughout the parks and open space system. When parks and open spaces are renovated and new spaces are planned or acquired the City should work to ensure that these spaces are environmentally sustainable, from construction to management. New buildings and park features should protect and help restore local biodiversity. Appropriate criteria should be applied to different open spaces depending on the sensitivity of the habitat, the proposed uses, and the amount of space the new or renovated project will provide. However, certain key requirements, which the City is currently working on, will be applied to all new and renovated open spaces:

- **Soil conservation.** In order to conserve and to use local soil, a cut fill balance will be maintained where feasible to minimize the need to transport soil to or from the project site.
- **Native and drought-tolerant plants.** The City is working to replace invasive and water-intensive species and species of minimal habitat value with species that fit better with San Francisco's natural environment. Just as the City restores degraded areas with local native plants for wildlife habitat and biodiversity in natural areas, habitat and biodiversity should be considered along with traditional landscaping objectives of aesthetics and cultural value throughout our park system and in the streetscape. Drought-tolerant non-native plants can also contribute to the thriving of local biodiversity and meet many of these overall goals. To provide native and drought-tolerant plants, the City should continue to work with private entities and City agencies to encourage native and drought-tolerant plant nurseries.
- **Lighting.** Park lighting should be environmentally efficient and provide safety and security to park users, while being as limited as possible in order to protect wildlife in natural areas from the impacts of light pollution.
- **Habitat and Wildlife.** Where appropriate, utilize materials and design spaces, facilities and buildings in a manner that provides habitat for local and migrating wildlife.
- **Construction and Siting.** Utilize green building practices, local materials, services and supplies; site new structures in locations that minimize disruption of the natural environment; and mitigate impacts during constructions phases.
- **Waste Management.** The City should continue to enforce the no feeding of wildlife provision of the Park Code and manage recreational facilities to minimize wildlife access to human garbage.
- **Stormwater Management.** The City should continue to creatively solve for the management of stormwater runoff in our dense urban landscape. Managing the city's stormwater runoff in an environmentally-sensitive manner, such as using bioswales or through creek restoration could provide an increasingly biodiverse habitat.

### POLICY 4.4
### Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities.

The City has been working to develop more sustainable practices in the development or renovation of their park and recreational facilities. Below are a number of programs that highlight efforts throughout the City.

- **Water conservation, recycling/reuse, and stormwater mitigation.** The SFPUC has developed a recycled water program with the North San Mateo County Sanitation District to use recycled water for three golf courses: Lake Merced Golf Club, Olympic Club, and San Francisco Golf Club. The SFPUC is also working on a treatment facility for recycled water on the city's west side. One of the primary uses of this recycled water would be to irrigate parks and open spaces in City property such as Golden Gate Park. The Recreation and Parks Department is the biggest user of water in the city, with an annual total usage of 691 million gallons of water. It is therefore critical to conserve potable water and promote alternative water resources such as recycled water and stormwater capture, especially for uses such as irrigation. Expanding the use of recycled water and considering other innovative treatments to capture and reuse stormwater runoff are being pursued by the SFPUC, the Recreation and Park Department, and the Office Community Investment and Infrastructure. Impervious surfaces are being limited or retrofitted to utilize pervious surfaces and innovative methods for capturing and reusing storm water, such as cisterns. Support for these efforts should continue, as they offer an easy and effective solution to water conservation and to potential water shortages caused by drought, earthquakes, or decline in the snow pack.

- **Energy production and efficiency.** The City's open spaces could serve as a source of energy for the City. For example, new or renovated buildings could utilize solar panels or other alternative energy sources. The SFRPD has also been a leader in the City in trying to reduce their energy usage. The goal is to realign the records so that meters are tied to park names and building names in order to have greater control of energy reduction measures. Currently, meter numbers are tied to physical addresses only with multiple meters and multiple addresses in one property.

- **Composting and Mulching.** The City has had a composting program since 1996. SFRPD is one of the leading partners and one of the biggest producers of green waste in the City. The recycling of this waste is used not only in city parks and in community gardens throughout the City, but is provided to farms and households for use in their private gardens.

- **Integrated Pest Management.** The City of San Francisco follows the award-winning Integrated Pest Management ordinance. The law requires that when the City is managing unwanted insects, rodents, birds, weeds, or other organisms for buildings & landscapes that the City follow a series of requirements including: how integrated pest management (IPM) is implemented, limitations on pesticide products, exemptions to the Reduced Risk Pesticide List (that may be used as a last resort), posting and notification for pesticide treatments, recordkeeping and data requirements, and accountability. The program must be followed by all city agencies and any city agency that leases land from the city.

- **Historic Preservation.** Appropriate repair and retrofitting of existing historic resources is an inherently sustainable strategy and ensures that the character and integrity of significant historic resources is maintained. Adaptive reuse, such as for new programming, accessibility, life and safety, and systems upgrades, is a strategy that can be used to conserve materials, minimize impacts to the environment, promote a sense of place, and improve livability.

**OBJECTIVE 5**

## ENGAGE COMMUNITIES IN THE STEWARDSHIP OF THEIR RECREATION PROGRAMS AND OPEN SPACES

Residents can be a major asset in addressing open space needs, providing oversight, maintenance and stewardship. They can be instrumental in ensuring that recreation and open space activities are rooted in local needs and can offer a community-based solution to public sector gaps, particularly in times of budget constraints.

### POLICY 5.1
### Engage communities in the design, programming and improvement of their local open spaces, and in the development of recreational programs.

The most successful public spaces are those that respond to the needs of their users. Statistics, maps and figures can only go so far in determining a community's need – they can explain proximity to open space, they can describe type of open spaces that are missing (hiking trails, sports fields, playgrounds, access to and from open water, etc.), but they cannot identify the components of open space design which will most reflect their user community.

Open space designs and improvement plans, recreational programs, partnerships for new concessions, and other park additions should always include community participation. The level and intensity of community outreach and engagement may differ based on project type, ranging from written notifications, to community meetings and workshops, to design charrettes. Outreach and engagement efforts should start at the initial project stage, which provides the opportunity to learn about the local community's recreation and open space needs, and continue throughout the project. The City should strive to actively engage community members throughout the process by using a variety of community engagement tools.

A diversity of recreation programs is typically needed to serve the recreation needs and interests of San Franciscans. The City should consider many tools and criteria when developing recreation programs. Some useful tools include but are not limited to:

1. the City Survey from the Controller's Office, which provides an overview of park usage, park quality, and park programming from residents;
2. intercept surveys, which provides observational park usage;
3. user surveys from recreation programming participants;
4. facility-based input to provide neighborhood feedback on recreation programming; and,
5. emerging technologies that survey existing and potential park users including residents, workers, and visitors.

Connecting with and engaging the community will expand opportunities to honor community heritage, facilitate participation in broader arts and cultural activities, and ensure that facilities and programs are appropriate for park users and reflect community character.

Community representation can be continued as the park evolves by including plans that promote volunteer projects derived from the interest and abilities of the community, under the direction of park staff.

### POLICY 5.2
### Increase awareness of the City's open space system.

San Francisco's open spaces offer residents, visitors and workers many opportunities for recreating and relaxing. The enormous variety of spaces offers a range of options for the user, from a small plaza where downtown workers sit to enjoy their lunch, to large parks where hikers can walk through a redwood grove, to the numerous classes and programs offered by the Recreation and Park Department for families.

The City should coordinate efforts to increase awareness of all City-owned open spaces and promote an increased use and activation of underutilized spaces, which are often underused simply because people are unaware of all the amenities offered. The Recreation and Park Department should continue to enhance its presence on the internet, social media, and emerging technology. All City agencies owning public open spaces should also use emerging technologies to increase awareness of public open spaces. Ideally, the City should create a holistic platform that includes information (hours of operation, permitted activities, community stewardship opportunities, etc.) on all publicly-owned parks and open spaces regardless of the owning agency.

Open spaces also provide an opportunity to increase public understanding of and appreciation for San Francisco's unique natural heritage. Larger open spaces, such as natural areas and parks, as well as smaller landscaped areas, such as POPOS and street parks, may present opportunities to build awareness and understanding of ecology and the natural world through design elements such as demonstration gardens, educational signage, and interpretive artwork. The City should continue to explore creative partnerships with community groups, educational institutions, and cultural organizations to expand environmental education programs and provide opportunities for community-based stewardship and conservation. Such programs should target youth and high-needs areas in particular.

### POLICY 5.3
### Facilitate the development of community-initiated or supported open spaces.

Publicly-owned and managed open spaces, such as those managed by the SFRPD, are only one component of the City's open space network. Informal, community-organized open spaces, such as community gardens, green opportunities on street corners or along undeveloped street right-of-ways, and opportunities on private or underutilized (vacant) property, provide great opportunities for recreation and open space.

Community organizing around engaged urban revitalization, such as the creation of parks and open space, can have tangible social benefits too. It fosters a sense of responsibility, and encourages residents to take initiative in affecting their own environment. Creation of a community space can support the coming together of a neighborhood, facilitating social interactions and further increasing participation in future planning efforts.

The City should look for opportunities to expand the development of street parks, urban plazas, community gardens, improved streets, and shared school playfields (as described in Objective 3). An evaluation of public property potential, vacant and underutilized properties, and even private property where agreements with owners could be facilitated, would aid in identifying open space opportunities. While gaining access to private property is often a challenge, as owners may want to preserve development potential in the future, it may be possible to structure conditions that allow for temporary use as open space. A formal authorization agreement between the property owner, City, and community could regulate limited-term public use, allowing vacant private properties to serve as a positive community asset without detriment to existing or future building rights.

The City should support community-initiated efforts both administratively and financially by promoting and expanding programs like the Community Challenge Grants and Community Opportunity Fund. The City should also broaden communities' awareness of ways to develop or improve their own neighborhood spaces, the need for open space, and opportunities for them to respond to such needs. Education programs, which can be held in schools, within nonprofit programs, or even as seminars at neighborhood organizations, allow residents to tap into strategies for designating, financing and developing urban open space.

Various nonprofit organizations already provide technical assistance and support, broadening knowledge about what communities can do; organizing seminars, which aid community groups in understanding how to get a project started; providing planting lists and advice on their websites; and holding volunteer days to help implement work. Communities may also have physical needs for maintenance support and tools. Tool lending libraries that assist park volunteers in cleanups, landscape improvements, and community tree plantings, all help support the development of open space and should be supported.

### POLICY 5.4
### Reduce governmental barriers to community-initiated recreation and open space efforts.

The high cost of permitting requirements, combined with the time to complete them, can be a significant disincentive to community efforts. Recognizing this, San Francisco's street regulating agencies have streamlined permitting processes for street landscaping and reduced fee requirements. However, significant hurdles still exist to creating major changes to properties or to the public right-of-way. Because of the potential for conflicts with parking, traffic, transit, and adjacent uses, it is difficult to streamline major improvement processes. Yet, Portland has established a model ordinance, the "Intersection Repair" ordinance, which was intended to facilitate neighborhood improvements to streets, including major interventions like developing public gathering places in a street intersection. The City should study how to improve the delivery of public street improvements, and examine the lessons from places like Portland to examine what aspects can be facilitated.

Liability is another barrier. In San Francisco, improvements that convert private property to publicly accessible, or even private improvements to public property, typically require that the party contributing the improvements indemnify the City of all liability, which can bring the additional financial burden of insurance. The City needs to make a concerted effort to limit such liability concerns, and balance good public policy with legal caution. In particular, the City should pursue legislation to address the issue of public liability in situations of joint use or joint development of public properties, so that the liability may be equitably shared by multiple agencies (such as the agreement between the SFUSD and the Recreation and Park Department to allow public access to some schoolyards).

### POLICY 5.5
### Encourage and foster stewardship of open spaces through well-run, active volunteer programs.

Individual participation in stewardship of public open spaces brings obvious improvements to our parks – greener plantings, better maintenance, and an overall feeling of ownership which can deter destructive behavior. Stewardship activities also provide benefits for the individuals by encouraging appreciation of the space, stimulating more outdoor activity, and promoting long-term civic engagement.

The SFRPD has a wide-ranging volunteer program which creates opportunities to participate in gardening and ecological restoration projects, recreational programming, park planning, and fundraising. The program also fosters group sponsorship through weekly, ongoing work parties that provide ongoing stewardship of a park or area.

The Department of Public Works runs a number of parallel programs, such as Adopt A Street, Streets Park Program, and the Community Clean Team, to facilitate neighborhood stewardship efforts on San Francisco's streets, parks and schools.

The Port has also developed successful partnerships with organizations (like Literacy for Environmental Justice to assist with maintenance and education at Heron's Head Park), and Kayaks Unlimited (for stewardship of Islais Landing).

But more resources are necessary to realize the full potential of volunteer programs, expanding the breadth and depth of volunteer opportunities as well as overall participation rates. The City should work to expand these partnerships for stewardship of parks and open spaces, and could help coordinate all volunteer opportunities – whether City or nonprofit sponsored – into an online, easy-to-access calendar, or create a volunteer database with up-to-date schedules and opportunities. The City should also explore ways to share ongoing maintenance of parks and open spaces with individual stewardship organizations or through inter-departmental coordination.

## OBJECTIVE 6
## SECURE LONG-TERM RESOURCES AND MANAGEMENT FOR OPEN SPACE ACQUISITION, AND RENOVATION, OPERATIONS, AND MAINTENANCE OF RECREATIONAL FACILITIES AND OPEN SPACE

Securing resources for the maintenance and renovation of existing open spaces and providing funding for the acquisition of new open spaces has been a challenge for the City. The City must recognize the costs associated with open space maintenance, renovation, and acquisition and ensure that their funding mechanisms address these major expenditures.

### POLICY 6.1
### Pursue and develop innovative long-term funding mechanisms for maintenance, operation, renovation and acquisition of open space and recreation.

One of the key goals of this Plan is to ensure that the policies and programs have adequate resources and that a consistent source of funding for operations and maintenance is secured. The City has the responsibility to provide necessary funding for well-maintained recreational facilities and open space. To overcome the challenge of the City's diminishing resources and increasing costs and in order to meet existing funding challenges, the City should pursue different innovative financing mechanisms.. These strategies should help the City realize the monetary benefits provided by parks and open space and invest those benefits into the park system. The City should continue to pursue sustainable mechanisms to overcome the funding challenges. Below is a list of different mechanisms commonly used in cities as public finance strategies for parks and open spaces. Many of these funding strategies have been already used in San Francisco. The City should evaluate these mechanisms and their effectiveness on an on-going basis.

- **General Obligation bonds:** RPD has been using general obligation bonds as a long-term capital planning strategy. These bonds focus on the basic, critical needs of the park system, reducing earthquake safety risks and renovating rundown parks, pools, recreation centers, and playgrounds. In order to ensure that each bond efficiently addresses the needs of communities, RPD should continue to assess the results of each bond and their cost-efficiency in order to enhance the structure, process, and efficiency of future bonds.

- **Public-private partnerships:** The City has used public private partnerships since the park system was founded. Support from private entities and individuals can enable the park system to provide services and recreation opportunities to San Franciscans. The City is continuing to develop public-private partnerships to increase open space amenities and funding opportunities. Such facilities can range from mobile food vendors to larger concessions operating in park facilities. Such opportunities can provide a

reliable source of funding for park improvements and maintenance, while ensuring that they benefit park users, address their needs and concerns, and protect the public interest. Responsible agencies should develop these opportunities through an appropriate outreach and engagement process as outlined in Objective 5. Additionally, these agreements should:

  - Maintain and enhance public access to recreation and park services; and
  - Maintain transparency and accountability to the public; and
  - Support the park or open space through financial and/or physical improvements

- **Grants:** Granting agencies such as federal and state agencies and foundations provide innumerable financial help and support to the city. The city agencies should continue to proactively pursue grant opportunities.
- **Local Fundraising:** The City's vast network for park groups and active community organizations provide a wealth of knowledge and resources that can help support the city's open spaces. The City Budget should prioritize adequate resources and consistent funding source for operating and maintaining open space.
- **Citywide Impact Fees to Fund Recreation Facilities and Open Space.** Development impact fees are fees the City charges developers in connection with approval of a development project for the purpose of defraying all or a portion of new public facility needs related to the development. These fees can be used to acquire and develop new recreational facilities and open spaces and for capital improvements to existing open spaces. Development impact fees that provide revenue for recreation and open space are in effect in a number of City neighborhoods, but not citywide. The City has developed an initial nexus study to demonstrate the impact of new development on open space.
- **Park Improvement Districts.** An innovative approach, similar to the Community Benefits District (CBD) used in many of San Francisco's neighborhood commercial districts, is a Park Improvement District. A Park Improvement District is a public-private partnership in which businesses and/or residents in a defined area elect to pay an additional tax in order to fund improvements and maintenance for the park. The parks are maintained by the City, but this additional funding provides supplemental funds to cover needed improvements and maintenance overseen by a neighborhood-elected board of directors. This concept could be piloted to determine its effectiveness.
- **Voluntary Contributions.** Many cities provide the option to voluntarily contribute a small amount of money specifically earmarked for open space. Such a contribution option would be added to residents' utility bills to fund improvements to open space.
- **Tax Revenue Options.** In some cities, decision makers have pursued the option of an additional tax contribution earmarked for open space, usually via an additional property tax on residential and/or commercial owners. The creation of a new tax requires a two-thirds majority vote by the electorate and provides a consistent source of funding. The money can be used for acquisition, maintenance, or capital improvements.
- **Community Facilities Districts.** In Mission Bay and Hunters Point Shipyard, Community Facilities Districts (or CFD), or special tax districts, will be used to help fund the on-going maintenance of the new open space facilities. The South Beach area also has a CFD that helps fund the maintenance of some small public plazas.

RPD and other public agencies responsible for recreation and open space in the City should continue analyzing how such funding options could be applied in San Francisco for recreation and open space maintenance, operations, renovation and acquisitions.

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2014 Recreation & Open Space Element adopted by the Board of Supervisors Ordinance 0153-14 on 07/15/2014.

Amendments by Board of Supervisors Ordinance 0023-15 adopted on 02/10/2015.

Amendments by Board of Supervisors Ordinance 0020-17 adopted on 01/31/2017.

Amendments by Board of Supervisors Ordinance 0019-17 adopted on 01/31/2017.

Amendments by Board of Supervisors Ordinance 0274-18 adopted on 11/13/2018.

Amendments by Board of Supervisors Ordinance 0064-20 adopted on 04/21/2020.

Amendments by Board of Supervisors Ordinance 0143-20 adopted on 08/18/2020.

Amendments by Board of Supervisors Ordinance 0155-23 adopted on 07/25/2023.

**EXHIBIT 5**

# Safety & Resilience Element

NOTE: This **2022 Safety and Resilience Element** was adopted by the San Francisco Board of Supervisors on December 13, 2022. This Element update replaces the previous 2012 Community Safety Element.

## INTRODUCTION

## Purpose

The purpose of the Safety & Resilience Element is to facilitate safety from hazards, achieve racial and social equity, and strengthen community resilience. It provides a comprehensive set of policies for minimizing San Francisco's contribution to climate change (or "the climate crisis") and ensuring local resilience to multiple hazards. The policies here seek to protect the people and assets in San Francisco from loss of life, injury, property loss, environmental damage, and social and economic disruption from natural or technological disasters. The City has a profound obligation to protect communities and areas that face higher vulnerability to disasters.

The Safety & Resilience Element focuses on all hazards: natural and human-made. There is a strong foundation addressing seismic hazards, as earthquakes are the greatest risk to life and property in San Francisco due to the San Andreas and Hayward Faults. There are numerous other hazards prone to occur in San Francisco, such as flooding and poor air quality. Additionally, there are human-made hazards that pose threats to the City's health and welfare and must be considered alongside natural hazards for mitigation, preparedness, response, and recovery, such as pandemic and release of hazardous materials. Due to the climate crisis, hazards are occurring more frequently, intensely, and simultaneously. The Safety & Resilience Element aims to address the complexity and severity of all hazards.

The Safety & Resilience Element names Environmental Justice Communities as areas in San Francisco disproportionately experiencing environmental burdens. Environmental Justice Communities, and others, tend to experience hazards more frequently and more intensely as compared to the City as a whole, and they take longer to recover. The Environmental Justice Communities Map identifies communities based on exposure to environmental pollution and other social vulnerabilities, which are often low-income communities and communities of color. Similarly, the Safety & Resilience Element names the American Indian community, the Black community, and other communities of color who are disproportionately experiencing racial and social inequities. The policies also name vulnerable communities with heightened risk and increased sensitivity to potential harms than the City average. The Safety & Resilience Element seeks to eliminate disparities and burdens related to all hazards and the climate crisis for all San Franciscans, starting with Environmental Justice Communities and other vulnerable people. When named, the Safety & Resilience Element is indicating the geographic areas (Environmental Justice Communities) and/or dispersed communities (American Indian community, the Black community, and other communities of color, and other vulnerable communities) in the City where policies should begin and target their work. In doing so, the Safety & Resilience Element offers policies to achieve racial and social equity, through actions and other systemic changes that amend past injustices and enable proactive, community-led solutions for the future.

In brief, the Safety & Resilience Element is organized into six goals to achieve racial and social equity, environmental justice, and climate resilience.

1. **All People Live in Safe & Healthy Communities:** To ensure equitable safety, San Francisco must remedy past injustices and eliminate environmental burdens for all San Franciscans, starting with those experienced by Environmental Justice Communities.
2. **Multi-Benefit Climate and Hazard Resilience:** Pursue multi-hazard risk reduction strategies and maximize community benefits along the way to becoming a net-zero emissions City by 2040.
3. **Hazard Mitigation:** The City must reduce the likelihood, scale, and severity of impacts from all disasters to the economy; the built and natural environment; and all communities, starting with reducing such impacts in Environmental Justice Communities.
4. **Emergency Preparedness:** Ensure San Francisco residents, workers, and visitors have the knowledge, capacity, and government support needed to be safe in the face of disasters.
5. **Response:** Provide San Francisco residents, workers, and visitors with the essential support and services needed immediately following a disaster for life safety and functional recovery.
6. **Recovery and Reconstruction:** Rebuild San Francisco's built, natural, and social assets and communities towards a more equitable and resilient future.

# Implementation

The Safety & Resilience Element establishes policies to guide the City's actions in preparation for, response to, and recovery from a major disaster. As a policy document, the Safety & Resilience Element guides city decision making and actions, such as funding programs and regulating development. Implementation of the Safety & Resilience Element is carried out through numerous City plans and programs, as well as actions by the private sector and development.

Notably, there are multi-agency efforts to coordinate climate mitigation and adaptation and ensure San Francisco becomes more resilient to the threats of the climate crisis. Mayor London N. Breed officially launched ClimateSF in 2021, led by the Mayor's Office and the Office of Resilience and Capital Planning, Planning Department, Department of the Environment, Port of San Francisco, and the San Francisco Public Utilities Commission. ClimateSF establishes goals for collective action on climate resilience planning, policy, and guidance across the City. This coordination supports a central focus on racial and social equity, healthy communities, just transition, connection to nature, and innovation. Through ClimateSF, major components of the Safety & Resilience Element are implemented.

### RELATIONSHIP TO CITY-LED ACTION PLANS AND PROGRAMS

The Safety & Resilience Element contains broader policies to reduce impacts that will need to be carried out by the City. The City maintains three principal implementation plans that provide more immediate directions, specific strategies, and measurable objectives for monitoring and evaluation: the Hazards and Climate Resilience Plan, Climate Action Plan, and Emergency Response Plan. These plans work in partnership with the Safety & Resilience Element and are incorporated by reference here. A fourth plan, a Recovery Plan, is planned to be produced by the City to facilitate healthy and equitable recovery after disaster.

- The *Hazards and Climate Resilience Plan* (HCR), led by the Office of Resilience and Capital Planning and adopted by the Board of Supervisors, is a climate adaptation plan that responds to all hazards. The HCR serves as the City's local hazard mitigation plan for disasters, adopted by the Federal Emergency Management Agency (FEMA). It is the City's blueprint to understand and prepare for the impacts of natural hazards and climate change on our people and our assets.

- The *Climate Action Plan* (CAP), released by the Mayor and Department of the Environment, was originally developed to reduce the City's greenhouse gas emissions. Achieving net-zero greenhouse gas (GHG) emissions by 2040 is still a plan driver; the plan now acknowledges the interwoven social and racial inequities of the climate crisis. Accordingly, the CAP advances measurable strategies to achieve net-zero emissions while addressing racial and social equity, public health, a just economy, and community resilience.

- The *Emergency Response Plan* (ERP), led by the Department of Emergency Management, provides an immediate action plan to coordinate response to disaster. It includes an overview of the emergency management system, detailed and restricted information for the Emergency Command Center, and a set of functional and hazard-specific details. The COVID-19 Phases I and II After Action Report outlined the strengths of the City's plans and suggested further updates to enhance the City's Emergency Response Plan. The suggested improvements include increasing community equity, improving the City's Disaster Service Worker program, and providing further clarity and streamlining to both the organization of response services and procurement of emergency supplies.

- A *Recovery Plan* is planned to be produced by the Office of Resilience and Capital Planning. The City needs an advance planning document to guide long-term recovery and reconstruction post-disaster for all hazards that the City faces. A recovery plan can support rebuilding the City in a way that is more equitable and resilient to future disaster, based on the latest citywide goals and values, community needs, and approaches for building back better.

There are many other plans and programs throughout the City that support the Safety & Resilience Element, such as the Community Action Plan for Seismic Safety, the Neighborhood Empowerment Network, the Neighborhood Emergency Response Team, and the Lifelines Council. In addition to City-led actions, the Safety & Resilience Element relies upon the private sector, community-based organizations, and a range of additional stakeholders to support full and robust implementation of these policies.

## GOALS, OBJECTIVES & POLICIES

# Goal 1. All People Live In Safe & Healthy Communities

All stages of hazard management—mitigation, preparedness, response, recovery and reconstruction—are too important and too big a task for City agencies to take on their own. It would also be ineffective and may cause further harm to do so in a vacuum, without the involvement of the people most affected by hazards. Residentsand community members themselves must play a central role in decision-making.

The planning process must develop an education-based involvement opportunities that supports community leadership development. Planning efforts should not only identify, but actively engage, the varied interests of the community. These processes should include holistic information around hazards and impacts; contribute to the vision for the City's future per the General Plan and community outreach and engagement; and support the achievement of racial and social equity. As possible, identify responsible agencies, institutions, and other partners responsible for implementing strategies for safety and resilience.

The City should also help to develop community skillsets pre-disaster, on both an individual and neighborhood level, to empower community members to meaningfully participate in a post-disaster reconstruction planning process, work effectively together to identify and prioritize community needs, and work collaboratively with the City to communicate these needs and ensure that they are met. Programs such as the Neighborhood Empowerment Network (NEN) help to build community capacity and develop these essential skills before disaster strikes, so that everyone can participate effectively in the reconstruction process after the disaster.

## OBJECTIVE 1.1.

### *JUST EMPOWERMENT.* SUPPORT THE GROWTH OF COMMUNITY NETWORKS TO EMPOWER ALL PEOPLE.

**POLICY 1.1.1.**

**Engage the community in the planning process.**

Knowledge about geologic risks in the Bay Area is substantial, but always evolving. The City needs to keep informed, through the professional contacts of its staff, and through State and federal agencies like CalEMA and the United States Geological Survey, about advances in the field. New information will be shared with the public and decision-makers.

Similarly, new techniques are continually developing in the seismic design of structures, and new data is emerging about the actual seismic performance of previously retrofitted buildings. The risks of damage to life and property can be reduced by these improved engineering practices. The City should continue to support the institutions, professional organizations and individuals who carry out research in structural safety. Special attention should also be paid to support and seek out research that identifies innovative and low-cost retrofit concepts. Once the City sets new acceptable safety levels, this research should support the engineering requirements to meet safety levels.

**POLICY 1.1.2.**

**During climate mitigation activities, prioritize investment and resources in Environmental Justice Communities, especially through existing community-based efforts.**

During climate mitigation activities, the goal is to support the City become a net-zero emissions City by 2040 by reducing the amount and rate of greenhouse gas emissions. For many mitigation approaches, such as utilizing low-carbon transportation modes and electrifying buildings, it takes investment and resources to make these shifts in behavior at the individual and community level. Environmental Justice Communities and other vulnerable people should benefit from targeted investment and resources to make these changes. By prioritizing investment and resources into these communities, financial responsibility for climate action is shifted away from the people most adversely impacted by the climate crises. During project design and planning, specify how the scope, outreach, implementation, and budget serves the needs of these communities to mitigate their contributions to greenhouse gas emissions. In addition to reducing the amount and rate of greenhouse gas emissions, there can be additional community benefits in public health, local businesses, and quality of life. There can be opportunities to partner with existing community-based organizations and neighborhood-level efforts to effectively reach Environmental Justice Communities and other vulnerable people.

**POLICY 1.1.3.**

**During emergency preparedness activities, inform all individuals about the risks, vulnerabilities, and consequences of their neighborhood and communities from all hazards through culturally competent and equitable communications.**

Everyone should be equipped with the public awareness of how all hazards may affect the City, the potential impact on their lives, and what to do to exercise their resilience. The City must support widespread, current, and actionable public awareness activities for robust emergency preparedness. With greater awareness, the less likelihood of loss of life and harm and the more likelihood that people are safe and able to bounce back after disaster. As hazards are felt disproportionately across the City, it is vital that this information be made in culturally competent methods and equitably distributed to communities that are hard to reach, such as linguistically isolated

communities and communities across the digital divide. As part of racial and social equity assessments and vulnerability and consequences assessments, the City can support a centralized repository of hazards information, directories to resources and training, and accessible, neighborhood-level information. The City can support conducting research and training materials, distribution across culturally competent and mass communications streams, and identify resources that can activate readily in the event of a disaster.

**POLICY 1.1.4.**
**Establish a network of staff supporting the Equity Officer to advocate and advise on equitable response, recovery, and reconstruction activities during and after a disaster.**

In the Incident Command System (ICS) of the Emergency Operations Center (EOC), there is an Equity Officer responsible for incorporating equity, inclusion, and community needs into emergency response. The Equity Officer is built into the emergency response structure that will help reach all parts of the City in the event of a disaster. Based on lessons learned from the COVID-19 After Action Report for Phase I and Phase II, there is a strong need and opportunity to establish a network of staff during emergency response that have built trust with communities and neighborhoods.

This network of staff can serve as experts of neighborhood-specific and potentially block-level conditions, liaisons to community-based organizations and other stakeholders, and trusted messengers to vulnerable people. The staff should represent and work strongly with the American Indian, Black, and other communities of color and other vulnerable people. During all EOC activations, this network would coordinate to equitably implement response, recovery, and reconstruction activities. This network may have memorandums of understanding with key agencies and community stakeholders to support their integration into emergency management best practices.

**POLICY 1.1.5.**
**During response activities, the City should partner with non-governmental entities to respond to hazard impacts in Environmental Justice Communities.**

Partnerships with non-governmental entities can be critical to respond to the widespread impacts of a disaster. In the immediate aftermath of a disaster, these partnerships will facilitate the “all hands on deck” response to prevent further loss of life and ensure the City recovers more equitably and resiliently.

By laying the groundwork necessary for strong public-private partnerships in advance—by establishing relationships with universities, corporations, and foundations—the City can put itself in a strong position to receive support outside of regional, state, and federal aid, which could be critical if disaster is widespread and government resources must be extended. The City can activate public-private partnerships and partnerships with community-based organizations as a strong tool in revitalization after a community disaster.

Relationships with corporate entities, particularly those with local ties, can lead to financial and other support in reconstruction and restoration efforts. Relationships with community-based organizations and other neighborhood-level efforts can lead to increased outreach to people who are in need of support. Their local knowledge can support distribution of resources and programs, identify neighborhood-level or block-level challenges, and serve as trusted messengers of key information.

**POLICY 1.1.6.**
**During recovery and reconstruction activities, rebuild in ways that remedy safety and resilience injustices in Environmental Justice Communities.**

The City’s response efforts can be made stronger with robust partnership with its neighborhoods. Neighborhoods can be a driving force in recovery efforts. Residents, leaders, and community members understand the lived experiences and priorities of their neighbors, and they have more personal motivation to ensure projects and programs are carried out successfully. Often a lynchpin for rebuilding, preexisting community efforts and community-based organizations can readily provide a strong local force to extend the reach of government-provided recovery and reconstruction.

In recognition of neighborhoods’ critical role in recovery, the City should work to increase the capacity of neighborhoods and neighborhood groups. The City currently maintains a number of programs, such as Neighborhood Emergency Response Team (NERT) and the Neighborhood Empowerment Network (NEN), that empower community members and community-based efforts to participate in climate mitigation and disaster recovery efforts.

These programs should be viewed as part of developing a framework of efforts to prepare communities in advance of a disaster. This framework should encompass community outreach and the provision of information; emergency preparedness exercises such as mapping and planning; and other problem-solving activities to tackle the range of potential hazards. By building the capacity of neighborhoods pre-disaster, neighborhoods are more capable to support post-disaster decision-making around issues such as land use, transportation, and economic development.

The City should expand opportunities for community members to organize at a neighborhood- or block-level to facilitate strong social ties that serve in resilient recovery and reconstruction activities. Identify incentives to convene, share resources and tools, and identify community-level leadership development.

## OBJECTIVE 1.2.

## *CONTINUOUS ASSESSMENT AND EVOLUTION.* ACT BASED UPON BEST PRACTICES AND CONTINUOUSLY IMPROVE THE KNOWLEDGE BASE TO REMEDY PAST INJUSTICES AND ELIMINATE DISPARITIES.

### POLICY 1.2.1.
### In all stages of safety and resilience, prioritize the needs of people most impacted by the adverse impacts of hazards.

People are the most precious part of cities. As hazards occur, the adverse impacts are felt unevenly throughout the City. There are people who have higher vulnerability to hazard consequences and take longer to recover. Due to systemic inequities, there are people who are more likely to experience a hazard first and worst, and take longer to recover, than the City overall.

In order to support Environmental Justice Communities and other vulnerable people, the City must identify and prioritize the needs of people most impacted by hazards in all safety and resilience efforts. The City must increase baseline understanding of disproportionate inequities (causes), impacts (effects), and opportunities to increase safety and resilience (solutions). The City must continuously update this understanding by identifying critical needs and infrastructure, conducting racial and social equity assessments, conducting outreach and engagement activities, and incorporating racial and social equity indicators into the evaluation and monitoring of programs.

### POLICY 1.2.2.
### Use the latest assessment tools provided by the Office of Racial Equity and Department Racial & Social Equity Action Plans to center racial and social equity into the planning, evaluation, and monitoring of programs.

In City efforts for safety and resilience, racial and social equity must be incorporated into the planning, evaluation, and monitoring of all programs. For applicable programs, perform racial and social equity assessments and the latest tools provided by the respective agency's Racial & Social Equity Action Plan and the Office of Racial Equity. These tools provide high-level guidance to understanding and centering racial and social equity into projects and programs. The tools require consideration at each step of the decision-making process, as to who would benefit or be harmed by a certain action, and by iteratively considering these questions to generate better results.

### POLICY 1.2.3.
### Prioritize documentation of historic, archaeological, and intangible cultural resources in the most vulnerable areas to the climate crisis, starting in Environmental Justice Communities.

San Francisco's historic and cultural resources are critical to the City's identity. They contribute to the City's unique character, support heritage tourism and economic development, and hold stories of the diverse communities who have called San Francisco their home. The City must continuously understand and preserve these resources and offer reasonable protection from current and future hazards. The City should prioritize documentation of historic, archaeological, and intangible cultural resources in areas most vulnerable to the climate crisis, such as areas within the Sea Level Rise Vulnerability Zone, as these resources may be experience irreparable damage or be completely lost.

Efforts are underway to document, preserve, and protect these assets, including resources that may become inundated by sea level rise or may collapse from an earthquake. However, the timing, severity, and impact of hazards such as earthquakes, floods, and fires are not fully understood. Hazards could severely damage or completely destroy buildings, building features, or artifacts within buildings.

Having a comprehensive cultural resource survey is critical for both hazard risk assessment and post-disaster recovery. The San Francisco Citywide Cultural Resources Survey identifies important individual historic or cultural resources and potential districts throughout the City. Additionally, the City can employ tools such as photographs, architectural drawings, oral histories with community knowledge and culture bearers, 3D laser surveys, and/or digital technology to archive and research these resources. The City can also explore the latest approaches to documenting these resources, as more is learned about preservation and adaptation from hazards such as poor and hazardous air quality and extreme storms.

### POLICY 1.2.4.
### Prioritize funding for infrastructure maintenance and improvements in Environmental Justice Communities.

Environmental Justice Communities and other vulnerable people often rely more heavily on critical pieces of City infrastructure than communities with more resources, higher quality options, and privilege. Infrastructure provides public services such as transportation, water, energy, and internet. These infrastructure assets and systems are essential for people living, working, and playing in the City. It is important to fund the operation, maintenance, and improvements of such infrastructure and prioritize the needs of the communities who are more reliant on their services.

# Goal 2. Multi-Benefit Climate and Hazard Resilience

Pursue multi-hazard risk reduction strategies and maximize community benefits along the way to becoming a net-zero emissions City by 2040.

## OBJECTIVE 2.1.

***CLIMATE RESILIENCE.*** **PURSUE SYNERGISTIC EFFORTS THAT BOTH ELIMINATE GREENHOUSE GASES (CLIMATE MITIGATION) AND PROTECT PEOPLE, THE BUILT ENVIRONMENT, AND NATURE FROM THE UNAVOIDABLE IMPACTS OF THE CLIMATE CRISIS (CLIMATE ADAPTATION).**

### POLICY 2.1.1.
**Coordinate the regular update of implementing documents of this General Plan including: the Hazards and Climate Resilience Plan (HCR) and the Climate Action Plan (CAP), both incorporated by reference here, as well as the Emergency Response Plan (ERP) and the Recovery Plan (pending).**

The Hazards and Climate Resilience Plan (HCR), incorporated by reference here, serves as the City's local hazard mitigation plan to the Federal Emergency Management Agency (FEMA). It addresses all hazards the City is at risk to and strategies to mitigate from harm. It serves as a tracking and monitoring tool, with annual reporting to FEMA. The Climate Action Plan (CAP), incorporated by reference here, guides how the City can reduce greenhouse gas emissions to net-zero by 2040, building on the City's climate and sustainability framework, "0-80-100-Roots." This framework aims for zero waste, 80% of trips taken by low-carbon transportation modes, 100% renewable energy, and carbon sequestration. The Emergency Response Plan (ERP) provides an immediate action plan to coordinate response to disaster. It includes an overview of the emergency management system, detailed and restricted information for the Emergency Command Center, and a set of functional and hazard-specific details.

The Recovery Plan is planned to be produced by the City. The Recovery Plan can serve as the advance planning document to guide long-term recovery and reconstruction post-disaster for all hazards that the City faces.

These documents should be coordinated and be regularly updated to ensure the City is best positioned to equitably protect people from all hazards and the climate crisis.

### POLICY 2.1.2.
**Direct City actions to reduce local contributions towards the climate crisis by mitigating greenhouse gasses and by increasing carbon sequestration.**

Globally, scientific consensus on the threats of climate change and the current climate crisis has been widely agreed upon for many years. The climate crisis increases the frequency of natural disasters and threatens life and wellbeing, the economy, and more. In 2019, the City declared a climate emergency and strengthened plans for net-zero greenhouse gas emissions.

According to the 2022 Intergovernmental Panel on Climate Change Sixth Assessment Report, human-induced global heating is causing dangerous and widespread disruption in nature and affecting the lives of billions of people around the world, despite efforts to reduce the risks. Multiple climate hazards will occur simultaneously, and multiple climatic and non-climatic risks will interact, resulting in compounding the overall risks cascading across sectors and regions. For example, increased heatwaves, droughts, and floods are already exceeding the tolerance thresholds of plants and animals, driving mass mortalities in species such as trees and corals. These weather extremes are occurring simultaneously, causing cascading impacts that are increasingly difficult to manage. They have exposed millions of people to acute food and water insecurity, especially in Africa, Asia, Central and South America, on Small Islands, and in the Arctic.

To avoid mounting loss of life, biodiversity, and infrastructure, ambitious and accelerated climate adaptation is required, at the same time as making rapid, deep cuts in greenhouse gas emissions. So far, adaptation progress is uneven and there are increasing gaps between action taken and what is needed to deal with the increasing risks, the new report finds. These gaps are largest among lower-income populations.

The United Nations Intergovernmental Panel on Climate Change reported a dire warning about the consequences of inaction on the climate crisis, that due to human-induced global heating, the world "faces unavoidable multiple climate hazards" over the next two decades with global warming of 2.7°F (1.5°C). San Francisco has committed to local action to limit further warming through a goal of net-zero sector-based emissions by 2040, a 90% reduction from 1990 levels, and an interim target of cutting sector-based emissions 61% below 1990 levels by 2030.

The Climate Action Plan describes the strategies necessary to reach emissions reductions goals by sector:

- **Zero Waste:** By 2030, reduce solid waste generation by at least 15% below 2015 levels, and reduce solid waste disposed of by incineration or deposit in landfill by at least 50% below 2015 levels.
- **Transportation:** By 2030, increase low-carbon trips to at least 80% of all trips measured, and increase electrification of vehicles to at least 25% of all private vehicles registered. By 2040, in-crease electrification of vehicles to 100% of all private vehicles registered.
- **Energy:** By 2025, supply 100% renewable electricity, and by 2040, supply 100% renewable energy.
- **Housing:** Build at least 5,000 new housing units per year with maximum affordability, including not less than 30% affordable units, with an emphasis on retaining and rehabilitating existing housing.
- **Buildings:** By 2021, require zero onsite fossil fuel emissions from all new buildings, and by 2035, require zero onsite fossil fuel emissions from all large existing commercial buildings.
- **Roots:** Sequester carbon through ecosystem restoration, including increased urban tree canopy, green infrastructure, and compost application.

### POLICY 2.1.3.
### The City shall create and implement a Recovery Plan to facilitate robust social, economic, and environmental recovery post-disaster.

The experiences of New Orleans, Louisiana and the Gulf after Hurricane Katrina in 2005 illustrate the need for local jurisdictions to perform advance planning. Before a disaster strikes, there may be more resources within the community and within local government available. While the specifics of recovery would vary depending on hazards and impacts, certain aspects of recovery can be facilitated by advance planning.

The Association for Bay Area Governments produced a model recovery plan for the City of Oakland. A local recovery plan for the City should be centered in racial and social equity and should include, but not be limited to, the following topics discussed in Oakland's plan: financing recovery issues; recovery of government facilities and services; land use change; and the long-term recovery of housing, business, health care, schools, utilities, and transportation.

### POLICY 2.1.4.
### Ensure that City projects and private developments provide multi-benefit solutions that mitigate hazard risk and contribute to a zero-emission future.

With limited resources and capacity, it becomes more important that large development projects provide as much comprehensive benefit to the community as possible. The climate crisis is worsening conditions on the ground, and hazards are occurring more frequently, intensely, and simultaneously. A development project must consider a broad set of hazards and prepare holistically for the project's climate resilience, while actively reducing greenhouse gas emissions to contribute to Climate Action Plan targets and goals. Options for projects to reduce emissions include carbon sequestration through urban greening and native planting, building electrification, and connection to renewable energy.

## OBJECTIVE 2.2.

## *MULTI-HAZARD RESILIENCE AND CO-BENEFITS.* IN ADAPTATION AND MITIGATION INVESTMENTS TO MULTIPLE AND SIMULTANEOUS HAZARDS, MAXIMIZE RISK REDUCTION STRATEGIES AND THE RELATED COMMUNITY BENEFITS.

### POLICY 2.2.1.
### Include multi-hazard risk assessments in private development, capital projects, and the City's climate resilience programs.

With limited resources, and the worsening effects of the climate crisis, the City must extend the reach of every dollar spent on climate adaptation. The City must evolve the approach to climate adaptation and address how hazards are occurring more frequently, intensely, and simultaneously. In the project design and planning, incorporate how projects can deliver on a broad set of values and goals of the City.

With multi-hazard risk assessments, programs and projects need to consider the near- and long-term risks of all hazards. ClimateSF, the City's coordinated climate resilience interagency group, can support connecting climate resilience to intersecting issues across housing, health, transportation, and other public benefits. The General Plan can also determine opportunities for projects to support public benefits.

In private development and capital projects, development plans should ensure new development is designed and constructed to ensure functional recovery—beyond life safety expectations—in the event of all hazards. For known hazard risks, such as liquefaction on landfill areas, development should seek a performance equivalent to that of similar structures built on firm ground. For development within the Air Pollution Exposure Zone (APEZ), the plan should provide as healthy indoor air as projects that are outside the APEZ.

The project teams should conduct outreach and engagement to assess and understand the complete set of hazards and associated vulnerabilities in a project geography, especially as they relate to environmental justice. The assessments should support expanding the impact of resources directed at a singular hazard to develop multi-benefit strategies and solutions for projects and communities. Work with stakeholders, community members, and the private sector to assess and understand the complete set of hazards and associated vulnerabilities in a major development's surrounding area.

### POLICY 2.2.2.
### Examine the risk of flooding and evaluate adaptation actions that will protect people and the built and natural environments to help inform land use, capital investment, and other policies.

Despite best efforts to reduce greenhouse gas emissions and mitigate against the climate crisis, current CO2 levels are already causing changes in weather patterns, more extreme weather events, and an increase in sea levels. Even if greenhouse gas emissions were halted today, the long half-life of many greenhouse gasses and the change in global ocean temperatures mean that we will be experiencing consequences of increased CO2 in the atmosphere for centuries.

There is potential for permanently inundated land to greatly increase from the climate risk and associated flooding from storm surges, increased participation, sea level rise, and groundwater rise. With worsening conditions and without adaptation action, flood hazards will expand and alter the current 100-year floodplain and Sea Level Rise Vulnerability Zone, making many more people and structures vulnerable than currently. The City should continue to review scientific emissions and sea level rise projections to become fully aware of risks to health, safety, and reliable functioning of City infrastructure systems due to flooding, as well as support the institutions, professional organizations and individuals who carry out climate research. In certain areas of the City, such as Environmental Justice Communities, neighborhoods may be affected by the intersection of increased flooding and increased exposure to toxic substances. There is ongoing research to explore how flooding, especially groundwater rise, affects the mobilization of toxic substances from contaminated soils, and the related public and environmental health impacts.

The risk of flooding needs to be taken into account when making land use decisions, bearing in mind that perceptions of acceptable risk may change in the future. These risks should also be incorporated into appropriate City plans and policies, such as the Planning and Zoning Codes, and capital planning. The Planning Commission, Board of Supervisors, and other City decision-making bodies should be fully apprised of these risks as they conduct reviews.

The City should review best practices, case studies, and current technology to mitigate these potentially harmful effects and adapt to future conditions that will reduce loss of life, build structures, and infrastructure. Adaptation actions should be considered for feasibility, and they should be incorporated into seismic upgrades and routine maintenance if possible. The adaptation strategies can include, but are not limited to: building elevation, floodproofing, green infrastructure and ecological/habitat features, hard engineering, zoning/code changes, and relocation of sensitive assets.

### POLICY 2.2.3.
### Seek sufficient funding to address climate hazards through all phases of mitigation, preparedness, response, recovery, and reconstruction.

Each phase of disaster planning (mitigation, preparedness, response, recovery, and reconstruction) requires their own planning, design and engineering, construction, maintenance and operations, and ongoing monitoring. Providing sufficient staff and budget resources for interagency coordination is no small feat. Further, equitable distribution of funding—considering historic disinvestment in certain communities—requires heightened consciousness to resource allocation and providing opportunities for community input and decision making.

The 10-Year Capital Plan provides an approach for long-term efforts to be balanced with immediate needs. The Capital Plan should prioritize funding for 1) Environmental Justice Communities for the specific threats they face being compounded by systemic inequities; 2) specific hazard threats poised in vulnerable areas; 3) areas and functions that serve the most people 4) projects with matching state and federal funding; and 5) investments that support achieving a state of good repair of existing infrastructure and assets. The traditional cost-benefit models to determine funding needs have been built around tax and economic revenue, which continues cycles of disinvestment in historically disadvantaged and disinvested areas. Instead, holistic cost-benefit models should consider social, economic, and environmental costs and benefits.

### POLICY 2.2.4.
### Adapt the City's bay and ocean shorelines to current and future climate flood hazards, including coastal flooding, sea level rise, groundwater rise, and extreme storms.

The City faces threats from the slow-moving disasters of sea level rise and flood hazards. Surrounded on three sides by water, the City must adapt the bay and ocean shorelines to these hazards to prevent inundation; spread of environmental pollutants; disrupted services of key assets such as utilities and underground rail; assets and property damage; and loss of open space, neighborhoods, and communities.

The City should develop adaptation strategies to address current and future hazards for the bay and ocean shorelines. Building off of the Sea Level Rise Action Plan, the City should develop a citywide adaptation plan that addresses the interaction between sea level rise, coastal and inland flood hazards, and extreme storms. The adaptation plan should include a model of these joint hazards and have neighborhood-specific analysis, especially in low-lying areas in the Sea Level Rise Vulnerability Zone, like Mission Creek, Islais Creek, and Yosemite Slough.

The adaptation strategies may use a combination of measures, including flood defenses, accommodation strategies such as floodproofing, elevating sensitive equipment, operational policies, and removal or relocation of sensitive assets. Flood defense measures should incorporate natural or ecological features as much as possible. Adaptation strategies should be reviewed and amended over time as conditions and flood projections evolve. They should build in redundancy to provide extra protection should flood defense structures fail.

## OBJECTIVE 2.3.

## *NATURE-BASED SOLUTIONS.* ENHANCE NATURE, BIODIVERSITY, AND PUBLIC OPEN SPACE THROUGH CLIMATE RESILIENCE STRATEGIES THAT MIMIC OR RESTORE ECOLOGICAL SYSTEMS AND FUNCTION.

### POLICY 2.3.1.
### Maximize the preservation and maintenance of carbon sinks and landscape approaches that advance the rate of carbon sequestration.

An essential element of becoming a net-zero emissions City is pursuing carbon sequestration, the capture and storage of greenhouse gas emissions. Trees, other flora, especially native plants, should be preserved, maintained, and increased as carbon sinks in the City. Native plants should be prioritized in pursuit of the City's carbon sequestration, water management, and biodiversity goals.

There are many City agencies involved in this work, such as Public Works, Recreation and Parks, Department of the Environment, the Public Utilities Commission, and the Port. Public Works has ongoing efforts to plant trees throughout the City that are sequestering carbon through tree photosynthesis. Recreation and Parks offers plant palettes to maximize climate resilience in park landscapes and engages in climate resilient land management by repurposing green waste as mulch and chip cover.

### POLICY 2.3.2.
### Prioritize nature-based solutions that restore ecosystem function and maximize ecological benefits to plants, animals, and people.

For climate resilience, nature-based solutions offer approaches to restore ecosystem function and maximize ecological benefits. In capital, development, and other projects, incorporate greening and plantings that are climate appropriate, non-invasive, and native species into the building and surrounding infrastructure. Where possible, design solutions that make ecosystem function visible so that relationships between people and nature can be understood, cultivated, and appreciated. For open space projects, it is important to coordinate with the American Indian and Alaska Native community to preserve existing culturally significant areas and ensure access to culturally significant practices, such as harvesting food from the area.

### POLICY 2.3.3.
### Prioritize nature-based solutions as flood adaptation strategies, to enhance shoreline biodiversity and ecological function, manage stormwater, and protect against sea level rise and coastal flooding.

Against the present and increasing threats of sea level rise and flood hazards, prioritize the use of nature-based solutions and green infrastructure to increase climate resilience. The unique characteristics of these water-related hazards present the opportunities for both site-specific and district-scale solutions to manage stormwater and protect against sea level rise and coastal flooding. For greater climate resilience, prioritize nature-based solutions that enhance ecological function, preserve the natural aspects of the shoreline, and reconnect people to these systems.

The nature-based solutions, such as wetlands, should be adapted to the condition of the shoreline. Where possible, consider soft landscape transitions to the bay, ocean, and creeks that maintain public access, especially visual access, to these water features. In areas with limited space for soft landscape transitions, consider vertical strategies such as living or ecological seawalls.

### POLICY 2.3.4.
### Reduce the threat of wildfire to San Francisco residents and infrastructure.

Though the probability of wildfires within San Francisco is low, it remains high for areas outside the county where City-owned infrastructure is located. Significant portions of the Hetch Hetchy Regional Water System in San Mateo, Alameda, Santa Clara, and Tuolumne Counties are located in very high fire hazard lands. Coordinate with Yosemite National Park, Stanislaus National Forest, CAL FIRE, and adjacent communities on risk reduction, and properly care for City-owned land and facilities to reduce wildfire risk.

A small portion of the Crocker Amazon neighborhood has been designated as a high fire hazard area by the State. There are potable water mains and hydrants along the perimeter of John McLaren Park, as well as a 2015 era 75,000 gallon Emergency Firefighting System cistern at the corner of Moscow and Geneva.

### POLICY 2.3.5.
### Educate and empower stakeholders and communities to know, grow, and steward local native plants and wildlife on private and public property.

Property owners and other stakeholders can take the lead in nature-based solutions and urban greening with more support from the City. The City should develop a centralized repository of information and training to increase public awareness of climate appropriate, non-invasive, and native plants and wildlife on private and public property. For public property and open space, it is important to ensure the American Indian and Alaska Native community have access to conduct cultural practices, such as harvesting.

## Goal 3. Hazard Mitigation

The City must reduce the likelihood, scale, and severity of impacts from all disasters to the economy; the built and natural environment; and all communities, starting with reducing such impacts in Environmental Justice Communities.

The climate crisis already adversely impacts San Francisco and influences how people live, work, and play. The climate crisis will accelerate impacts for decades to come. In San Francisco, there are 13 main hazards that have the most potential impact to the City. Of these hazards, seismic hazards pose the greatest direct risk to human life and safety via the failure of buildings and other structures during shaking or ground failure. In addition to tragedy, there will be substantial economic losses and severe social, cultural, and economic dislocations. These same consequences are threats across all other hazards, including slow-moving hazards such as sea level rise and emerging hazards such as poor and hazardous air quality. As the climate crisis worsens, hazards are occurring more frequently, intensely, and simultaneously—with compounding impacts. It is critical to ensure robust levels of safety and resilience relative to all hazards, by learning more about the risks posed to vulnerable communities and developing plans to reduce those risks; and by considering hazards in all land use, infrastructure, and capital planning.

**OBJECTIVE 3.1.**

***EXISTING BUILDINGS.*** **ENSURE RETROFITS AND RENOVATIONS TO EXISTING STRUCTURES INCREASE BUILDING LONGEVITY AND MEET CURRENT BEST PRACTICES TO PROTECT OCCUPANTS AND STRUCTURES.**

## Risk Reduction

### POLICY 3.1.1.
### Reduce the risks presented by City-owned structures and privately-owned buildings and provide assistance to vulnerable communities with limited adaptive capacity to reduce those risks.

Hazards such as earthquakes can cause damage to buildings that render them unsafe to occupy or cause them to collapse. Sea level rise and flood hazards can cause permanent inundation. Poor and hazardous air quality can exacerbate indoor and outdoor air pollution. The City needs a comprehensive approach to address the resilience of all at-risk structures and buildings where people live, gather, and work.

While the City has numerous programs in place to bring public buildings into seismic compliance, addressing privately-owned buildings is a political, legislative, and financial challenge. The Community Action Plan for Seismic Safety (CAPSS) and Earthquake Safety Implementation Program (ESIP) is a 30-year implementation plan to support the City's resilience in the face of probable earthquakes along the San Andreas and Hayward Faults. These programs address seismic risk reduction for many building uses, such as residential and commercial.

The City should create additional action plans and implementation plans to address the range of hazards that are occurring more frequently, intensely, and simultaneously. These actions should address non-ductile concrete frame buildings, old construction in need of retrofits, pre-cast concrete tilt-up buildings, and housing units that serve low- and very low-income residents.

### POLICY 3.1.2.
### Reduce the risk of all hazards, especially geological, weather-related, and fire-related hazards, posed by concrete buildings and older, small, wood-frame residential buildings.

The City's current programs for unreinforced masonry buildings and soft-story wood-frame buildings apply to larger scale and commercial structures. Individual homes or buildings under 5 units are not required to be seismically strengthened. Some individual homeowners make upgrades to their buildings voluntarily, but that number could be substantially increased with more programs designed for safety improvements by homeowners. "Soft-story" buildings, in which the ground story has much less rigidity and strength than the rest of the structure, pose significant hazards. Often, the soft story is the result of multiple garage door openings or ground floor parking. Soft-story failure was responsible for nearly half of all homes that became uninhabitable in the 1989 Loma Prieta Earthquake. Photographs of the Marina District became iconic symbols of the compounded seismic risks from earthquake and liquefaction for housing built on top of landfill, loose, or saturated soils. The City estimates 43% to 85% of un-retrofitted soft-story buildings will be uninhabitable following a major earthquake.

The City should adopt incentives and regulations to encourage relatively simple retrofit approaches that increase the structural stability and safety of smaller wood-frame residential buildings, as well as consider a phased mandate for retrofits over a 30-year timeframe as directed by the Community Action Plan for Seismic Safety and the Earthquake Safety Implementation Plan. The City's Mandatory Soft Story Retrofit Ordinance established an inventory of buildings with five or more units and required their owners to evaluate and retrofit at-risk buildings. This program has been successful, with an 85% compliance rate for buildings that fall within the program's purview. Next, the City should enact a concrete building retrofit program, in accordance with the Earthquake Safety Implementation Plan. Older non-ductile concrete frame buildings and rigid wall flexible diaphragm buildings, aka "tilt-ups" with high-level risk should be addressed.

### POLICY 3.1.3.
### Abate structural and non-structural hazards in City-owned properties.

Both technical and financial resources are needed to repair and retrofit City-owned properties. The City shall use its capabilities to assess hazards and to create and implement bond and other funding opportunities to carry out retrofit projects. Through bond financing, numerous City buildings have already been structurally upgraded.

There still remain important City-owned buildings that present seismic risks, as identified in the 10-Year Capital Plan, Hazards and Climate Resilience Plan, and other studies and plans.

The City's Capital Improvement Advisory Committee (CIAC) acts as the policy body advising the City's capital-planning process. Recognizing that certain kinds of public buildings are critical to the community's functioning, the CIAC should work to establish a clear prioritization for these projects, develop an implementation program for their upgrade including funding sources (such as bond measures), and establish a timeline for the improvements.

### POLICY 3.1.4.
### Encourage property owners to evaluate their risks to all hazards.

Many property owners hold a misguided perception that federal and state sources will provide financial assistance after a disaster. But, federal aid provided in a declared disaster does not protect individual homeowners. When a major disaster hits an entire area, local governments are often strapped with simply providing funds necessary to repair major public infrastructure and buildings.

The City can encourage residents and businesses to evaluate their own risk and the repercussions they might face from reasonably foreseeable hazards. Whether through a formal risk assessment through a qualified consultant or simply through a personal assessment that evaluates the potential for damage, property owners should consider the full range of opportunities for decreasing their risk. This risk should be clearly communicated to tenants, upon sale of buildings, and be made part of public City records.

### POLICY 3.1.5.
### Support the ability to shelter in place and provide help for vulnerable communities with limited adaptive capacity.

The term "shelter in place" refers to people's ability to remain in their home or another place of shelter and stay there until instructed otherwise, due to ongoing hazards outside of the home that threaten health and life safety.

Seismically, for a building to have shelter-in-place capacity, it must be strong enough to withstand a major earthquake without substantial structural or non-structural damage. This is a different standard than that employed by the Building Code, which requires buildings to meet life-safety standards. In some cases, a building may not collapse, but might be deemed unusable because of the level of damage. Shelter-in-place housing standards would mean that a building is safe enough to live in during the months after an earthquake, but it may not be fully functional as a hospital or other public facilities would need to be.

Supporting shelter-in-place capacity can help minimize the need for emergency housing and services post-disaster, keep current residents in their homes, and minimize disruption of society and the economy. This could greatly minimize recovery costs and allow communities to remain intact.

# Historic Preservation

**POLICY 3.1.6.**
**Maintain a data clearinghouse of existing housing and building stock that inventories their features' architectural and cultural character, vulnerability and resilience to all hazards, and other resilience features.**

In order to make holistically-informed approaches and strategies to improve the safety and resilience of the City's housing and building stock, the City needs a complex set of readily available, current, and high-quality data. The data on housing and building stock, including its location, specifications, conditions, and use, is managed by a number of City agencies and private sector actors, making it difficult to conduct research, assess the vulnerability and consequences to hazards, and identify opportunities to increase safety and resilience.

The City should develop and maintain a data clearinghouse that supports existing and projected housing and their interaction with all hazards. This clearinghouse can demarcate types of structures and buildings with known vulnerability to hazards, such as concrete buildings and wood-frame buildings, and denote opportunities for improving resilience, such as removing gas lines. The clearinghouse can utilize property information from past and current building surveying efforts, including the San Francisco Citywide Cultural Resources Survey (SF Survey), as well as existing information found on the Planning Department's Property Information Map.

**POLICY 3.1.7.**
**Starting with properties associated with Environmental Justice Communities, expand life safety and functional recovery considerations to increase the likelihood that historically valuable architecture and structures will survive all hazards, and encourage the adaptive reuse of historic structures.**

Older buildings are among those most vulnerable to destruction or heavy damage from a large earthquake. They are less likely to have more recent engineering features or be built to current codes. This makes these buildings less resilient to ground shaking, and many of them are located in areas near the bay and the historic bay inlets with the City's softest soil conditions. These buildings may also have ornate façade structures that, in the event of an earthquake, can detach and threaten people on the street.

A major earthquake could result in an irreplaceable loss of the historic built fabric and social communities of San Francisco. Part of the City most vulnerable to fire also contains many historic structures. North Waterfront, South Beach, Mission Bay, Potrero Hill, Hunters Point, Civic Center, Downtown, Tenderloin, and Hayes Valley neighborhoods have moderate risk for large urban fires. Additionally, San Francisco's waterfront is lined with historic structures, including historic pier structures, vulnerable to risks posed by current flooding and accelerating sea level rise. Furthermore, stormwater flooding may pose risks to properties more inland in neighborhoods including the Mission, South of Market, and Bayview. The City should mitigate these hazards in a way that preserves the historic structures and fabric of the different neighborhoods.

When new programs are being considered to abate hazards posed by existing buildings and structures, the likely impacts of those programs on historic buildings must also be thoroughly investigated. The resulting programs should encourage the retrofit of older buildings in ways that preserve their architectural and historical character while increasing life safety and functional recovery. When development concessions, transfers of development rights, or City funds are granted to promote preservation of historic buildings, there should be reasonable measures taken to increase the building's resiliency to environmental hazards.

**POLICY 3.1.8.**
**Safeguard diverse elements of the City's living heritage through supporting the protection and/or adaptation of intangible elements and their ties to the City's natural and built environments, which collectively contribute to San Francisco's cultural identity.**

In the event of a hazard, there may be damage to the people, resources, and opportunities that contribute to San Francisco's living heritage. These diverse and intangible elements of living heritage, such as performing arts, traditional crafts, foodways, rituals, and festivals, must be protected and adapted against the threats of all hazards.

After a hazard, the unique materials and supplies necessary for living heritage may be destroyed or heavily damaged beyond function. The opportunities and space to come together and practice rituals and festivals may be lost or deemed unsafe. The people and communities who own, practice, and appreciate acts of living heritage may be lost or displaced.

The City should identify the elements that contribute to San Francisco's cultural identity, as that identity has been and may be evolving over time, and work to safeguard these elements from the threats of all hazards.

# Resilient Retrofits

**POLICY 3.1.9.**
**Reduce hazards from gas-fired appliances and gas lines, removing gas lines when possible, focusing on communities with concentrations of older housing stock.**

In support of the City's goals of becoming a net-zero emissions City by 2040, the City is minimizing reliance on gas and instead electrifying the future. For the remaining gas lines, the City must protect people and assets from seismic, combustion, and related hazards.

A large earthquake is likely to result in fires at a time when the water systems may be disrupted and fire-fighting personnel may be overtaxed. One of the common sources of ignition will be gas leaks from appliances. As part of removing gas lines, support the infrastructure for building electrification. In existing buildings, the San Francisco Lifelines Council recommends the Department of Building Inspection to require electrification with gas shut-off valves as an interim measure to full building electrification.

**POLICY 3.1.10.**
**During building retrofits, follow a comprehensive retrofit strategy to provide support to vulnerable communities, reduce greenhouse gas emissions, and reduce the risk of property loss and damage during wildfires, flooding, and seismic hazards.**

During building retrofits, there is opportunity to address a broad range of hazards at once. In addition to improving building resilience, there are improved protections for human safety and prevention of damage and loss of life. The retrofit strategy should address the main hazards the area is susceptible to, including seismic hazards, sea level rise and flooding, urban fire, and poor and hazardous air quality. Building retrofits, which include weatherization and electrification, are needed to meet San Francisco's goal of net-zero greenhouse gas emissions by 2040.

**POLICY 3.1.11.**
**For existing housing and building stock, provide training, guidance, and assistance to build resilience against extreme heat, poor and hazardous air quality, and flooding, especially in Environmental Justice Communities and other vulnerable people.**

There is a set of emerging hazards occurring more frequently and severely in the City, exacerbated by the climate crisis. These hazards, such as extreme heat, poor and hazardous air quality, and sea level rise and flooding, are challenging existing approaches to make existing housing and building stock resilient to hazards. As compared to new and projected housing units, the existing housing and building stock—especially older stock—often serve as the City's valuable resource of affordable housing.

For housing security and housing that is safe, healthy, and affordable to people, the City should provide training, guidance, and assistance to weatherize and retrofit. For example, the City can address temperature control, indoor air quality, and elevating property. These resources should be targeted to Environmental Justice Communities and other vulnerable people.

**POLICY 3.1.12.**
**Provide guidance and assistance to residents about the risks associated with their home and their options to improve safety as renters.**

San Francisco residents should be informed about the hazard risk profile of their homes and neighborhoods. For existing buildings and new construction, property owners and residents should be notified and informed. The City should pursue policies around mandatory reporting around seismic risk, such as during the time of sale or as permanent notice in building entryways. The City should pair notification with opportunities to learn more, such as pointing to an online directory of hazard and neighborhood profile information and opportunities to increase resilience of housing units.

**OBJECTIVE 3.2.**

***NEW BUILDINGS.*** **MAXIMIZE THE SAFETY, ENVIRONMENTAL PERFORMANCE, AND CLIMATE ADAPTABILITY OF ALL NEW DEVELOPMENT.**

# Hazard Information in Decision Making

**POLICY 3.2.1.**
**Continue to support and monitor research about the nature of all hazards in the Bay Area, including prediction and warning systems, community vulnerability and consequences assessments, and improvements to building performance**

**and resilience.**

Knowledge about hazard risks in the Bay Area is substantial, but always evolving. The City needs to stay informed, through City staff, state and federal agencies like CalOES and the United States Geological Survey, and other professional contacts about advances in the field. New information will be shared with the public and decision makers.

Similarly, new techniques are continually developing in the structural design of structures, and new data is emerging about the actual functional performance of previously retrofitted buildings. For example, the risks of damage to life and property from seismic hazards can be reduced by improved engineering practices. The City should continue to support the institutions, professional organizations, and individuals who carry out research in structural safety. Special attention should be paid to support and seek out research that identifies innovative and low-cost retrofit concepts. Once the City sets new acceptable safety levels, this research should support the engineering requirements to meet safety levels. Similarly, new techniques are continually developing to protect building occupants from poor and hazardous air quality, extreme storms and flooding, and pandemic.

### POLICY 3.2.2.
### Research and maintain information about all hazards, including adverse impacts on vulnerable communities.

The field of disaster research is growing in both scope and recognition. In recent decades, the September 11 attacks in 2001, the Indian Ocean earthquake and tsunami in 2004, Hurricane Katrina in 2005, the Haiti earthquake in 2010, and the COVID-19 pandemic starting in 2019 are major examples. While research into disasters focused primarily on natural disasters through environmental management, newer research strains extend into terrorism and cyber failures, biological and chemical emergencies, and other community-wide crises. They encompass research components such as organizational response to disasters and the social ramifications of hazards, disasters, and large-scale terrorist attacks.

In addition to the science and management of all hazards, the field is increasingly aware of the disproportionate impact of disaster among different groups of people and the need to prioritize attention to the people most vulnerable to risks and consequences. As hazards occur more frequently, intensely, and simultaneously, it is often Environmental Justice Communities and other vulnerable people who experience the impacts of disaster first and more severely, and who take longer to recover compared to the rest of the City. For some people, they have the resources and adaptive capacity to bear a disaster and recover to pre-disaster levels with relative ease. For vulnerable communities, there are higher risks, limited resources, and constrained adaptive capacity, meaning that research on all hazards should account for these dynamics of adverse impact and work to address these community needs.

The Department of Emergency Management should keep abreast of evolutions in this field of research, particularly as new threats emerge and as new methods of mitigating those are developed. The City should also continue grow its partnership with community response teams, such as the Neighborhood Emergency Response Team (NERT) and the Neighborhood Empowerment Network's Empowered Communities Program (ECP). NERT is a community-based training program dedicated to a neighbor-helping-neighbor approach to disaster response. The NERT program trains volunteers to work as members of an emergency response team, preparing them to respond to a personal emergency or assistance to Fire Department response. ECP is a community development approach to neighborhood-level disaster resilience, empowering neighborhoods to develop and implement strategies that strengthen communities during hazard events.

### POLICY 3.2.3.
### Coordinate interagency Citywide efforts to assess the City's vulnerabilities to multiple hazards, such as poor air quality, flooding, and extreme heat.

As the City continues to experience more extreme, more frequent, and more simultaneous hazards, the interagency climate resilience program should be empowered to assess the City's vulnerabilities to a complex set of hazards. The City should develop a citywide assessment, at the neighborhood level, to generate baseline information around the vulnerabilities and consequences to all hazards. This assessment should include impacts on Environmental Justice Communities and other vulnerable people, businesses and the economy, historical and cultural resources, and critical infrastructure. This assessment should support increasing public awareness for emergency preparedness. Currently, there is ClimateSF as an interagency collaboration to advance the City's climate resilience activities, including the Office of Resilience and Capital Planning, Planning Department, Department of the Environment, the Port, and Public Utilities Commission.

### POLICY 3.2.4.
### Ensure foundations and structural systems are designed with consideration of site soils conditions when reviewing projects in areas subject to liquefaction, slope instability, sea level rise, groundwater rise, and other flood hazards.

The Building Code considers soil conditions at a very general scale. But, soil conditions vary enormously throughout the City. Different soil conditions can result in very different earthquake impacts and can result in damage at other times, such as with landslides. Because of the importance of soil conditions, the California Seismic Hazards Mapping Act requires that a geotechnical investigation and geotechnical report be prepared for new or renovated buildings that are constructed in Seismic Hazard Zones.

Pursuant to this act, the Department of Building Inspection (DBI) requires geotechnical reports prepared by a licensed geologist and geotechnical engineer for projects in areas with susceptibility to ground failure, including liquefaction and landslides. DBI has procedures in codes and bulletins identifying when projects are subjected to additional geotechnical review and requirements based on site conditions and/or proposed scope of work to support these efforts.

Additionally, there is ongoing research of the interaction of sea level rise and flood hazards with the potential mobilization of soil contamination.

### POLICY 3.2.5.
### Provide training, guidance, and assistance for the geotechnical and foundation issues unique to tall buildings.

In San Francisco, there is a unique concentration of tall buildings that are 240 feet or taller. These tall buildings have advanced and complex characteristics and demands for seismic safety. Their structural systems preclude generic performance assumptions and prescriptive engineering solutions, and they are increasingly being used to house residents.

Based on the Tall Buildings Study and Earthquake Safety Improvement Program, the City should implement mandatory training and guidance to property managers and tenants around the seismic safety of tall buildings, as well as offer assistance to improve the geotechnical and foundational issues in the event of an earthquake. The Department of Building Inspection (DBI) developed guidelines for preparing geotechnical and earthquake ground motion reports for the foundation design and construction of tall buildings. DBI also requires performance-based structural design reviews for buildings above 240 feet tall (and some building types above 160 feet tall), and they convene an engineering design review team of external consultants to review and advise on proposals of new tall buildings.

As tall buildings are increasingly being used for housing purposes, in addition to business purposes, the City should set up data monitoring to track building use and resident demographics in order to address additional vulnerabilities.

### POLICY 3.2.6.
### Consider hazard information during City decision-making processes about land use, building density, building configurations, and infrastructure.

Land use decisions should be made with hazards in mind. The Planning Commission, the Board of Supervisors, and other City decision makers shall be aware of and consider hazards when making decisions that will affect the types and structures that will exist in the future, including existing and potential structures, land uses and their associated densities, transportation, and other infrastructure.

Changes to the General Plan, Area Plans, and Planning Code should take into consideration the prevalent disasters affecting the City and the effects they may have on the safety of future development. These considerations should balance with other environmental justice and community welfare concerns, ranging from safety to community health to economic security to quality of life.

In order to protect City property, building codes and technical knowledge must be as up to date as possible as new engineering expertise is gained. Keeping abreast of such information and technologies should be a priority for the City.

### POLICY 3.2.7.
### Monitor emerging industries like bioscience and other lab-based sectors, and ensure that state and local codes manage risks effectively.

The City has made it a goal to encourage the bioscience industry, as well as other lab-based industries, in the City because of its economic development potential. The University of California, San Francisco (UCSF) is a generator of life science and bioscience companies, it and has made the Bay Area a center for the industry. The number of companies located or seeking space in the City is expected to grow.

Many medical research laboratories handle biological materials, which may generate radioactive or otherwise hazardous materials and waste. Because of this, bioscience and biotechnology lab facilities in the City are subject to hazardous materials safety regulation by the federal government, state government, and the San Francisco Department of Public Health. Firms are required to generate Hazardous Materials Business Plans including storage and secondary containment policies; Emergency Response Plans; and training plans to educate staff about handling and disposal. Currently, state and federal regulations are adequate and sufficient to govern bioscience activities. In addition, San Francisco has adopted more stringent threshold reporting requirements for labs resulting in greater local oversight.

Lab-based sectors such as bioscience are likely to evolve, and the functions of the firms located in the City may shift. The City should monitor these industries to ensure safety regulations continue to be applicable. The City should encourage performance-based design and engineering technologies to protect the safety of critical research projects, particularly if facilities are vulnerable to hazards.

## Promote Green Building

**POLICY 3.2.8.**

**During retrofits and new construction, prioritize building practices that emit lower greenhouse gasses and build resilience to multiple hazards at once, especially in Environmental Justice Communities.**

When retrofitting existing construction and developing new construction, use the latest building practices to emit lower greenhouse gasses and increase resilience to multiple hazards at once. In Environmental Justice Communities, where there are disparities in the prevalence of safe, healthy, and affordable homes, it is especially important to prioritize low-carbon building practices without jeopardizing housing affordability. In addition to the latest building standards, pursue building electrification, urban greening, low-carbon building materials, weatherization, interactions with the public realm, and other green building practices.

**POLICY 3.2.9.**

**Continue to promote green stormwater management techniques.**

The City has an abundance of impervious surfaces. Buildings, streets, parking lots, and other paved surfaces prevent the absorption of rainfall, so low-lying areas of the City are particularly susceptible to flooding in heavy rains. In addition, urban stormwater runoff can be highly polluted, and pollutants that go down storm drains can have negative impacts on the sewer and storm system, contributing to system overflows. Natural systems can often be an effective supplement, helping to absorb the overflow and filter out pollutants from that runoff.

Building and site development should include natural systems wherever possible. Natural vegetation, landscaped swales, and gardens included in site designs can reduce, filter, or slow the spread of stormwater runoff. “Green streets” that include pervious concrete, planters, and landscaped strips adjacent to sidewalks can assist the City’s sewer discharge capabilities. Green roofs incorporated into buildings provide another method of absorption. Similarly, sustainable construction techniques can be used to mitigate against the effects of future disasters. Green building technologies now allow for buildings that can provide their own power and filter their own water from runoff. This helps reduce two problems associated with disasters, the need for power and the need for potable water.

The City needs bolstered flood control structures and flood proofing to respond to the anticipated impacts of extreme storms. To prepare, the Public Utilities Commission can continue upgrading the City sewer system, and also critical are more imaginative solutions, like capturing stormwater for irrigation, increasing urban forestry activities, and other green uses.

**OBJECTIVE 3.3.**

***INFRASTRUCTURE AND PUBLIC REALM.*** **ENSURE THE CITY’S LIFELINE SYSTEMS, TRANSPORTATION AND EMERGENCY RESPONSE FACILITIES, UTILITIES, STREETS, PUBLIC SPACES, AND COASTS CAN WITHSTAND AND ADAPT TO ALL HAZARDS.**

## Public Assets and Awareness

**POLICY 3.3.1.**

**Reduce the risk of all hazards to community facilities and lifeline infrastructure, starting with Environmental Justice Communities.**

For safety and resilience, community facilities and lifeline infrastructure serve as key assets in emergency management. Many types of community facilities can be areas for refuge and evacuation, storing and distributing disaster supplies, and providing critical services like medical care. Community facilities provide public services, such as public schools, childcare facilities, fire stations, police stations, recreation centers and parks, public and non-profit health facilities, libraries, arts and culture facilities, social welfare facilities, and facilities serving the homeless. In addition to facilities supported by the Community Facilities Element, the City can coordinate with other institutions such as private schools and places of worship. Identify the network of these facilities, assess their vulnerability and consequences to hazards, and create a set of strategies to mitigate harm so that these are available and functional to the community during disaster.

**POLICY 3.3.2.**

**Identify and replace vulnerable infrastructure and critical service lifelines in high-risk areas.**

In the event of a disaster, two of the most critical networks will be the City’s water system and its sewer and sanitation lines. Upgrades are already underway: the San Francisco Public Utilities Commission (SFPUC) and Public Works have ongoing programs to replace vulnerable water mains and sewers and to improve performance of the systems during earthquakes—by including system segmentation, safety shut-off systems, and redundant back-up systems or other methods of reducing damage—and providing alternative sources of service. SFPUC is undertaking a Water System Improvement Program to strengthen the Hetch Hetchy water transmission system against earthquake damage. A connecting pipeline is currently under construction to connect the region’s major water supply systems of the Hetch Hetchy, managed by the SFPUC, and the reservoirs in Calaveras, Amador, and Alpine counties managed by the East Bay

Municipal Utility District (EBMUD), which will enable water to be distributed from one Bay Area system to another in the case of failure. However, aging infrastructure in the City's sewer and sanitation system is a concern—beyond ailing pipes, the City's tunnels, pump stations, and treatment plants need upgrades and repairs. The San Francisco Sewer System Master Plan project currently underway at the SFPUC will eventually provide a detailed roadmap for these major improvements and provide a plan for funding these improvements.

Other upgrades underway include Pacific Gas and Electric's seismic program replacing vulnerable gas lines, and Caltrans' bridge and highway retrofit programs. BART is in the midst of a system wide seismic upgrade project; the City should lobby for continued seismic retrofit and disaster-resistance measures on our regional transportation systems such as Caltrans and AC Transit. More upgrades are needed to PG&E's electric system to reduce the risk of service disruption to customers, including transmission improvements, replacement of vulnerable transformers, circuit breakers, and other at-risk components of the electric system. The City should require a specific plan detailing these improvements, and a timeline for their implementation.

**POLICY 3.3.3.**

**Conduct capital planning to advance resilient infrastructure prioritizing life safety and functional recovery, as well as the needs of Environmental Justice Communities and other vulnerable people.**

In capital planning, incorporate environmental justice analysis of community facilities and other critical infrastructure that serve, impact, and are more used by Environmental Justice Communities and other vulnerable people. Community facilities provide public services, such as public schools, child-care facilities, fire stations, police stations, recreation centers and parks, public and non-profit health facilities, libraries, arts and culture facilities, social welfare facilities, and facilities serving the homeless. With community outreach and engagement, listen to resident needs and priorities of their built environment and public realm. Explore how public infrastructure projects can limit environmental justice burdens and improve outcomes for active transportation, open space access, and climate resilience.

**POLICY 3.3.4.**

**Where there are ongoing and known plans for future public infrastructure projects, consider prioritizing maintenance of public access and protecting the public rights-of-way above the needs of private property and development.**

Public infrastructure projects often depend upon the system of public rights-of-way for accommodation. For this reason, the City should prioritize maintaining and protecting the public rights-of-way, above and below street level, for future public use. The City should refrain from issuing encroachment permits to private development without considering these priorities.

For certain public infrastructure projects to deliver lifeline and other public services, they can be so large and complex that they cross multiple jurisdictional boundaries and rights-of-way between public and private spaces. The City must protect the public-rights-of-way, especially above the needs of private development projects, to have a space to deliver public services. Ensure that private encroachment permits do not interfere with future public infrastructure projects.

**POLICY 3.3.5.**

**Provide training, guidance, and assistance for nearby communities most impacted to potential threats and consequences to public assets and infrastructure within the Sea Level Rise Vulnerability Zone.**

In the Sea Level Rise Vulnerability Zone, over six percent of the City's land (about four square miles) could be inundated by temporary or permanent flooding by 2100. This will affect people, jobs, and vital infrastructure in the City. There are public assets and infrastructure like the Muni yard and San Francisco Public Utilities Commission water stations that are at risk. The City should develop training, guidance, and assistance to communities in and adjacent to the vulnerability zone on how these assets may be affected and how their lives may be impacted. These resources should increase the City's understanding of how sea level rise and inundation is a potential threat and consequence to the vulnerable communities; increase communities' understanding of adaptation efforts underway; how to stay involved; increase adaptation capacity; and decrease disruptions in service.

## Resilience to Future Hazards

**POLICY 3.3.6.**

**Maintain research, monitoring, and guidance related to earthquakes, sea level rise, and flood hazards to inform a framework for future investments and development.**

In San Francisco, earthquakes are the greatest hazard risk to life and property due to the San Andreas and Hayward Faults. Within the next 30 years, the probability of the San Francisco Bay region experiencing an earthquake measuring magnitude 6.7 is 72%. Unlike other hazards, earthquakes strike without warning. Even if the next earthquake was accurately predicted with a week's warning, without advance planning and action, there are tens of thousands of seismically vulnerable buildings throughout the region that would be

severely damaged or collapsed. On the other hand, sea level rise is a slow-moving threat that also demands immediate action. By 2030—without taking any adaptation actions—the City is at risk of sea level rise negatively impacting 5,000+ residents, 10,000+ jobs, 200+ acres of open space, and other communities, buildings, and assets.

The City needs to learn more about the evolving science of earthquakes, sea level rise, and flood hazards, monitor the impacts and potential threats to the people and assets of the City, and guide adaptation and response activities to these hazards. It is especially important to understand the interactions of these hazards, and with other hazards like biological hazards (e.g., hazardous materials), to inform effective investment and development of strategies for resilience.

### POLICY 3.3.7.
### Support the development and updates to building, planning, and other municipal code requirements that meet City climate and seismic resilience performance goals.

The design and construction methods used in buildings are critical to community safety and resilience. At regular intervals, use best practices to review and amend all relevant public codes to incorporate the most current knowledge of structural engineering regarding seismic risks; design and site new buildings considering flood and sea level rise elevations; and green building practices relative to best biologic and ecosystem processes.

Among U.S. cities in areas of very high seismic hazard, the City is unique because of its geography, urbanization, and reliance on public transportation. Current seismic codes ensure that new buildings are earthquake- and fire-resilient, and protect people inside buildings by preventing collapse and allowing for safe evacuation. However, current code requirements do not necessarily limit damage to a structure, or ensure its function post-earthquake. Damage to new buildings and developments can have magnified impacts that affect adjacent structures and the City's lifelines.

A number of factors support the idea that new and retrofitted buildings in the City should be built for better seismic performance than the default level provided by the current Building Code. Consider creating tiered, "enhanced" levels of seismic performance that are performance-based by offering incentives such as priority processing (similar to a LEED certification for sustainable design).

There are additional nature-based solutions that support the built environment's contribution to enhanced natural ecosystem function. Consider higher floor elevations, softscape and natural buffers, and other flood proofing approaches within the Sea Level Rise Vulnerability Zone. Use the latest climate resilient expectations in the Building Code.

### POLICY 3.3.8.
### For new construction and public assets, consider resilience measures against future climate projections and other hazards, beyond current life safety expectations in building codes.

Many hazards, such as sea level rise and extreme heat, are occurring more frequently and intensely. The research shows nonlinear projections of how these hazards occur and impact the City. While building codes prioritize life safety and seek the latest best practices, the Safety & Resilience Element encourages resilience measures in new construction and public assets to act aggressively against all hazards and their future climate projections. As the climate crisis worsens, it is beneficial to act out of an abundance of caution to protect the safety and increase resilience of people and assets. The City encourages utilizing resilience measures that may not be reflected in building codes yet or may not yet have been applied.

### POLICY 3.3.9.
### Design and utilize open spaces considering their use as emergency gathering areas, floodable spaces, and ecosystem services, per the Recreation and Open Space Element.

For certain hazards, such as earthquakes, flooding, pandemic, and extreme heat, open spaces in the public realm can serve as critical spaces for emergency gathering (evacuation, shelter) and buffers (retreat). Per the Recreation and Open Space Element, design and utilize open spaces to act as emergency gathering areas that are low-risk, flexible use, and resilient. Additionally, these open spaces along and near the ocean and bay shorelines can serve as floodable spaces as part of nature-based solutions to sea level rise and flood hazards.

### POLICY 3.3.10.
### Identify and maintain emergency access areas and potential evacuation routes to support capacity for future emergencies and evacuations.

During certain disasters, the City must maintain an essential transportation network to facilitate disaster response and safety. Public Works maintains an Emergency Priority Route Map which is integrated into the Department of Emergency Management's Emergency Response Plan. The map identifies a priority route network for City agencies to conduct damage assessment and maintain critical facilities and services post-disaster, such as a major earthquake.

For evacuation needs, the City must also maintain the safety and function of streets and roads to activate as evacuation routes and emergency access areas at any time. These transportation corridors will need to support an influx of users and maintain structural integrity and function during a large earthquake or other disaster. As part of identifying potential evacuation routes, the City must identify accessibility needs of people with limited mobility options and other vulnerable people, such as people with disability, access, and other functional needs.

Where known, consult with relevant authorities governing major transportation corridors and access areas to ensure all levels of government are aware of the current and future capacity expectations for safe evacuation. These activities should include sub-surface, ground, air, and water transportation routes.

## OBJECTIVE 3.4.

## *SPECIFIC HAZARDS.* IDENTIFY AND PURSUE PROGRAMS AND PROJECTS THAT MITIGATE AND SAFEGUARD AGAINST MULTIPLE HAZARDS ACROSS MULTIPLE ASSETS, ESPECIALLY FOR ENVIRONMENTAL JUSTICE COMMUNITIES AND OTHER VULNERABLE PEOPLE.

### POLICY 3.4.1.
### Assess, mitigate, and provide holistic information about all hazards affecting the City, as identified in the Hazards and Climate Resilience Plan.

The City should advance research and understanding of all hazards and their impact to the people and assets of San Francisco. The Hazards and Climate Resilience Plan (HCR) serves as the City's Local Hazard Mitigation Plan (LHMP). The City should work with the academic community, appropriate government agencies, and other stakeholders to assess the threat and impact of the 13 main hazards to the City. Coordinate this basic research with the appropriate data clearinghouses in the City that relate to achieving racial and social equity, public awareness, and informing decisions around capital planning and development.

These hazards include geologic hazards (earthquake, tsunami, landslide, and dam or reservoir failure), weather-related hazards (flooding, high wind, extreme heat, and drought), fire-related hazards (large urban fire, wildfire, and poor air quality), and biologic and toxic hazards (pandemic and hazardous materials).These hazards can include the latest emerging hazards that may not be reflected in the Hazards and Climate Resilience Plan, such as sea level rise and noise pollution.

### POLICY 3.4.2.
### Protect against the risks of using, storing, and transporting hazardous materials and increase public awareness, particularly in areas prone to seismic and flooding risks.

The City should coordinate with the appropriate regulatory and monitoring agencies for the use, storage, and transportation of hazardous materials. The location of hazardous materials, existing and potential, should be in areas resilient to seismic and flooding hazards to minimize the spread as an environmental pollutant and threat to public health. Where hazardous materials are close to people, and critical assets like the water table, the public should be notified and empowered to seek more information and resources to protect health and safety.

### POLICY 3.4.3.
### Educate the public about hazardous materials procedures, including transport, storage, and disposal.

Hazardous materials include chemical, biological, radiological, nuclear, and explosive substances (CBRNE). Accidents such as toxic releases from facilities and vehicles, fires and explosions caused by chemical releases, and oil spills in the bay are not uncommon. There is also increasing awareness and research about the mobility of hazardous materials during inundation and flood hazards, particularly towards the groundwater table. The Federal Emergency Management Agency (FEMA) has estimated that an average of 60,000 accidents and over 200 deaths involving chemicals occur in this country every year. The City should support research about the interaction of toxic substances with groundwater threats.

Several of the City's agencies provide businesses and residents with information about safe disposal of hazardous materials, primarily the Fire Department and Department of Public Health. The City's Fire Department is responsible for administering local safety regulations for business operating with hazardous materials, and it is the first responder to chemical and hazardous spill accidents. The Fire Department is also the point of contact for risk/hazard assessments, capability assessments, and detailed response planning. The Department of Public Health enforces state and City environmental health laws, including hazardous materials storage; issues hazardous materials use permits; and investigates illicit discharge and disposal of hazardous materials.

For common CBRNE hazards at the household-level, the Neighborhood Emergency Response Team (NERT) educates the community about their indicators and safe disposal methods. The Public Utilities Commission also provides residents and businesses with information (through ads and website resources) on how to properly dispose of hazardous materials including waste oils, such as motor oil.

**POLICY 3.4.4.**

**Develop a plan for supporting Environmental Justice Communities and other vulnerable people during Sheltering-in-Place activities, to protect from poor and hazardous air quality, pandemic, and other hazards.**

During a disaster, sheltering in place may be necessary to social distance, prevent the spread of disease, protect from threats to health and safety, and support public health. Sheltering In Place requires safe, healthy, and affordable housing be available to all. It limits the ability for people to conduct their routine behaviors for living and working, such as grocery shopping, going to work, and going outdoors for physical and mental health. The City should develop a plan for supporting Environmental Justice Communities and other vulnerable people during shelter in place, including assessing information and resource needs, culturally competent communication, outreach of public services, and disaster supplies.

**POLICY 3.4.5.**

**Prepare for efficient and equitable responses to medical emergencies and pandemics.**

On January 21, 2020, the City activated its Emergency Operations Center to support the response to COVID-19 and coordinate with active Department Operations Centers. Mayor Breed's early decision to proclaim a local emergency was instrumental to San Francisco's ultimate success responding to the pandemic, allowing City agencies to enact emergency procedures that helped save lives. As of December 2021, the City continued to have the lowest cumulative per capita COVID-19 mortality rate among other large jurisdictions.

The COVID-19 Pandemic Response After Action Report outlined the strengths of the City's response and suggested further updates to enhance the City's emergency response plan. In addition to early and rapid action, the City's successful response can be attributed to the unified priorities, pooled resources, and clear communications that came from the coordinated COVID Command Center, as well as the flexibility and capacity provided by the Disaster Service Workers. Specifically, improvements should focus on increasing racial and social equity in the community, improving the City's Disaster Service Worker program, and providing further clarity and streamlining to both the organization of response services and procurement of disaster supplies.

For all future pandemics and other medical emergencies, the City should create an advance plan to prepare for a similarly successful early and rapid response. This plan should include the disease testing and response capacity of hospitals; disaster supply needs at the household, neighborhood, and citywide level; community health capacity of community facilities; and accessibility capacity of public information. The City should ensure the public is kept well informed about evolving information regarding the public health emergency. The City should ensure systems are in place to ensure continuity of public services, such as public transportation and utilities service with staff absences. The City should solidify plans to ensure access to a stockpile of emergency services to use and distribute, such as medicine and protective equipment.

**POLICY 3.4.6.**

**Assess and mitigate the risk of flooding by incorporating the Flood Insurance Rate Map for San Francisco and related programs.**

The National Flood Insurance Program (NFIP), managed by the Federal Emergency Management Agency (FEMA), provides low-cost flood insurance for communities that adopt floodplain management programs to help mitigate flood losses and damages. FEMA uses the Flood Insurance Rate Map (FIRM) to identify areas with 1% annual chance of flooding, and it uses this as the basis for insurance rating.

FEMA approved the City's application for participation in the NFIP in April 2010, and subsequently, the City has amended the 2008 Floodplain Management Ordinance in order to meet NFIP requirements. The established flood damage reduction program provides homeowners and other property owners the opportunity to purchase federally-subsidized flood insurance at affordable rates. FEMA issued a preliminary FIRM for San Francisco in 2007. The final map and ordinance was adopted in 2020.

The Floodplain Management Ordinance requires the first floor of structures in flood zones to be constructed above the floodplain or to be flood-proofed with variances for exceptional circumstances. The map, as proposed, would designate portions of waterfront piers, Mission Bay, Bayview Hunters Point, Hunters Point Shipyard, Candlestick Point, and Treasure Island in coastal flood hazard zones, which may have implications for development plans and insurance requirements in those areas.

To mitigate against potential risks, the City should maintain NFIP participation and use the information provided by FEMA to engage in additional floodplain improvements to at-risk areas. The City should continue to implement ordinance requirements for new construction, address flood hazards in wastewater projects, and pursue ordinance requirements for substantial improvements projects located in Special Flood Hazard Areas.

**POLICY 3.4.7.**

**Support retrofitting measures for historic buildings vulnerable to current or future flooding, while respecting architectural and historic character, consistent with pertinent local or federal design guidelines.**

Consistent with design guidelines at the local and federal levels, address the unique retrofitting measures required for historic buildings that are vulnerable to sea level rise and flood hazards. The U.S. Secretary of the Interior issued flood mitigation design guidelines for historic properties, and the City can explore additional design guidelines that respect the architectural and historic character that is vulnerable to damage.

# Goal 4. Emergency Preparedness

Ensure San Francisco's residents, workers, and visitors have the knowledge, capacity, and government support needed to be safe in the face of disasters. The City must be prepared to respond quickly and effectively in the case of a disaster. In order to meet the needs of its people and assets after a disaster, response, recovery, and reconstruction plans must be prepared in advance to the extent possible. The City must have the coordination necessary to execute them rapidly. In addition to readying its own agencies and departments, the City must ensure all people are aware and prepared for the possibility of disaster. State and local emergency responders advise people to be prepared for a minimum of 72 hours of self-sufficiency after a large earthquake. Achieving preparedness is even more critical for vulnerable populations and those in geographic areas and building types that are more vulnerable to earthquake damage.

**OBJECTIVE 4.1.**

## *AWARENESS AND CAPACITY BUILDING.* INCREASE THE UNDERSTANDING AND TRAINING OF EQUITABLE EMERGENCY PREPAREDNESS TO ALL HAZARDS AMONG ALL GOVERNMENT, PRIVATE, AND PUBLIC SECTORS.

### POLICY 4.1.1.
### Provide ongoing emergency preparedness and response training to all City employees and other responding agencies.

Under state law, all public employees are designated Disaster Service Workers. At any time during an emergency that results in conditions of disaster or in extreme peril to life, property, and resources, City employees could be assigned to any disaster service activity that promotes the protection of public health and safety. The Department of Human Resources (DHR) manages the City's Disaster Service Worker Program, which includes mandatory training for all City employees. The Department of Emergency Management (DEM) is responsible for ensuring that City employees are trained to perform as needed under the City's emergency plans.

The City should also continue to hold multi-agency drills on a regular basis to test and refine emergency plans. During the COVID-19 pandemic, the Disaster Service Worker Program was a vital source of staffing for the Emergency Operations Center and for responding to community needs. DHR, in consultation with DEM and other City agencies, should continue to refine the Disaster Service Worker program so that is deployed equitably continues to be used effectively to bring response activities to the community.

### POLICY 4.1.2.
### Promote greater public awareness of disaster risks, personal and business risk reduction, and personal and neighborhood emergency response.

People and organizations that are well informed about possible disasters can take effective private measures to reduce their vulnerability to risks. They can also increase their effectiveness in responding to a disaster and helping others when public agencies are overwhelmed. Several of the City's agencies, including the Department of Emergency Management, the Fire Department, the Police Department, Public Works, and the Department of Building Inspection, provide information to the public on what to do in a disaster. As an example, the Fire Department administers the Neighborhood Emergency Response Team (NERT) to deliver on these goals. The Department of Building Inspection maintains a list of earthquake information and emergency power shut down information at its public reception and on its website.

However, information access can be increased beyond these sources, especially to reach populations who may be less familiar with the City system and are less frequent visitors to City buildings. Materials should be placed in everyday materials such as newspapers; alternative venues such as social clubs, community facilities, or service agencies; and distributed via mobile sources at gatherings such as fairs and festivals. Information should be available in large print and on audio cassette for the visually impaired, as well as in a variety of non-English languages.

### POLICY 4.1.3.
### Create a consolidated website linking all the City's disaster-related information for the public and ensure distribution of the information through offline outreach that is accessible and equitable to all people.

Just as the responsibilities for disaster planning programs is distributed among many agencies and departments within the City, the related information about those programs and operations is dispersed. Much information is housed within the agencies responsible, and it can be difficult for the layperson to access all the information that exists.

The City should utilize technology to redress this issue—a simple solution would be to bring together all the varied information that exists into one website. This site should contain links to hazard maps of geologic hazards and soil conditions; to the City's adopted emergency response plans and other related plans and documents; to programs such as Building Occupancy Resumption Program (BORP) and Neighborhood Emergency Response Team (NERT); to programs for property owners, incentives, and other action items; and to information about emergency services and locations. It should map relevant public information such as drinking areas, evacuation routes, emergency transport pick-up locations and locations of Public Information Centers to be set up in an emergency.

This consolidated website should be accessible to equitably reach all people, through availability on both web and mobile platforms, translation into many non-English languages, and accessible to screen readers.

### POLICY 4.1.4.
### For pandemic preparedness, develop a framework of healthcare management that combines the City's physical assets with social and management tools to better respond to public health emergencies.

The COVID-19 pandemic transformed society overnight. It rapidly altered how people interacted with one other and the built environment, as society wrestled with how to apply public health principles to stop the spread of the virus and prevent further loss of life. Building on these lessons from COVID-19, as well as other infectious diseases, the City should develop a comprehensive framework of healthcare management that includes physical and intangible resources to maximize public health outcomes. For physical assets, there are medical institutions, public infrastructure, and land use patterns. For intangible resources, there is social cohesion (strength of relationships and sense of solidarity among community members), trust in government, and socio-cultural factors. These two groups of assets can be managed holistically to manage the transmission and control of infectious disease and maximize public health outcomes.

## OBJECTIVE 4.2.

## *CITY AGENCY CAPABILITIES.* PLAN FOR THE OPERATIONAL, DATA, AND LOGISTICAL CAPACITIES NEEDED TO FACILITATE COMMUNITY SAFETY DURING THE RESPONSE, RECOVERY, AND RECONSTRUCTION PHASES OF ALL HAZARDS.

# Water and Energy

### POLICY 4.2.1.
### Ensure potable water is available in an emergency.

The San Francisco Public Utilities Commission (SFPUC) has various strategies for supplying and/or distributing alternative water supplies during an emergency. Emergency disinfection may be necessary. The California Department of Public Health has issued guidelines for the use of alternate water sources and the issuance of Unsafe Water Alerts and Boil Water Orders. Usage of alternative water supplies will require coordination with appropriate agencies, such as San Francisco Department of Public Health, California Department of Public Health, San Francisco Fire Department, and others.

At the supply and source level, SFPUC has redundancy of sources under the operational responsibilities of Water Enterprise and Operating Divisions. These include Upcountry reservoirs, East Bay reservoirs, Peninsula reservoirs, and local groundwater. At the treatment level, SFPUC has plans and procedures for responding to treatment issues and disruptions. At the distribution level, SFPUC maintains a range of equipment and procedures for alternate delivery. Equipment includes water trailers, portable disinfection units, and 40 hydrant distribution manifolds. Manifolds, water trailers, and other equipment is stored at either CDD Corporation Yard or storage facility at University Mound. Bottled water is identified as a needed alternate water strategy, and supplies and distribution points would be coordinated and acquired at the City Emergency Operations Center level, through citywide logistics.

The SFPUC has installed 6 groundwater wells on the westside of San Francisco. The groundwater wells currently pump less than 1 million gallons per day (mgd) and is expected to increase to 4 mgd by 2030. Additionally, SFPUC is studying the opportunity to produce and serve purified water in San Francisco.

### POLICY 4.2.2.
### Ensure renewable energy sources are available for redundant energy in the event of an emergency.

More frequently, the threat of Public Safety Power Shutoffs (PSPS) is affecting San Francisco. The increased frequency of wildfires occurring at the regional and state levels pressure PG&E to turn off power lines during high winds or dry conditions. Fortunately, San Francisco is less likely to experience a PSPS compared to other jurisdictions due to the lower likelihood of wind-induced fire events with

the City and its location on the transmission grid. However, the disruption in energy service is an inconvenience and threat to wellbeing that should be addressed through resilience of the energy grid.

There are many people who rely on continuous, affordable energy for their health and safety, such as storing life-saving medication and motorized wheelchairs. There are also public assets and infrastructure that relies on energy for safety and function, such as broadband internet and traffic lights. PSPS events occur due to a number of potential hazards, such as high winds, drought, and wildfire. The City should pursue strategies for redundant energy sources and use in the event of an emergency, and seek renewable sources of energy that do not contribute to the climate crisis. The City should continue to work with relevant government agencies, the private sector, and other stakeholders to assess capacity to generate, store, and distribute renewable energy for essential lifeline and recovery activities.

### POLICY 4.2.3.
### Continue to expand the City's fire department prevention and firefighting capability with sufficient personnel and training.

The City faces risk from fires associated with earthquakes. A great number of structures were lost in the 1906 earthquake, not due to the ground shaking itself, but because of the spread of fires that were difficult to battle in the aftermath of the quake. Fires continue to be a great threat, particularly in densely developed areas.

The supplemental water supply systems have been extended and strengthened since the Loma Prieta earthquake, including the Auxiliary Water Supply System, the Portable Water Supply System, cisterns, Bay water suction devices, and fire boats. Staffing and equipment needs of the Fire Department must be foreseen in advance and met. The City needs to improve water supply systems to cover those neighborhoods not served by the Auxiliary Water Supply.

The Fire Department should consider expanding the scope and training of Neighborhood Emergency Response Training (NERT) to include fire suppression, fire reporting, and other neighborhood recovery assistance, and consider coordination with neighborhood-level disaster planning.

## Disaster Response

### POLICY 4.2.4.
### Ensure the City's designated system of emergency access routes is coordinated with regional activities for both emergency operations and evacuation.

After a large earthquake or other disaster, it is likely that many streets will be impassable. This will make firefighting and other emergency response actions more difficult, hinder the movement of people, and interfere with debris removal and other short-term recovery activities. In order to support post-disaster transportation movement, Public Works has developed priority routes for opening during an emergency or disaster. These routes include routes which connect fire and police stations, hospitals, and other critical facilities; routes to emergency drinking water distribution sites and City shelters; and routes to staging areas for disaster service work around the City. These routes enable the necessary clearance width for emergency vehicles and support trucks, and they have been prioritized for debris clearance immediately following a disaster.

The City should ensure that the regional sequence of clearance activities is coordinated to connect with these priority routes, and that the route openings are well-timed to sync with the opening of bridges and regional highways. This coordination can be directed using information from the Transportation Management Center (TMC) staffed by Caltrans, California Highway Patrol, and MTC, specifically its Emergency Operations Center (EOC) which was created for procedural disaster management. In addition, the Regional Emergency Operations Center (REOC) Transportation Branch will distribute a transportation service plan which shall include information related to regional evacuation and route openings. For Caltrans District 4, the EOC is activated to serve as the central location to manage and coordinate responses to major incidents/disasters affecting State transportation facilities.

### POLICY 4.2.5.
### Utilize the City's and region's transit network to facilitate response and recovery during and after a disaster.

The transit network—bus, rail, freight rail, transit, ferry, and air—will be a critical component of response during a disaster. As dependence on cars will not work well in a state of emergency, the transit network will be a critical component of response during a disaster. The City's vehicular network is limited by bridges and freeways with little redundancy; damage caused by the event to roadway networks, security considerations, and traffic control may require the restriction of private automobile use for months after the event. As of 2022, one in five residents in San Francisco does not have access to a personal vehicle and will require public transportation to access essential services. The transit network provides safe and efficient use of resources and is capable of moving significant numbers of people and equipment with relatively few resources. The San Francisco Municipal Transportation Agency has emergency reserves of fuel and is able to continue operations even when the region faces significant disruption.

Transit may be used in emergency situations to move emergency workers and deliver equipment to sites. Evacuation plans should incorporate public transportation to efficiently evacuate people quickly and efficiently without snarling roadways and impeding emergency operations.

Immediately following a disaster, the City should utilize its transit network to restore mobility—to help bring evacuees back to their neighborhoods, to move daily workers to jobs, and to resume day-to-day life. Coordinated transit services can be used to provide long-range links across counties. Additional temporary transportation improvements such as limited stop buses, bus-only lanes, and the addition of high-occupancy vehicle lanes may help relieve overtaxed freeway segments. The clear conveyance of route information and service maps, such as real-time road safety conditions and available public transit options, can help connect riders to services.

The Bay Area region, under the leadership of a task force that includes the CalOES, Caltrans, the Metropolitan Transportation Commission (MTC) and Bay Area transportation agencies, has developed a Trans Response Plan (TRP). The TRP sets out a framework for a coordinated, multi-modal, and timely response by Bay Area transportation providers to a major earthquake or other significant emergency in the region. The resulting procedures are tested on an annual basis through tabletop or functional exercises. The procedures have also been integrated into individual operator emergency plans so that the regional response can be automatically invoked, if needed.

The City, in cooperation with MTC, also has plans that address immediate emergency transportation needs, and the day-to-day transportation routes that will need to be reinstated in order for the region's activities to resume. The Transportation Coordination and Recovery Plan (TCRP) focuses on emergency transportation, evacuations, and the movement of emergency workers. The Regional Transportation Emergency Management Plan (RTEMP) addresses how agencies will coordinate with each other to assist with the movement needs of the public following a major disaster. Together, the two plans are expected to result in a single, unified program to direct the region's transportation resources.

**OBJECTIVE 4.3.**

***CITYWIDE COOPERATION.*** **CREATE PROACTIVE PLANS AND PROGRAMS TO PREPARE READINESS AND COORDINATION FOR ALL DISASTERS.**

## Emergency Management

**POLICY 4.3.1.**
**Bolster the Department of Emergency Management's role as the City's provider of emergency planning and communication, and prioritize its actions to meet the needs of San Francisco.**

The Department of Emergency Management (DEM) has responsibility for developing the City's Emergency Response Plan, annexes, and other emergency plan elements; supporting the coordination of the response and recovery agencies; providing emergency training opportunities; conducting and advising on functional and discussion-based exercises, coordinating activities with regional, State and federal agencies; and maintaining the Emergency Operations Center. This agency must be maintained at an appropriate level, with sufficient personnel and resources to carry out these tasks.

The agency also manages Homeland Security Grants disbursed by the federal government. In recent years, the City has been the recipient of a significant amount of homeland security funds, most of which were targeted for urban centers. In the future, DEM should work with the state to improve its homeland security spending, to ensure that grant money can be effectively utilized and will not revert back to the federal government.

**POLICY 4.3.2.**
**Support the Emergency Operations Center and continue maintenance of alternative operations centers in the case of an emergency.**

The City's Emergency Operations Center (EOC) is designed to serve as a secure well-equipped location for centralized communications and direction. This center houses the Department of Emergency Management, including its Division of Emergency Communication, and consolidates 911 calls and Fire, Police, and Medical Dispatch. It is managed by the Department of Emergency Management.

However, emergency centers may be destroyed or rendered inaccessible in a major catastrophe. The City should prepare for this possibility in advance, by ensuring duplication of information and systems in multiple locations, by identifying alternative sites for temporary EOCs, and by establishing a mobile command center with the necessary technology and information infrastructure for flexible operations.

**POLICY 4.3.3.**
**Ensure all response plans are coordinated with the Disaster Council.**

The San Francisco Disaster Council is the City's central body for emergency planning, and it has been accredited by the California Emergency Council. The Disaster Council is codified by the San Francisco Administrative Code, Chapter 7. The Disaster Council is chaired by the Mayor and composed of the Director of Emergency Services, key department heads and City officials, three members of the Board of Supervisors, and representatives of private organizations having official emergency responsibilities. The Council reviews the efforts of the Emergency Response Planning Task Force and recommends emergency actions such as mutual aid plans and for adoption by the Board of Supervisors.

In order to coordinate the actions of the various agencies throughout the City, the Disaster Council should serve as a central repository for all hazard mitigation, preparedness, and response and recovery activities. The Disaster Council, through its contact with the State Emergency Council and the several local disaster councils within this metropolitan area, can ensure that the work of the City is coordinated with those of the surrounding region. All actions recommended by the Safety & Resilience Element, and developed in other efforts or documents, should be brought forth to the Disaster Council for their review and approval.

**POLICY 4.3.4.**
**Maintain and implement a comprehensive, current Emergency Response Plan with neighborhood-level detail on equitable implementation to guide the response to disasters.**

The Emergency Response Plan (ERP) ensures that the roles of City agencies and others are well defined, in compliance with applicable state and federal regulations. The ERP utilizes an all-hazards approach to emergency planning and encompasses all natural and human-made hazards applicable to the City. Specifically, the ERP identifies and describes City interactions with regional, state, and federal entities; the role of the San Francisco Emergency Operations Center (EOC); and the coordination that occurs between the EOC and City agencies. The ERP should include the responsibilities of Equity Officers and neighborhood-level planning to ensure equitable outreach. There should be periodic functional and discussion-based exercises of the ERP to test plans and identify gaps in emergency management practices.

**POLICY 4.3.5.**
**Maintain and implement the San Francisco Disaster Debris Management Plan.**

The City's Emergency Response Plan includes a response strategy, identifying post-disaster debris management as a key function. The Post Disaster Debris Management Plan establishes a strategy for removal and disposal of disaster debris. Designating appropriate temporary and permanent disposal sites as part of this plan is critical for long-term land use planning.

Post-disaster, the Plan aims to incorporate existing waste ordinances, diverting as much waste as possible from landfills though reuse and recycling. All vegetative debris should be composted; metals should be recycled; other wastes should be separated and reused or recycled wherever possible. Disaster recycling programs seeks to follow the City's recycling program already in place, so as not to require new permits or other legal permission to be developed. The City should develop clear guidelines to direct businesses and residents as they deal with their own debris and trash removal after the disaster.

## Communications

**POLICY 4.3.6.**
**Utilize advance technology to enhance communication capabilities in preparation for all phases of a disaster, particularly in the high-contact period immediately following a disaster.**

Reducing the impacts of natural and technological hazards requires extraordinary cooperation and coordination among City agencies, and between departments and other governments and non-government agencies. During the immediate response period, the City will need to determine the extent and location of damage, marshal resources for response, provide information to the public, and provide critically needed services to the affected populations. The Division of Emergency Communications of the Department of Emergency Management maintains responsibility for coordinating communication among emergency responders, private partners, and people in San Francisco to ensure an effective and successful emergency operations system.

The City currently uses technologies such as geographic information systems and global positioning to allow wide access to everyday information, and is extending these networks to enhance disaster communication. The City has developed an emergency text-message alerting system, AlertSF, which delivers disaster notifications to registered users, and allows users to access neighborhood specific information. It has reestablished the World War II-era sirens to provide alerts, and it is further upgrading the system to broadcast voice instructions for responding to an emergency. There is the 311 City phone service, where callers will get assistance from an agent 24 hours a day, 7 days a week, and will provide real-time instructions during an actual emergency.

Continuing advances in technology and information systems will enable information to be more widely, quickly, and reliably. Under the direction of CalOES, the City should keep abreast of these advances and utilize them to bolster the existing local information network. The Department of Technology and Office of Economic and Workforce Development should explore opportunities to use technology to

keep all people informed during an emergency, using the full potential of rapid, online, and offline communications mediums. The City should ensure redundant networks exist to communicate at all levels, to internal staff and emergency response personnel, to convey public information, to ensure communication with special needs populations such as the hearing impaired or non-English speakers.

The City should explore work to improve inter-departmental communications during a disaster. The City's police, fire and most other agencies are on the same radio system, but other agencies such as the City's Municipal Railway and the California Highway Patrol use separate systems. The City should work internally to coordinate the radio frequencies used for its various agencies to aid smoother communications during a disaster. The public safety agencies throughout the Bay Area use a varied network of radio frequencies and equipment, making direct intercommunication difficult. The City should also coordinate with other municipalities to coordinate frequencies across the Bay Area, perhaps using a model similar to that used by the San Diego area, where a regional radio communications network links all of the areas public safety agencies.

### POLICY 4.3.7.
### Enhance communications with other jurisdictions.

Local Emergency Planning Committees (LEPCs) are regional entities set up to enhance coordination among adjacent municipalities. LEPCs are comprised of representatives from local government, the fire service, law enforcement, the local community, and industry; and they are intended to facilitate the coordination and flow of mutual aid. CalOES Coastal Regional Branch-Mutual Aid Region 2 is the LEPC for the San Francisco Bay Area and nearby counties.

The City is acting as the lead agency to develop a Regional Emergency Coordination Plan (RECP) to help the Coastal Region CalOES address gaps in regional emergency plans. The plan will detail how the communities which make up the LEPC will work together on evacuation, housing and transportation of displaced people. It also will outline how medical professionals will interact and how to cope with threats to the water supply, among other issues. Once complete, the City should utilize this plan as a basis for emergency operations issues that transcend City boundaries, such as emergency transportation, evacuation, and the movement of emergency workers.

## Public Safety

### POLICY 4.3.8.
### Plan to address safety and violence issues that may arise post-disaster, and balance these issues with the other demands that will be placed on public safety personnel as emergency response providers.

Violence in the community, including looting and rioting, can occur in the aftermath of disaster. Desperate situations, such as being without food or being stranded with no expectation of rescue, can lead to despair and risky personal actions. Experts state that perceptions of widespread community violence are often based on misinformation, citing human tendency to misread crowds as more malevolent than they really are.

The Centers for Disease Control recommends that efforts to prevent violence after a natural disaster should focus on supporting the physical and emotional needs of individuals and families as well as restoring community-based services. De-escalation training should be provided to all City employees and volunteer emergency responders. San Francisco recently started a program called, Street Crisis Team, that sends Fire and Health teams to respond to behavioral issues, instead of police. Similar programs should be pursued to prioritize the deployment of police officers for interventions where they are most needed.

During a disaster, police will be needed for public safety including activities such as search-and-rescue activities, directing traffic, or dealing with other emergency duties. Police response must be coordinated so that it can respond to both social and physical needs in the face of disaster. Law enforcement agencies, including the San Francisco Police Department and the Sheriff's Department, District Attorney's Office, agency forces such as San Francisco Municipal Railway Police Department, and institutional agencies such as the San Francisco Community College District Police Department, should work to ensure better organization among agencies, so that their magnitude can be leveraged towards the many services that will be required. The City should also maintain relationships with state and federal level peacekeepers that may be needed in an emergency, such as the Coast Guard and National Guard. Finally, security forces should establish communication with Disaster Service Workers to mobilize civilians if necessary to support their efforts.

## Partnerships

### POLICY 4.3.9.
### Develop and maintain mutual aid agreements with local, regional, and state governments as well as other relevant agencies.

Many state and local governments and private nonprofit organizations enter into mutual aid agreements to provide emergency assistance to each other in the event of disasters or other crises. The California Master Mutual Aid Agreement has been adopted by the City, as well as most cities and counties in the state. This agreement creates a formal structure for giving and receiving assistance in emergency situations. The City should expand its network of mutual aid beyond local governments to include relevant agencies such as transit providers, utilities, volunteer agencies and professional organizations for groups like health workers and emergency managers. Numerous agencies and businesses may have resources—facilities, trained staff, transportation or equipment—that can be valuable in emergencies. The City should pursue Memorandums of Understanding or other contracts with any local agencies or businesses that can be identified as resources, including the Unified School District. Discipline-specific mutual aid agreements, such as those for public works, engineering, or public information, may also be useful.

### POLICY 4.3.10.
### Continue coordination with water transit agencies, ferries, and private boat operators to facilitate water transportation as emergency transport.

Water transit can provide vital transportation support in response to a natural or human-made disaster. Following the 1989 Loma Prieta Earthquake, ferries were heralded for providing much-needed commute service and moving goods. Commercial boats can supplement the role of ferries in evacuating people and provide transit to emergency personnel and equipment in reaching disaster sites.

Vessels must be quickly deployed where most needed, and the response needs to be coordinated with land transit providers to get evacuees to/from the shoreline. The Trans Response Plan (TRP) includes a Regional Maritime Contingency Plan, which aims to establish this coordination through its guidelines and procedures for utilizing the Bay's waters in the recovery phase of a major disaster.

The Water Emergency Transit Authority (WETA) manages the Emergency Water Transportation System Management Plan which lays out emergency response and communication procedures in the case of an emergency. WETA also has plans to add seven new routes through its Ferry Implementation and Operations Plan, and will add a number of new boats and terminals. The increase in capacity gained by these new improvements would allow the Bay Area's ferries to carry over 20,000 trips per hour during a response to disaster, which is almost the evacuation capacity provided during the Loma Prieta earthquake by ferries. The City should support these plans and should ensure coordination is in place. While existing public transportation ferry services within the Bay Area are being transitioned to WETA management and ownership, the City should coordinate with private operators not yet transitioned to WETA, with the aim of establishing emergency aid agreements for the boats as well as the operators in the case of need.

### POLICY 4.3.11.
### Ensure the City's plan for medical response is coordinated with its privately-owned hospitals.

The Department of Public Health is the City's lead health response agency in the event of a hazard that leads to a major health emergency. They should continue efforts to coordinate with Bay Area private hospitals, community-based clinics, and community-based organizations in the Bay Area.

### POLICY 4.3.12.
### Develop agreements with private facilities to ensure immediate supply needs can be met.

Supplies that may be critical and in short supply after a disaster include food, water, medical supplies. Hospitals and service providers may also have difficulty in obtaining replacement equipment and medication. The City should coordinate agreements with private facilities such as hospitals, private schools, and warehouses to ensure that reasonable quantities of these necessities can be made available to the City and its people in case of a disaster. The City should also maintain its up-to-date list of rental agreements, for use of temporary supplies and facilities should they be necessary.

### POLICY 4.3.13.
### Develop partnerships with private businesses, public service organizations and local nonprofits to meet disaster-time needs.

The City should seek opportunities to partner with private sector businesses and organizations where possible. For example, drug stores can be used to distribute medical supplies and pharmaceuticals during emergencies. Medical institutions and university health centers can be set up to provide medical treatment such as inoculations in the event of a chemical or biological emergency.

Private and community-based organizations can assist with recovery activities, and in the dissemination of disaster information. The American Red Cross, Habitat for Humanity, Salvation Army, as well as numerous local groups, can be supportive partners in providing emergency shelter, food, clothing, and physical and mental health support. The City's relationships with these agencies and organizations should be mutually supportive. Local services, particularly in lower-income areas, such as food banks, senior centers, childcare centers, may be ill-prepared to cope with disaster. The City should assist in developing support networks for these organizations, providing them with employee response training, assisting them in securing insurance coverage and helping to develop contingency plans for their continued operations post-disaster.

**OBJECTIVE 4.4.**

### *GOVERNANCE AND COLLABORATION.* INCREASE THE CITY'S COLLECTIVE CAPACITY TO IMPROVE SAFETY AND RESILIENCE OUTCOMES THROUGH EFFECTIVE COLLABORATION AMONG PEER AGENCIES, THE PRIVATE SECTOR, AND THE PUBLIC SECTOR.

**POLICY 4.4.1.**

**Develop centralized strategies for City safety and resilience functions that hold individual agencies accountable for their roles in disaster planning, coordination, decision-making, funding, cost-sharing, implementation, and risk allocation.**

The City must be prepared to deliver life safety and functional recovery services at all times. Beyond basic life-safety functions, critical government programs need to continue in the aftermath of disaster. While it is incumbent on each City agency to do their own planning, centralizing plans across departments is needed to ensure that efforts by individual departments complement each other and provide a continuous service to the public. These centralized strategies need to systematically ensure advanced planning results in the proper preparation activities, disaster response activities, and adjustments necessary for life safety and functional recovery. These strategies must also include securing dedicated funding essential to a sustained effort with program longevity and consistent engagement and outreach to connect with the private and public sectors.

**POLICY 4.4.2.**

**Align safety and resilience work by regional, state, federal, and tribal government bodies to expand the reach and strength of local government support in the face of all hazards.**

Actions that the City take should be consistent with regional, state, and federal plans and projections. the City should take steps to assist these larger governmental agencies in meeting local needs. The City can pursue cooperative actions with other jurisdictions such as recommending localized and evidence-based strategies, exploring policy advocacy and funding opportunities for alignment, and developing mutual aid agreements.

**POLICY 4.4.3.**

**Form effective and clear partnerships with non-government bodies, such as community organizations, institutions, private companies, and development partners to reach all people, especially Environmental Justice Communities and other vulnerable people.**

When a disaster strikes, the "all hands on deck" response requires advance collaboration and partnerships across agencies, sectors, and jurisdictions. The overall response provided by government agencies, the private sector, and the public sector must be evidence-based, timely and proportional, multi-objective, and well measured and quantified. The long-term capacity-building partnerships with major institutions, like hospitals and universities, private development partners, and community-based organizations, will support response, recovery, and reconstruction activities meeting the highest resilience strategies.

The response, recovery, and reconstruction strategies must be based on strong, local evidence in order to reach all people at the neighborhood-by-neighborhood or block-by-block level. The strategies must be acutely aware that the climate crisis is an emergency that is already impacting communities and the environment, and so there is urgent and transformative actions needed. The strategies must be developed around racial and social equity and long-term sustainability, and they must be tracked as close to real-time as possible, so that adjustments and recalibration can be made in an informed way.

## Goal 5. Response

Provide San Francisco residents, workers, and visitors with the essential support and services needed immediately following a disaster for life safety and functional recovery. The first days after a disaster make up the response phase. Immediate response will focus on saving life and property damaged by the disaster and restoring functional recovery. The City has a network of emergency response strategies in place. The response activities will provide aid for the community, stabilization of day-to-day conditions, and support reestablishment of the critical economic welfare, social networks, and emotional well-being of the City.

**OBJECTIVE 5.1.**

### *LIFELINES.* PROVIDE CRITICAL INFORMATION AND SERVICES TO PREVENT FURTHER LOSS OF LIFE AND ESTABLISH COMMUNITY SAFETY DURING THE IMMEDIATE AFTERMATH OF DISASTERS.

### POLICY 5.1.1.
### Ensure the City's lifeline systems are constantly maintained to be in a state of good repair.

In 2010, the Federal Transit Administration (FTA) launched an initiative to maintain the nation's bus and rail systems. With state of good repair, there are well maintained and reliable bus and rail systems that provide safe, dependable, and accessible services at a full level of performance. These initiatives include having an inventory of all assets; reporting their performance and performance restrictions; and managing assets for preservation, maintenance, and operation.

As example, the transportation system is infrastructure essential to disaster response, such as serving as evacuation routes to move people out of harm's way and limit further loss of life. It is important that the transportation system is maintained to be in a state of good repair, meaning it remains in function or can soon return to function immediately after a catastrophic event. The City should coordinate with relevant government agencies, such as Caltrans and Federal Transit Administration, to preserve and expand transportation investments and financing for a well-maintained and reliable transportation infrastructure.

In San Francisco, the City can extend state of good repair principles to all lifeline systems. Lifelines are systems and facilities that provide services vital to the function of society and are important to the emergency response, recovery, and reconstruction after disaster. These systems and facilities include communication (phone, radio, television, internet), power (electric, fuel, gas), transportation (airports, highways, ports, rail, transit), water and wastewater, and more.

To extend to other lifeline systems, the City should pursue an inventory, reporting system, and asset management plan to ensure the City's lifeline systems and facilities are constantly maintained to be in a state of good repair.

### POLICY 5.1.2.
### Ensure plans are in place to support people most at risk during breaks in lifeline service.

As events have repeatedly shown, from the Loma Prieta earthquake in 1989 to SARS-CoV-2 in 2019, the most vulnerable populations become even more vulnerable when the City is disrupted by disasters. Gaps in transit service can drastically impact immobile populations such as the elderly, low-income, and medically fragile, especially in terms of their access to medical care. Loss of electrical power can also be a problem for homebound and medically-dependent individuals. Programs to notify officials, especially power providers, of these individual locations should be developed so that patients who may be unable to help themselves during a power outage or any other emergency can get the necessary support, including continuing medical care for chronic conditions and delivery of prescription refills.

### POLICY 5.1.3.
### Mitigate threats posed by digital hazards, such as terrorism and communication failures, to City systems and infrastructure.

While the City does maintain some risk of terrorism, it is more likely at risk of deliberate acts intended to impact its service and communication networks. Often the objective of such acts is not destruction or death, but disturbance—a visible impact to the City's public services, economies, and social networks. Critical facilities include the City's communication systems, such as its fiber-optic data network and network data, its physical infrastructure, such as its water and power systems. It is important to upgrade public facilities to enhance security, through physical security measures, cyber protection measures, and tight security procedures and policies as technology and practices improve. Redundant networks will help ensure that incidental failures do not have grave impacts.

The communications asset class transmits voice and data communications by cable, telephone, or broadcasting. San Francisco Department of Technology manages a wide array of communications systems, including radio, TV, internet, City internal data network, public warning sirens, emergency call boxes, communication path for traffic signals, and the Mayor's Emergency Telephone Systems (METS). In addition, private communication operators own TV and radio antennas, cell sites, hubs, fiber networks, and switches for TV, radio, internet, cell phone, and voice communications.

The key City-owned systems include the municipal fiber optics network, data centers, and an 800 Mhz radio system.

- **Fiber optics network:** This fiber network provides internet access, email, and VoIP communications. There are hundreds of miles of fiber optic cable connecting every municipal building in San Francisco.
- **Data centers:** The primary data center located in San Francisco stores, manages, and disseminates the data for most of the City's communications systems. A back up data center has been established in Rancho Cordova, CA. There are two separate network paths to Rancho Cordova for redundancy.
- **800 Mhz radio system:** The City is transitioning to a new 800 MHz radio system for emergency communications. The system relies on 11 antennas placed on buildings or high locations throughout the city, with two antennas located outside of San Francisco in Daly City and San Bruno. Most antennas are located on shared radio tower sites on buildings or high ground. The towers are not owned by the City. They are built to the highest seismic standards, but the performance of the buildings on which they are

placed is generally not known. Loss of one or more antennas in the network will degrade communications, but the system is designed so it can remain operational despite loss of several antennas. The antennas are connected to each other by fiber cables and microwave paths. The radio towers have back up power.

The private communications systems are owned by a wide range of operations, including Verizon, AT&T, T-Mobile, and Comcast, as well as private fiber optics networks and data centers that these operators rely on.

### POLICY 5.1.4.
### Increase communication capabilities in preparation for all phases of a disaster, and ensure communication abilities extend to hard-to-reach communities.

Communication will be necessary and critical to the City in the response phase immediately following a disaster and in the recovery and reconstruction period. The City should have redundant networks in place to communicate at all levels, to coordinate internal staff and emergency response personnel, and to convey public information. The public communication should be equitably disseminated to ensure outreach to special needs populations, such as the hearing impaired or non-English speakers. The communication methods should be culturally competent, address the digital divide, and be independent from reliable cell service, such as outdoor public warning systems.

In addition, existing neighborhood organizations can develop local models that serve the same purpose. Development of a neighborhood communications plan can allow community members to keep in touch with, and keep track of, their neighbors, particularly the elderly or disabled that may be most in need of support during a time of emergency. Elements of this plan could include phone trees, text message trains, and the establishment of physical block captains to perform door-to-door checks if necessary.

The Department of Public Health's Community Response Plan calls for community members and organizations to have the means necessary to be inform policy makers about the damage and critical needs of each neighborhood throughout the City. By having a method for communicating at the neighborhood level, community members will be able to notify officials and seek out help in areas of the City that might be difficult to reach after a disaster.

### POLICY 5.1.5.
### Develop a system to convey information during and immediately after a disaster.

In addition to conveying general public information about the disaster to people and the outside world, the City will also need to respond to more personal inquiries by impacted people. This can include questions about what services and aid is available, as well as inquiries about the location, health, and welfare of relatives or other community members.

The City should plan for an information system composed of a series of local Public Information Centers intended to convey more personalized information to the public. These centers should be located in accessible community locations, such as libraries, but should also be sited away from the centers of emergency activity, such as lifeline facilities. They can be outdoor public warning systems, centralized online systems, and decentralized offline systems. These centers should be connected to receive up-to-date information from law enforcement agencies, other City agencies, the school district, public shelters, local hospitals, and the coroner, and they should also be linked to regional centers in other parts of the Bay Area. During a disaster, these regional information centers should be directly linked to consumers via the 311 City phone service.

### POLICY 5.1.6.
### Follow the National Incident Management System (NIMS) procedures in declared emergency scenarios.

A major disaster will entail assistance from beyond the City's borders, potentially involving assistance of other Bay Area jurisdictions, the state of California, and even the federal government. To coordinate this assistance, the federal government has developed a national approach to incident management, called the National Incident Management System (NIMS), to act as the common language and procedural guide bridging different entities. NIMS was developed so responders from different jurisdictions and disciplines could talk to each other in a common language and work together better to respond to natural disasters and emergencies, including acts of terrorism. NIMS uses a systems approach to integrate the best of existing processes and methods into a unified national framework for incident management. Its concepts and practices cover incident management; standard command and management structures; and emphasis on preparedness, mutual aid, and resource management.

The City's various agencies, particularly those who are its first responders, are already familiar with the NIMS system and utilize its framework in the development of emergency response and other plans. The City should continue this practice, and ensure it is kept up-to-date with current NIMS practices. New approaches that will improve effectiveness are likely to result in refinement of the NIMS over time, so the City should maintain an awareness of any changes and incorporate them into its response planning and practices.

### POLICY 5.1.7.
### After an emergency, follow the mandates of the Emergency Response Plan and Citywide Earthquake Response Plan.

The Emergency Response Plan directs the City's actions after a disaster, assigning responsibility to agencies and departments. Many of the immediate actions needed to begin the recovery process are described in the Emergency Response Plan, such as debris removal, emergency building assessment and repairs, and meeting the immediate needs of federal and state agencies for information.

The Citywide Earthquake Response Plan supports this plan by providing response actions for the incident of an earthquake. Both plans should be used to guide all responsibilities and activities in the case of a disaster.

## OBJECTIVE 5.2.

### *COMMUNITY PARTNERSHIPS.* WORK WITH NEIGHBORHOOD-BASED ORGANIZATIONS AND TRUSTED PARTNERS TO EXPAND DISASTER RESPONSE ACTIVITIES ACROSS THE CITY.

**POLICY 5.2.1.**
**Work collaboratively with nonprofit and community partners to assist Environmental Justice Communities and other vulnerable people during and immediately after a disaster to ensure resumption of social services.**

In addition to disrupted infrastructure, such as transit and transportation, power, water, gas and sewer, phone service, the City will also face disruptions to its social services at a time when they may be most needed. The City's most vulnerable populations will be at risk of service disruption and delayed resumption, including seniors, people with disabilities and other functional needs, institutionalized or incarcerated people, youth who have been separated from their families due to the disaster, and residents of single-room occupancy hotels and public housing. Hospitals and clinics may be damaged or overcrowded, schools and daycare centers will be closed, and families may be separated. Centers for special needs populations may be temporarily shut down, due to damage or unavailability of employees. Local services, particularly those meeting the needs of low-income residents, may be ill-prepared to cope.

The City should have continuity policies and plans in place for its services. One way of supporting their immediate resumption would be to establish a policy clarifying that for specified City employees, their primary role as Disaster Service Workers is to carry out their everyday positions in social service provision. In advance of a disaster, processes should be established to ensure the continuity of payments to social service organizations under contract with the City.

The City is not, however, the only service provider that needs to plan for disasters. The City should assist local service providers so that they can resume services immediately following a disaster, including mental health centers, substance abuse services, homeless shelters, community health centers, and senior services. But in past disasters, lack of coordinated planning—between the City and among agencies—has resulted in gaps in aid or in redundant services.

Community-based organizations and neighborhood-level emergency planning efforts should plan for disasters and be in coordination and partnership with the City. Nonprofit groups are key players in disaster response, providing food and shelter in the short-term and assisting in longer-term recovery through services such as health care and job placement. In advance of disasters, the City can support community-based organizations by providing them with employee response training, insurance coverage, encouraging development of contingency plans, and offering opportunities for financial resources.

**POLICY 5.2.2.**
**Identify and retain vendors and contractors to be readily available to respond immediately after a disaster.**

When a disaster strikes, there will be a strain on needed goods and services, such as shelter, food, and waste removal. One way to address the urgency of post-disaster needs is to make arrangements with local and regional contractors before disaster strikes. Pre-qualifying of contractors who can respond in emergency scenarios and who have equipment to handle the work is another solution for immediate response.

The Office of Contract Administration maintains an emergency list of supply vendors. The Office should work with other departments to understand the types of supplies that may be necessary in the case of a disaster and have contracting options readily available, including an up-to-date list of qualified contractors. The list should contain sufficient sources for the kinds of goods that will be most in demand after a disaster—tents, food, etc. As-needed contracts should be readily implementable to meet emergency need, and existing contracts and franchise agreements should be reviewed for their applicability in the case of a disaster.

Public Works maintains a registry of construction-related contractors. This list can be a valuable resource after a disaster. The agency should ensure it is kept up-to-date, and that old or unavailable contractors are removed on an annual basis. The City should also explore methods that will enable small and local firms, including minority- and women-owned businesses, to take a more active role in the response and rebuilding process, it may be beneficial to develop a program to train and qualify local contractors for government-backed projects.

**POLICY 5.2.3.**
**Develop and implement plans to accept, train, organize, and utilize volunteers in the delivery of basic emergency management tasks.**

Post-disaster, it is likely that the City will see an outpouring of people willing and wanting to help with recovery efforts. The mobilization and reinforcement of these resources will require significant management by City responders. If no system is in place to harness the potential provided by these spontaneous, or "convergent," volunteers, this resource will be lost. Volunteers are convergent when they are unexpected, typically community members who wish to render aide following a large-scale emergency.

During the City's COVID-19 efforts, the Department of Human Resources (DHR) established an Emergency Volunteer Center (EVC) where it credentialed over 1,000 volunteers in the State's Disaster Service Worker Volunteer Program. DHR deployed over 600 of those volunteers to perform volunteer services with the Department of Public Health. The City should ensure that the lessons learned from its COVID-19 volunteer management and response efforts are incorporated into a revised plan for organizing and mobilizing convergent volunteers. This revised plan should encourage working in concert with the City's ongoing disaster service volunteer programs, such as the Neighborhood Emergency Response Team (NERT).

### POLICY 5.2.4.
### Develop strategies for cooperating with the media.

Having a media communication strategy is an important component of responding to a disaster. Beyond communicating locally and to the region, the media is the means by which the outside world understands what has happened. Media coverage leads to national, and potentially global understanding, of a disaster and its impacts. Media coverage can be a primary factor in attracting public and private aid. It can fuel demands for action and stimulate public support for actions to prevent or mitigate future disasters.

The Mayor's Office of Communication will direct all high-level strategic messaging regarding the City's overall emergency response. The Joint Information Center (JIC) will integrate Mayor's Office of Communication strategic messaging into the myriad of communications produced within the JIC, including media responses, public information alerts and notifications, and proactive social and traditional media content. The Mayor's Office's crisis communications plan should include strategies for openly and honestly dealing with the media. Procedures for disaster media relations should also ensure that the designated spokesperson—and in the case of a disaster, this may not be the usual media spokesperson—understands the depth of the disaster and the details of its impacts. Media kits should be prepared and ready for distribution as soon as possible.

There are frequently concerns about the negative impact of media coverage on a community post-disaster. Because of the nature of media, stories can often be overtaken by a focus on deaths and damage to property. Political leaders may be concerned about the negative publicity's impact on tourism and external investment, or fear that it could incite mass departure of business and residents. Even in the face of these fears, it is important that the City take a positive view of media operations and cooperate with the media based on a policy of openness.

Rather than restricting information, the City should work to present media organizations with a balance of information about the kinds of public actions and safety measures that have succeeded, as well as those that have failed, so that coverage can go beyond simply accounting for totals of loss. A news story focusing on the amount of earthquake damage inflicted could just as easily include information about the number and types of structures that survived because of hazard mitigation measures, and provide information about shelter locations, response and recovery efforts and priorities, and more.

## OBJECTIVE 5.3.

## *HAZARD-SPECIFIC RESPONSE.* ADDRESS ANY SPECIFIC, SHARED, OR COMPOUNDING NEEDS FOR COMMUNITY SAFETY IN THE AFTERMATH OF A DISASTER.

### POLICY 5.3.1.
### Establish a plan to facilitate the continuity of permitting services in the case of a disaster for building repairs and other essential permitting services.

Rebuilding the City post-disaster can be facilitated by increasing the points of access where permitting can occur. With certain hazards, it can be challenging and infeasible to maintain permitting continuity through the San Francisco Permit Center's in-person services. The City can offer a fully digital permitting platform and satellite, in-person permitting centers to offer one-stop City permitting services such as Building, Public Works, and Health permits. Through these accessible modes, permitting can increase building owners' access to services for their recovery planning and can reduce the possibility of overload at the central permitting facilities at the Planning Department and the Department of Building Inspection.

The City should develop a fully digital permitting process to be nimble in its continuity of permitting services and remote staffing capabilities in the event of a disaster. The digital platform can support the permitting roles and responsibilities across City agencies, such as the Planning Department, Department of Building Inspection, Public Works, and the Department of Public Health. These satellite centers can be operated on a temporary basis, perhaps until a targeted number of buildings are brought back online. Depending on the hazard and level of damage, the network of satellite centers may depend on building and outdoor safety, ability to congregate, or staffing availability.

**POLICY 5.3.2.**

**Ensure historic resources are protected in the aftermath of a disaster and support post-disaster restoration of damaged historic buildings.**

Preservation of the City's historic resources is an immediate concern when damage is being assessed. The older construction techniques of historic buildings make them more vulnerable to damage, and if the damage is noted without recognition of the resource's historic value, the building can be at risk of further damage or demolition. Having complete and accurate information to document historic resources is fundamental to ensuring they are not lost. This information can be mapped and used by assessors in the tagging of buildings post-disaster.

The Planning Department has been actively engaged in survey work through the Citywide Survey Program. The focus of the program is on neighborhoods that are undergoing long-range planning efforts or are the focus of intense development activity. The Citywide Survey Program will continue survey efforts in neighborhoods outside of Area Plan study areas as resources become available. While that Citywide Survey is underway, the City should make use of existing survey information, including privately developed property reviews, and ensure it is made available to the Department of Building Inspection and any other relevant contractors who may be charged with doing evaluations of damaged buildings.

Post-disaster assessment should include an analysis of the extent of damage to historic areas and resources. In a typical assessment scenario, assessors will attach a green tag if a building is structurally sound, a yellow tag where repairs are needed, and a red tag if the structure is uninhabitable. This system should ensure sufficient protection for historic resources post-disaster, in that all tagged buildings receive more detailed evaluation that considers survey information before any steps towards demolition are taken. The system could also include separate placards identifying the building as a historic resource. Without such identification, the buildings are at risk.

**POLICY 5.3.3.**

**Address hazardous material and other spills by requiring appropriate clean up by property owners, per local, state, and federal environmental laws.**

Spills, leakages, and releases of hazardous waste and substances can cause severe damage not only to the environment, but to public health. This is a particular issue for older industrial properties with historic contamination issues, as they convert to other uses or forms of development. In cases where environmental damage or hazardous spills have occurred, the City shall require all property owners and other responsible parties to report and to perform clean up to the level required by local, state, and federal environmental laws. Where such parties delay in this required clean up, the City, working with other regulatory agencies, shall take all measures necessary to ensure public health and safety is protected.

# Goal 6. Recovery and Reconstruction

Rebuild San Francisco's built, natural, and social assets and communities towards a more equitable and resilient future. Short-term recovery actions—ensuring reconnection of utilities and services, temporary housing—are often an outgrowth of the response phase. Long-term recovery begins once many of those short-term actions are underway or have been completed—as the rubble and debris have been cleared, major services are restored, and daily operations are reinitiated. The actual reconstruction phase typically takes 5 to 10 years, but it can be much longer. Even across the City, full recovery—return to or improvement beyond the pre-disaster state—can vary considerably from neighborhood to neighborhood. Some areas might be best repaired and rebuilt similar to their pre-disaster conditions, while other areas with pervasive damage may need new area plans applying citywide objectives. Advance planning will improve the City's ability to make decisions quickly and equitably. Longer-term recovery and reconstruction decisions will need to be made by decision makers—including the Mayor, the Board of Supervisors, the Planning Commission, and others—with considerable public involvement by the people most impacted by hazards and their consequences.

**OBJECTIVE 6.1.**

***BUILDINGS AND INFRASTRUCTURE.*** **MAXIMIZE THE OPPORTUNITIES TO RESTORE AND REBUILD THE BUILT ENVIRONMENT WITH RESILIENCE TO ALL HAZARDS.**

# Housing Security and Justice

**POLICY 6.1.1.**

**Support actions to mitigate the spread of homelessness pre-disaster and increase the likelihood that the City's stock of lowest-cost housing will survive post-disaster.**

Individuals and families experiencing homelessness have high exposure to risks and are especially vulnerable to hazards. They lack adequate shelter and protection from harm. Post-disaster, especially for catastrophes with potential to destroy housing, the City's existing shortage of affordable housing will be exacerbated. A significant portion of the City's affordable housing stock are provided by some of the neighborhoods most vulnerable to serious damage in an earthquake. Much of the City's lower-cost housing is provided through older buildings, which are more likely to sustain damage in the case of an earthquake. Many of these older units are kept affordable through rent control. Through state-mandated vacancy decontrol, the rent of rent-controlled units may be increased when the unit is vacated, and the unit does not have to be restored if the unit is replaced. Without action, sea level rise and flood hazards may increase risk in lower-cost housing in Environmental Justice Communities. These conditions are likely to exacerbate homelessness and displacement post-disaster.

Damaged affordable housing units and single-room occupancy hotels should be repaired as expediently possible, and if necessary, replaced on a one-to-one basis. Cooperation among the private market, nonprofit agencies, and local, state or federal government sources should pursue achieving a similar level of affordability as units are replaced or made resilient to future hazards. Eviction regulations in the post-disaster period should ensure the disaster is not misused to remove tenants with lower rents.

Pursue policy advocacy at the state and federal levels to enable eviction moratoria and rental relief during disasters, such as the eviction moratoria during the COVID-19 pandemic. This relief should be available to vulnerable people, property owners, and businesses who are displaced by disasters and to facilitate their right to return. In the wake of a disaster, it may be difficult for residents, especially renters, to demonstrate proof of residency and liaise with landlords and property owners. The policy advocacy should identify inclusive eligibility criteria, robust funding sources, and have limited barriers to accessing the relief.

**POLICY 6.1.2.**

**Provide adequate interim accommodation for residents and businesses displaced by a major disaster in ways that maintain neighborhood ties and cultural continuity.**

While the City's first priority should be to encourage and enable the retrofit of residential buildings, to minimize damage and allow residents to shelter-in-place following a disaster, the Department of Emergency Management estimates that after a major earthquake, between 20,000 to 90,000 housing units may be destroyed or substantially damaged. Many businesses that provide necessary services to residents will also be displaced. The Care and Shelter Plan establishes a framework for the provision of emergency shelter for the general population. The Care and Shelter Plan should be expanded to accommodate people experiencing homelessness at the time of disaster. Currently, no specific agency is tasked with the responsibility of interim housing, nor with finding temporary space for displaced businesses. Future implementation plans should address these issues.

The City should designate a lead agency to plan for interim housing and business needs. This agency should work in collaboration with state and federal agencies to consider City goals and advocate for the affected communities. To maintain relationships and connections within the community, interim housing and other facilities should prioritize keeping residents in their neighborhoods and near their pre-disaster homes as much as possible.

**POLICY 6.1.3.**

**Repair damaged neighborhoods in a manner that facilitates resident return and minimizes long-term displacement, prioritizing Environmental Justice Communities and other communities disproportionately impacted by housing disparities.**

San Francisco neighborhoods have distinct characteristics, and often have long-term residents, businesses, and institutions. Many neighborhoods have distinct cultural identities and provide the bonds of community for their residents. The City, in cooperation with state and federal agencies and community-based organizations, must manage rebuilding to minimize long-term displacement, retain neighborhood cohesion, and expand housing opportunities for communities disproportionately impacted by housing disparities.

As such, plans should provide opportunities for those who lived in the area to return to new or repaired homes and other facilities there. The City should explore methods of providing return rights to tenants that must vacate their unit because of reconstruction, renovation, or improvement. These methods may include the "right-to-return," down payment assistance, lottery preference, and other financial assistance that would relate to accessing private market, below-market-rate housing, and public housing.

**POLICY 6.1.4.**

**Protect individuals and families experiencing homelessness in the wake of disaster.**

Homelessness, and the risk of becoming homeless, will be exacerbated by hazards. The 1989 Loma Prieta earthquake damaged homeless shelters and numerous single-room-occupancy hotels that were an important source of housing for the very poor.

In preparation for disasters, the City should inventory its stock of homeless shelters, single-room-occupancy hotels, and transitional living facilities. The City must ensure its post-disaster plans consider major social issues like homelessness. With many properties destroyed or uninhabitable, it will be even more difficult for this challenged population to find suitable housing after an earthquake. Transition to long-term shelter will be needed for those already homeless, requiring long-term aid and greater assistance than is typically required by disaster victims. When a disaster strikes, it can be traumatizing to a community already disproportionately impacted by mental health. The City should pair long-term shelter and aid with comprehensive, evidence-based systems that offer a continuum of care, such as mental health and substance abuse care, social work, and other supportive systems.

### POLICY 6.1.5.
### Ensure sufficient affordable housing and workforce housing during reconstruction.

Lack of housing can have a severe impact on economic recovery. If the labor pool has nowhere to live, they are unable to work. Limited housing opportunities, particularly for low-income communities and low-wage workers, can curtail the available labor pool for construction activities during rebuilding, and the absence of permanent housing once businesses have come back online may cause local employees to seek work elsewhere.

The City should partner with the business community in restoring workforce housing for the community after a disaster. The most useful assistance local businesses can provide may be financial contributions, whether they are at-large contributions coordinated by the City or direct subsidies offered to their own workers. Some possible methods include the development of employer-directed community land trusts or rental deposit and down payment grants for displaced workers.

## Reinforce Hazard Mitigation

### POLICY 6.1.6.
### Encourage continued and adaptive reuse of San Francisco's existing building stock, including those with architectural and historical merit, to reduce greenhouse gas emissions that may otherwise occur from new construction.

Post-disaster, the City should prioritize the repair and rehabilitation of existing buildings. As feasible, existing buildings should follow life safety and functional recovery standards, and then, be recovered as close as possible to pre-disaster conditions and use. This repair and rehabilitation of existing buildings, as compared to new development, will mitigate greenhouse gas emissions, especially when reinforcing climate mitigation principles.

In addition to those with architectural and historical merit, existing bodies contain embodied energy, and thus, their preservation can be a sustainable practice when compared to new construction. The practice of reuse can reduce or completely eliminate greenhouse gasses that are emitted as the result of demolition, manufacturing and transport of building materials, and new construction—the greenest building is one that is already built. Furthermore, less environmental strain is caused from the reduced extraction of natural resources from materials development and reduced solid waste from demolition. Promoting the reuse, rehabilitation, and restoration of existing buildings can thus help to reduce the City's carbon footprint, serving as a valuable climate mitigation technique.

### POLICY 6.1.7.
### Apply sustainability practices in rebuilding projects, consistent with the City's Climate Action Plan and greenhouse gas emissions reduction targets.

Particularly with large-impact earthquakes, buildings and infrastructure may be compromised or destroyed. Salvaging their materials not only aids in reducing the amount of debris going to a landfill and reducing air quality emissions associated with demolition, it also contributes to the local economy and supports the rebuilding process. The City should support the establishment of new businesses that can reclaim, warehouse, and resell salvaged materials. The City should also provide incentives to promote incorporating salvaged materials in construction.

One way the City could support a market for these materials is to develop policy that requires rescue and reuse of salvaged materials in new development and rebuilding projects. The City has many green building requirements already in place that should be reconsidered and perhaps expanded in light of projected post-earthquake rebuilding needs.

### POLICY 6.1.8.
### Ensure equitable outcomes in the consideration of design character and quality in all rebuilding projects.

A disaster may damage many of the neighborhoods and buildings that contribute to the City's urban design character, and it is imperative that reconstruction be done in a way that will strengthen urban design character, as the city continues to grow and evolve. The City's attitude toward rebuilding will have to balance sometimes competing objectives—the need to rebuild quickly, the need to rebuild equitably and with robust input and participation of the affected communities, and the desire to maintain or improve design character. All reconstruction should be centered in racial and social equity and should follow the framework put in place by the post-disaster recovery and reconstruction plan, as well as the urban design standards and design guidelines already in place in the city.

It is important that large-scale rebuilding does not succumb to the political pressure of property owners to rebuild, at the sake of important interests in racial and social equity, community participation and engagement, urban design, historic and cultural preservation, and hazard mitigation and resilience opportunities. While other policies speak to the need for timeliness in reviewing reconstruction projects, the policies developed must ensure humane outcomes for vulnerable communities and that design character and quality are not ignored in the urgency of rebuilding.

## OBJECTIVE 6.2.

### *ADVANCE RECOVERY PLANNING.* COMPREHENSIVELY PLAN FOR THE RESTORATION OF CITY FUNCTION AND ECONOMIC ACTIVITY, WITH FLEXIBILITY TO KNOWN AND UNKNOWN HAZARDS.

**POLICY 6.2.1.**
**Before an emergency occurs, establish an interdepartmental working group to develop an advance recovery framework that will guide long-term recovery, manage reconstruction activities, and coordinate expedient rebuilding aligned with City policies.**

Advance recovery planning is critical role for the City's resilience. A framework for recovery and reconstruction can expedite decision-making based on already agreed-upon priorities and goals. The City's history of disaster has proved that pressures for speedy rebuilding are strong. Therefore, it is critical that the governance and planning framework for recovery and reconstruction be established before disaster occurs.

To provide direction for any planning that happens post-disaster, the Mayor and the Board of Supervisors should establish an interdepartmental working group to create a framework for recovery and reconstruction. The working group should be comprised of representatives from the following departments: the Mayor's Office, Mayor's Office of Economic and Workforce Development, Mayor's Office of Housing and Community Development, Controller's Office, Chamber of Commerce, City Attorney's Office, City Administrator's Office, Office of Resilience and Capital Planning, Office of Community Investment and Infrastructure, Office of Racial Equity, Department of Building Inspection, Department of Emergency Management, Department of the Environment, Planning Department, Public Works, Public Utilities Commission, Human Rights Commission, the Board of San Francisco Travel, the Academy of Sciences, among others.

The framework should outline the City's priorities and guidelines for the City's post-disaster recovery and reconstruction. This framework should be tested through scenario planning before being developed fully into a post-disaster recovery and reconstruction plan. While such an effort cannot anticipate the impact of every disaster, the effort can reduce the demands of rebuilding after a disaster.

**POLICY 6.2.2.**
**As a part of the advance recovery framework, develop and adopt a repair and reconstruction ordinance.**

The rebuilding and reconstruction efforts that will need to be undertaken after a disaster will need to be swift in repairing lifelines, homes, and other resources the City depends upon. After a disaster, the Departments of Building Inspection and Planning will likely see a surge in permit applications. While the Department of Building Inspection already maintains procedures to deal with emergency repairs, the City does not have plans to deal with the sustained demand that may result from large-scale reconstruction. Upon completion of the advance recovery framework, the task force should develop a recovery and repair ordinance that help implement the framework and facilitate the repair and reconstruction of buildings following disaster.

The recovery and repair ordinance should build upon existing building and planning code standards and policies to facilitate an efficient reconstruction process, help to simplify and expedite the permitting and review process, support integration of racial and social equity and resilience principles, while avoiding a hastily administered permitting process. The ordinance should establish clear permit processing and review procedures to expedite rebuilding in the post-disaster period, while providing the amount of review necessary to ensure that reconstruction meets the City's objectives and appropriate local policies, plans, and code standards, yet is economically feasible.

The ordinance should consider policies to address nonconforming uses and buildings, explore modifications to outdated codes and standards, consider the applicability of the City's notification or other review procedures, and address historic buildings to ensure that, to the greatest extent possible, repairs maintain the integrity of the structure without adversely affecting its historic nature. The ordinance should also revise post-earthquake building inspection protocols to identify buildings that have reached functional recovery that can be occupied safely despite damage and loss of utilities, allowing residents to safely shelter in place while waiting to make repairs.

The ordinance should create priority categories for building types, prioritizing critical response facilities first. The ordinance should also be clear on the length of time during which it is applicable. It is important that the ordinance not work in conflict with other City goals. Large-scale damage to confined areas might warrant specific neighborhood-level plans or reconstruction guidelines, and these will take time to prepare. If necessary, the ordinance should allow for periods of non-building while important changes are adopted into law. The ordinance should also include sufficient provisions to ensure that it is evaluated, and amendments can be made as needed, post-disaster, to appropriately address the disaster impacts.

**POLICY 6.2.3.**
**As a part of the advance recovery framework, coordinate the realignment of government post-disaster, so City employees' skills can be used effectively towards recovery and reconstruction efforts.**

New roles and responsibilities for governments will emerge after a disaster strikes. It is imperative that government be nimble enough to adjust to the various new roles after the disaster. The City should be willing to reconfigure offices, departments, and services to be best serve the public after a disaster. The Disaster Service Workers program may extend into recovery and reconstruction phases.

For instance, there might be the need for the Planning Department, Public Works, or Department of Building Inspection to work together in teams and be decentralized with satellite offices set up in neighborhoods that were particularly devastated by a disaster. By placing them in neighborhoods, their time can be better spent on the ground understanding what type of reconstruction is necessary and possible, through inspections and site visits with building owners and residents.

**POLICY 6.2.4.**
**Update the advance recovery framework on a regular basis so that it continues to be aligned with City goals and values.**

The advance recovery framework should be updated as necessary to reflect changing conditions, changes in City policy and technology, and changes in state and federal regulations that affect post-disaster recovery management, financing, and other processes. The task force should set, in its creation of the plan, a schedule for regular updates to ensure it keeps up with shifting community priorities as well as to keep it present and important in the public's mind. The community must be involved in the process to identify and develop the community priorities, along with the specific core values of recovery. The advance recovery framework can inform more targeted resilience planning processes that are place-based or site-specific, such as in Environmental Justice Communities or other areas vulnerable to disaster.

**POLICY 6.2.5.**
**Develop and maintain broad public support for the advance recovery framework to ensure its eventual implementation.**

Once an advance recovery framework is developed, its work is not over. Implementation of the framework post-disaster is its critical mission, and achieving this in the aftermath of a disaster will require vigilance on the City's part. Community demands for rapid reconstruction will likely be perceived by many to be in conflict with calls for post-disaster planning and time needed to complete such a process.

The City should develop an ongoing program to regularly train the City's leadership and build community support for the framework to ensure its implementation in a time-compressed and high-pressure post-disaster environment. While there will always be tensions to rebuild quickly post-disaster, the desire for haste should not preempt the implementation of the recovery framework or undermine a potentially necessary recovery and rebuilding process. The community outreach process for the advance recovery framework should provide a vehicle to strengthen community support.

**POLICY 6.2.6.**
**Post-disaster, build upon the advance recovery framework to create a recovery and reconstruction plan to direct the City's reconstruction activities, manage the long-term recovery period, and coordinate rebuilding activity.**

Using the pre-disaster framework as the basis for all planning, the next step is turning that framework into tangible actions to direct and manage the specific impacts of an actual disaster.

Therefore, after a disaster occurs, the City shall establish a recovery and reconstruction task force to guide the planning process and plan development built upon the City's recovery framework. The task force should be made up not only of City agencies represented in the working group, but also a range of community representatives, including business interests, nonprofits and industry leaders, policy advocates, and neighborhood representatives. The task force should also engage with and involve representatives of other counties, state, and federal agencies. The task force's efforts should be directed by a designated lead agency or individual who can facilitate the recovery and reconstruction planning process and oversee its implementation.

The task force will be responsible for the development, drafting, and adoption of the post-disaster recovery and reconstruction plan, following the established framework and guidelines. Perversely, a disaster may present the City with a unique opportunity to physically, economically, and socially strengthen the City and the region equitably; the recovery and reconstruction plan should take advantage of this opportunity.

**POLICY 6.2.7.**
**Rebuild after a major disaster consistent with established General Plan objectives and policies.**

The General Plan has been adopted, after much public consideration, to assure the preservation, enhancement, and safety of this very desirable urban environment. In efforts to restore damaged areas of the City, existing development policies and regulations should be respected. Opportunities may be created for realizing General Plan policies, such as increasing affordable housing, improving circulation

systems, and providing public or private open space. In areas with extensive building and infrastructure damage, an area plan may be the best approach to coordinate rebuilding to take advantage of opportunities for neighborhood improvement. The rebuilding process may also enable possibilities for advancing environmental justice, increasing mobility through improved and increased public transit, as well as other alternatives to the private automobile. Future Elements and Area Plans of the General Plan should be formulated with an awareness of their potential applicability in relation to disaster recovery.

### POLICY 6.2.8.
### Ensure that an equitable recovery and reconstruction plan is adopted that is comprehensive and consistent with already established City goals, policies, and programs.

The recovery and reconstruction plan will need to prepare the City to meet immediate changing needs after a disaster. Special services and facilities will be needed on a short-term basis, including temporary housing, commercial facilities, and health and human services. During the recovery period, it may be necessary to temporarily locate these facilities in areas not normally available for development, or at higher densities than is normally allowed. Extensive damage may warrant reconsideration of large-scale issues such as housing locations, transit, and public infrastructure such as streets and freeways. A detailed recovery and reconstruction plan may require planning at scales that exceed existing policies and controls.

The recovery and reconstruction plan should build upon established General Plan goals, objectives, and policies, and ensure consistency with City programs, policies, and regulations. The plan should include clear policies and programs addressing the following at a minimum:

- Coordination with federal and state agencies
- Coordination with other regional cities and counties
- Protection of Environmental Justice Communities and other vulnerable people
- Plans for interim housing (considered to be a part of long-term planning, because many of the housing solutions may become permanent)
- Plans for financing and incentivizing housing repairs and construction of potentially large numbers of replacement housing units, including consideration for affordability needs
- Plans for land use decisions and recommended changes in response to local opportunities
- Establishment of public reconstruction priorities

The recovery and reconstruction plan may also consider potential changes to the City's physical framework and development pattern, potentially reviewing issues such as:

- Structurally and geologically hazardous conditions and mitigation options
- Re-examination of street patterns, street design, and standards such as required width, etc
- Designation of areas for consideration of land acquisitions, reconfigurations, consolidations, and subdivisions
- Comprehensively addressing environmental justice issues
- Recommendations for changes and improvements to major transportation routes, transit networks, and other lifelines
- Revisions to City infrastructure networks, including possible undergrounding of utilities, and use of new technologies in service provision
- Guidance for financing and advancing the City's long-term economic recovery.

While the specific uses of public lands may vary after a large-scale disaster, public lands must be preserved for public purposes. As circumstances allow, pursue opportunities for expanding public lands for public purposes.

### POLICY 6.2.9.
### Where necessary, use the City's public authority to expedite repair, reconstruction, and rebuilding in a just and equitable manner.

In the aftermath of a disaster, there may be properties that lie fallow for some time. The damage may be so severe that owners without insurance simply abandon properties; absentee owners and landlords could choose simply to not return; and there may be cases where it is not economically feasible or possible for owners to rebuild.

The City maintains the authority to impose policies, rules, and regulations to protect the public welfare, order, and security. If public welfare is at stake—for example, in damaged rental properties that remain unrepaired and unoccupied, are a safety or health hazard, or have deteriorated to such a degree that they are unlikely to be restored to quality housing—the City may need to explore ways of restoring these units through partnerships with community-based organizations, neighborhood-based efforts, and other key stakeholders.

The City should carefully consider the lessons from history prior to exercising eminent domain. There have been historic misuses of the power of eminent domain that have significantly harmed communities. In the 1940s, eminent domain harmed the Japanese American community during internment with forcible loss of property and belongings. In the 1950s, the City exercised eminent domain once again and harmed the African American community during redevelopment of the Western Addition and the Fillmore. These pernicious events should be used as cautionary tales for future uses of this tool. The power of eminent domain can be used to expand public benefits, such as the Hualapai Nation of Arizona exercising its authority to reclaim land for tribal ownership and use. The City also used eminent domain to expand public benefits through the Central Subway, extending Muni light rail service.

In addition to health and safety, the City should prioritize housing equity in the community. The City can consider the return and retention of the American Indian community, Black community, and other communities of color post-disaster; the housing needs for individuals and families with experience of homelessness; the community needs for low-income and other vulnerable people; and the recovery and growth of the local business community.

## OBJECTIVE 6.3.

## *EQUITABLE INVESTMENT.* PURSUE PLANS AND STRATEGIES THAT WOULD EQUITABLY REBUILD SAN FRANCISCO FOR EVERYONE, STARTING WITH ENVIRONMENTAL JUSTICE COMMUNITIES.

### POLICY 6.3.1.
### Develop an economic recovery strategy to guide planning and implementation before the disaster strikes.

A disaster can have a major impact on the economic landscape of the City. Previous earthquakes have resulted in dramatic losses in office space and subsequent relocation of businesses; in drops in tourism, which is one of the City's major industries; and disproportionate impacts on small businesses, who have fewer resources with which to recover. The City should ensure an economic recovery strategy is in place to equitably foster business resumption and growth post-disaster.

In the wake of a disaster, many local businesses, particularly small businesses, will struggle to resume activity. They may have lost assets, necessary facilities or equipment, access to employees, and even their customer base. While the City's own funds will be limited from providing direct financial assistance, there are many other things it can do to support businesses. For example, in response to the COVID-19 pandemic, the social distancing and masking requirements, as well as discouragement of sharing indoor space, made it challenging for businesses such as restaurants and small retail shops from operating normally. The City's Shared Spaces Program supported small businesses by allowing them to expand their operations to outdoor places like sidewalks, streets, and open lots.

The City can encourage loan and grant funding from non-government sources, and further affected businesses' ability to secure loans from local banks or unions by offering government guarantees on loans. Tax incentives should be explored to encourage reinvestment and growth of business, including temporary payroll tax exclusion, sales tax exemption and tax write-offs on replaced business equipment and furniture, and property tax abatements.

The economic recovery strategy should prioritize the elements of the City necessary to support business activity, starting in Environmental Justice Communities, such as the restoration of transit and regional roadways; utilities and services available to the business community; and housing availability for the local workforce and customers. The City should work with the business community to develop this strategy, and solicit wide advice on how to facilitate business revitalization. The strategy should use the latest assessment tools provided by the Office of Racial Equity and center the needs of businesses that are owned by and/or serve residents in Environmental Justice Communities. The strategy may include recommendations to hasten the resumption of business such as loans, funding for workplace building repair, and financial assistance. Updates to the City's Economic Strategy, created by the Office of Economic and Workforce Development, should include plans for economic recovery in case of a disaster.

### POLICY 6.3.2.
### Support the efforts of the Controller's Office to ensure service continuation and financing of post-disaster recovery and reconstruction efforts.

The Controller's Office is the designated lead agency for the Finance and Administration Section of the Emergency Response Plan, supported by the Department of Administrative Services and the Office of the Treasurer. These groups are tasked with ensuring employee payment and compensation, and with payment of contractor and vendor accounts, in the immediate response phase of a disaster through recovery to pre-disaster service. These elements will be critical to the continuing operation of City services.

In order to ensure continuation, the Controller's Office has programs underway to ensure that payroll continues to be processed for all City workers, implementing off-site payroll processing if needed; that employee compensation is resumed; that financial and accounting computer systems can recover and resume as soon as possible; and that all payments, both to City workers and to outside vendors, are processed within a reasonable time.

The City should actively encourage the use of direct deposit by all City employees, and inform all employees of the potential loss of pay in the event of a disaster for those who do not use direct deposit. Additionally, the Controller's Office should work with City employees not currently using direct deposit in order to provide backup account information that can be switched to direct deposit in the event of a disaster. The City should assist those employees without access to a bank account to open an account with a bank or credit union.

The Controller's Office will also direct the established financial policies to guide the City in its response and recovery to an emergency, particularly as it relates to personnel time, contracts, and equipment and supplies relating to the emergency. As a part of this responsibility, the Office should work with other City agencies to determine need for contracts with vendors who do not already occur on existing approved vendor lists, and it should set up these new vendor contracts well before the emergency occurs.

### POLICY 6.3.3.
### Provide the basic needs of all people while lifeline support is interrupted.

Beyond the immediate aftermath of a disaster, and beyond the assurance of infrastructure with explicit life safety purpose, there may still be persistent and critical basic needs for the people of San Francisco as the City recovers from disaster. The City should make a plan and provide support to cover the basic needs for all people while systems are reestablished and communities return to self-sufficiency. The plan should include basic shelter, health, and food needs, and focused on those with the least adaptive capacity for self-care. This includes Environmental Justice Communities, people with disabilities and other functional needs, the young and the elderly, and other vulnerable people.

### POLICY 6.3.4.
### Explore expanding the scope of the City's disaster relief programs.

The City provides financial relief to property owners through tax programs including disaster relief on property taxes, and participation in the state's Section 69.3 property tax disaster relief program which enables former residents who move to other counties to maintain their previous level of property taxation prior to the disaster.

The City should review other forms of tax relief to affected residents and business owners, including reductions on other fees and taxes. There are many local taxes and fees that are under the jurisdiction of the City, and the City has the authority to waive or defer such taxes and fees in an emergency.

Educating residents about the lack of access to funds in the event of a disaster is critical. The Office of the Treasurer and Tax Collector should be involved in working with financial institutions and educating the public on how to access private funds during a time when typical procedures will not be possible. For example, the City can leverage banking contracts to assist residents directly with cash payments.

### POLICY 6.3.5.
### Ensure effective use of public emergency funds and expenditures, and recovery of those expenditures.

The Controller's Office is responsible for tracking expenditures for the cost of responding to, and recovering from, the disaster. This includes tracking, recording, and reporting on all payments made in response to the emergency, including personnel working during the emergency, outside contractor work, and expenses such as supplies, materials, equipment, and vehicles.

It is important that the tasks that are authorized are relevant and necessary, and that their completion is well-documented by the Controller's Office and its supporting agencies. This documentation will be critical in submitting disaster reimbursement claims to the state and federal government and ensuring support funding is received.

## Glossary

This Glossary is intended to define key words and phrases used throughout the Safety & Resilience Element of the San Francisco General Plan, to guide interpretation of the goals, objectives, and policies.

**adaptation, adaptive capacity**

- Adaptation is the ability, competency, and capacity of a system to adjust to variables. Climate Adaptation is the proactive measures taken to adjust the built environment and human systems to reduce harm from the impacts of the climate crisis.

- Adaptive capacity refers to the ability to adjust functions to reduce harm. In social systems, it refers to the ability of institutions and people to problem solve and take opportunities for recovery and reconstruction. It includes the ability of San Francisco's individuals, communities, institutions, businesses, and systems to survive, adapt, and grow, no matter what kind of chronic stresses and acute shocks they may experience. For San Francisco this means (1) the ability to quickly respond and recovery from a disaster or large shock; (2) the ability to address systemic crises such as lack of economic mobility, inequity, poverty, and housing shortages; and (3) the ability to prepare for and address slow-moving disasters like climate change and sea level rise.

**disaster**

- A disaster is a hazard that has occurred, or a hazard event. A disaster is often—but not always—sudden and causes loss of life or great damage. The terms “disaster” and “hazard” are often used interchangeably. See *Hazard.*

**environmental justice, Environmental Justice Communities**

- Environmental justice is the equitable distribution of environmental benefits and elimination of environmental burdens to promote healthy communities where everyone in San Francisco can thrive. Government should foster environmental justice through processes that address, mitigate, and amend past injustices while enabling proactive, community-led solutions for the future.

- Environmental Justice Communities face environmental racism and subsequently bear disproportionate environmental burdens. Environmental Justice Communities are disproportionately low-income communities and communities of color. Leadership by Environmental Justice Communities must be involved in the creation and decision-making of environmental justice solutions. In San Francisco, Environmental Justice Communities are identified through the Environmental Justice Communities Map incorporated here by reference, and are defined as the census tracts with the top 30% of cumulative environmental and socioeconomic vulnerability across the City. The Environmental Justice Communities Map was developed in response to California Senate Bill 1000 (SB 1000) which requires cities and counties to adopt a map of “disadvantaged communities” and adopt environmental justice policies in their General Plan to address “unique or compounded health risks.” The Environmental Justice Map and Framework is expected to be adopted into the General Plan in 2023.

**functional recovery**

- Functional recovery is a standard for buildings and lifeline infrastructure to be designed and constructed to support the basic intended functions of a building soon after an earthquake or other severe hazard, such as eating, sleeping, shopping, or learning. This standard includes maintenance and the restoration of occupancy within a determined maximum acceptable time, and goes beyond life safety standards.

**green building, green infrastructure**

- The principles of green building lead building design, construction, and operation to reduce or eliminate negative impacts, and can create positive impacts, on climate and the natural environment. The local context, such as climate conditions, building types and age, and cultural traditions, contribute to green building approaches. In San Francisco, these principles are supported by the Green Building Code.

- green infrastructure is an approach to water management that protects, restores, or mimics the natural water cycle. It can be effective, economical, and enhance community safety and quality of life. Green Infrastructure incorporates both the natural environment and engineered systems to provide clean water, conserve ecosystem values and functions, and provide a wide array of benefits to people and wildlife.

**hazard**

- A hazard is a source of potential danger or an adverse condition that could harm people, socioeconomic systems, or built and natural environments. Hazards can occur naturally and/or by human influence. As interactions between society and the natural environment are complex, it can be difficult to delineate a singular source of hazards (e.g., human-influenced ignition of fires during drought conditions, development in low-lying areas prone to flooding).
- Geological Hazards include: Earthquake, Tsunami, Landslide, Dam or Reservoir Failure
    - An earthquake is a sudden slip on a fault in the earth’s crust, and the resulting ground shaking and radiated seismic energy caused by the slip.
    - A tsunami is a series of ocean waves caused by sudden movement of the sea floor, typically as a result of major earthquakes.
    - Landslide is a general term used to describe the downslope movement of soil, rock, and organic materials under the effects of gravity.
    - A dam or reservoir failure is an unplanned release of water resulting from the structural compromise or collapse of a dam or other structural element, such as the wall of a tank.
- Weather-Related Hazards include: Flooding, High Wind, Extreme Heat, Drought
    - Flooding is covering or inundation of normally dry land with large amounts of water, can be caused by the overflow of water from a stream, river, lake, coastal body, or a water control feature such as a pipe, dam, or levee.
    - The National Weather Service defines “high winds” as sustained wind speeds of 40 miles per hour (mph) or greater lasting for one hour or longer, or winds of 58 mph or greater for any duration.
    - According to the National Weather Service, extreme heat occurs when the temperature reaches extremely high levels or when the combination of heat and humidity causes the air to become oppressive and stifling. Generally, extreme heat is 10 degrees above the normal temperature over an extended period.
    - Drought is insufficient water over a prolonged period.
- Combustion-Related Hazards include: Large Urban Fire, Wildfire, Poor Air Quality
    - A Large Urban Fire is a large, destructive fire that spreads across one or more City streets.
    - A Wildfire is an unplanned, uncontrolled fire in an area of combustive vegetation or fuel.
    - Poor Air Quality is the condition of ambient air quality having high concentrations of air pollutants that are unhealthy to public health and the environment. The U.S. Environmental Protection Agency measures air quality with the Air Quality Index (AQI), which measures the concentration of five pollutants regulated by the Clean Air Act: ground-level ozone, particulate matter, carbon monoxide, sulfur dioxide, and nitrogen dioxide. When AQI exceeds 100, air quality becomes unhealthy for certain sensitive groups of people, then everyone as air quality worsens.
- Biological and Toxic Hazards include: Pandemic, Hazardous Materials
    - A Pandemic is when an infectious disease outbreak occurs worldwide, or over a very wide area and affects many people.
    - Hazardous Materials are harmful both to human health and to the environment. An accidental hazardous material release can occur wherever hazardous materials are manufactured, stored, transported, or used.

**infrastructure**

- The assets and systems that deliver public services to a community, such as roads delivering goods and transportation options, telephone lines and fiber optic cables delivering internet, pipes and pumps delivering water, and the power grid delivering energy.

**lifelines**

- Lifelines are the systems, assets, and facilities that provide services vital to the function of society and important to emergency response and recovery after disaster. These lifelines include water, sewer, and power provision; communication networks such as phone, radio, television, and internet; transportation; food; shelter; health; and more. By definition, these lifelines can extend beyond City boundaries. For example, state and private agencies operate some regional lifelines, like highways or internet.

**mitigation, hazard mitigation**

- Mitigation is the reduction of vulnerabilities, risks, and impacts of hazards on people, assets, and the environment. Often strategic nearer-term investments, mitigation actions can lessen the scale and intensity of potential future damage, thereby reducing response and recovery expenditures. Proactive hazard mitigation is particularly important for protecting the most vulnerable populations.

- Hazard mitigation is a series of sustained actions taken to reduce or eliminate short- and long-term risks to life and property from hazards.

**racial advantage (or privilege)**

- Racial advantage, or privilege, is the unquestioned and unearned set of advantages, entitlements, benefits and choices bestowed on people solely because of their race.

**racial and social equity**

- Racial equity is the systematic fair treatment of people of all races that results in equal outcomes, while recognizing the historical context and systemic harm done to specific racial groups.

- Social equity is the systemic fair treatment of people of all social groups that results in equal outcomes, while recognizing the historical context and systematic harm done to specific groups, such as along gender identity, sex, religion, and disability status.

**racial disparity**

- Racial disparity is a condition where one racial group systemically and disproportionately experiences worse outcomes in comparison to another racial group.

**recovery and reconstruction**

- Recovery and reconstruction involve activities that restore and rebuild communities post-disaster—with fundamentals such as housing security, business resumption, lifeline restoration, and provision of essential services. The thoughtful rebuilding of day-to-day livelihoods can advance San Francisco towards a more equitable, sustainable, and resilient future.

**resilience**

- Resilience in San Francisco describes the capacity of individuals, communities, institutions, businesses, and systems within the City to survive, adapt, and grow, no matter what kind of chronic stresses and acute shocks they may experience. It is important to note that resilience is a concept that extends beyond preparation for discrete natural disasters and should be defined in connection to issues such as climate change, escalating urbanization, and other disruptions of daily life.

**response**

- Response efforts provide critical information and emergency services during and immediately after disasters. It focuses on saving lives and preventing further injury to people and places, particularly focused on vulnerable populations. Response activities bring immediate support and relief against the social, economic, and environmental consequences of disasters.

**risk, risk reduction**

- Risk is the chance that a given hazard could occur multiplied by the understood consequences of an impact on people, socioeconomic systems, or the built and natural environment.

- Risk reduction includes regulatory controls, plans, policies, programs, projects, initiatives, and anything else employed to eliminate, avoid, or minimize risks.

**safety, life safety**

- Safety is the state of being protected from harm or danger. This includes physical and mental harm from external and internal dangers.

- Life safety refers to building performance that prevents partial or total structural collapse and limits damage to nonstructural and non-life-threatening levels.

**vulnerable communities**

- For the purposes of the Safety & Resilience Element, vulnerable communities describe communities who experience heightened risk and increased sensitivity to potential harms than the City average. To be vulnerable means possessing a lower adaptive capacity to withstand stresses, and often means that these people and places are hit the “first and worst” by disasters. These disproportionate effects are caused by physical (built and environmental), social, political, and/or economic factor(s), which are exacerbated by adverse climate impacts. The specific population groups encompassed by this term vary from issue to issue, and vulnerability can be defined by a variety of factors, such as geography, demographics, health disparities, and asset ownership. For example, vulnerable communities can include seniors, people with disabilities and other function needs, institutionalized or incarcerated people, youth who have been separated from their families, residents of single-room occupancy hotels and public housing, and others. The designation does not describe any intrinsic characteristic of a group of people, but rather a failure of society and systemic actions which have rendered them vulnerable.

2022 Safety and Resilience Element adopted by the San Francisco Board of Supervisors Ordinance 0260-22 on 12/13/2022.

| | |
|---|---|
| **From:** | Mchugh, Eileen (BOS) |
| **To:** | BOS-Operations |
| **Subject:** | Fw: Public Comments to: CEQA Environmental Exemption Appeal Conditional Use Authorization Appeal, 350 Amber Drive |
| **Date:** | Tuesday, December 2, 2025 10:52:02 AM |

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**From:** Allan LeBlanc <allan.leblanc@gmail.com>
**Sent:** Tuesday, December 2, 2025 10:49 AM
**To:** BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Cc:** Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>
**Subject:** Public Comments to: CEQA Environmental Exemption Appeal Conditional Use Authorization Appeal, 350 Amber Drive

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

SF Board of Supervisors,

I encourage you to reject the complaints to the CUA and CEQA exemption filed by the Diamond Heights Community Association and allow this cell phone tower development to proceed as originally planned.

I am a San Francisco resident and father of 3 girls. I previously lived at 977 Duncan Street and am a current resident of Glen Park. My children attended Noe Valley Nursery School next to the Police Academy, and I am a frequent visitor to both Christopher Playground and the Diamond Heights Shopping Center. Our daughters learned to ride their bikes in the Police Academy Parking Lot, one of the few large flat areas in the neighborhood. All that to say, I am very familiar with the proposed location of this antenna and am a member of the impacted neighborhood.

I encourage you to allow the construction of this tower to proceed for the following reasons:

1. Safety - Cell phone service at Christopher Playground and the surrounding area is terrible. Noe Valley Nursery School has to maintain a legacy landline in order to ensure phone access to teachers and parents. I can't tell you how many times a sick kid was picked up late or a parent was unable to quickly get a hold of the school for a family emergency due to the lack of cell phone service.
2. Value of cell service - I have seen the lack of cell phone service impact residents in ways large and small. As a recent example, patients have been unable check in for their vaccine appointments at Walgreens because there is no cell service within the building.
3. Good location - the Police Academy is an excellent location for this tower. The tall eucalyptus trees around Christopher playground will make this tower effectively

invisible from the park. The appearance of the tower has been dramatically exaggerated in fliers distributed by the Diamond Heights Community Association.

4. Regularity in planning and development - These NIMBY concerns and obstruction to regular development in San Francisco are examples of why housing is so expensive in this city. This is a small issue, but the fact that every change in our city requires multiple meetings and appeals is part of the problem. Developers both large and small need predictability in planning, and this is an example of something that will improve the lives of residents and should be approved as a matter of course.

I am unable to attend the meeting in person, but trust this will suffice as a counterpoint to the DHCA objections which are not representative of the entire community.

Sincerely,
Allan LeBlanc

--
Allan LeBlanc
352.514.9626
allan.leblanc@gmail.com

| | |
|---|---|
| **From:** | Dennis |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Proposed communication tower at 350 Amber Drive |
| **Date:** | Tuesday, December 2, 2025 2:49:16 PM |

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

I strenuously object to the proposed AT&T tower at 350 Amber Drive.

It will be a 100 plus tall structure with TWELVE new antennas and NINE new remote radio units and equipment. This huge communication facility is not needed in our neighborhood. It will be an eye sore to our beautiful part of the city.

AT&T is attempting to expand their commercial reach far beyond Diamond Heights. A smaller, lower, one unit antenna could provide adequate telephone service where needed.

Please vote no on this proposal.

Thank you for your consideration.

Dennis Senft
319 Amber Drive.

| | |
|---|---|
| **From:** | Sharon Hom |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Do not want the 104’ antenna |
| **Date:** | Tuesday, December 2, 2025 9:10:09 PM |

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

Our family and neighbors do not want the 104’ antenna at 350 amber st. It is fire  and health hazardous.

I recommend a communication system that will alert us when cell phones don’t work.

Sharon hom
257 gold mine dr

Sent from my iPhone

| | |
|---|---|
| **From:** | Mchugh, Eileen (BOS) |
| **To:** | BOS-Operations |
| **Subject:** | Fw: File No. C251098 – Appeal: Conditional Authorization Use Approval at 350 Amber Dr Project |
| **Date:** | Tuesday, December 2, 2025 9:57:12 AM |
| **Attachments:** | CUA-Appeal-Support-Letter-Amber-Dr-350-Kostiukov.pdf |

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**From:** Vladimir Kostyukov <vladimir.v.kostyukov@gmail.com>
**Sent:** Tuesday, December 2, 2025 9:19 AM
**To:** BOS Legislation, (BOS) <bos.legislation@sfgov.org>; MandelmanStaff (BOS) <mandelmanstaff@sfgov.org>; Ho, Calvin (BOS) <calvin.ho@sfgov.org>
**Cc:** BOS-Legislative Aides <bos-legislative_aides@sfgov.org>
**Subject:** File No. C251098 – Appeal: Conditional Authorization Use Approval at 350 Amber Dr Project

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Honorable Members of Board of Supervisors,

Please find my letter **in support** of the CUA appeal of the AT&T project for the 10-story monopole in Diamond Heights. Our city and our neighborhood doesn't deserve this monstrosity. It's going to be the city's first freestanding cell tower placed in the residential neighborhood, 10 feet away from the park, 200 feet away from the children playground and two pre-schools.

I urge you to stand against corporate greed and side with your neighbours!

To: bos.legislation@sfgov.org, calvin.ho@sfgov.org
Cc: mandelmanstaff@sfgov.org
Title: File No. C251098 – Appeal: Conditional Authorization Use Approval at 350 Amber Dr Project

Honorable Members of Board of Supervisors,

My name is Vladimir Kostiukov, I live on Amber Dr in San Francisco, with my wife Julia and our 2yo daughter Nina. I'm urging you to support the people of Diamond Heights in their right to decide what's needed in their community. This 10-story tower, which is going to be the first ever, free-standing cell tower over 100 feet placed in the residential neighborhood in San Francisco, is absolutely NOT NEEDED next to our park, our playground, our children and elderly.

On September 25, 2025, the city Planning Commission members described the proposed AT&T Cell Tower in the Diamond Heights neighborhood as "desperately needed", following the misleading arguments presented by AT&T. It surely is desperately needed for the success of the business of AT&T as they reach as far as HWT 280 with the new cell tower, but it in no way benefits the community of Diamond Heights - it's quite the opposite and will make their cost of living higher and will put their property values at risk.

Despite 80+ letters in opposition received by the Planning Commission, 20+ people waiting 5 hours in the chamber and speaking their hearts against the project, the city still voted 4:3 to approve it. The people weren't heard and that's why the community were able to come together and collect needed signatures (85 signatures) to file the CUA appeal. The neighbors of Diamond Heights again and again say this project **IS NOT NEEDED NOR DESIRABLE** in our neighborhood and it's our right to decide that.

The Planning Commission was specifically misled by this LTE 700 coverage map presented by AT&T during the hearing.




The map above shows “Existing LTE 700 Coverage”, which refers to **4G LTE** service operating in the 700 MHz spectrum band. 4G LTE is mainly used to deliver internet services on consumer devices, IT’S NOT USED TO MAKE PHONE CALLS or power the SMS protocol. The Planning Commission mistakenly interpreted this map as any cell coverage, assuming people won’t be able to make 911 calls or receive emergency alerts (i.e., Amber Alerts). This is simply NOT TRUE.

Additionally, I question the accuracy and integrity of this map. Here is a photo of my phone I took from the middle of the Christopher Athletic Field (just 100 feet away from the proposed project site), displaying a 5G signal with 4/5 bars. Note - I’m an AT&T customer myself and I think their coverage in Diamond Heights is already one of the best.




What AT&T failed to communicate to the Planning Commission during the hearing is that there are already 7 existing sites with the cell equipment from Verizon and T-Mobile around the Glen Canyon Park, with thousands of happy customers. Note that none of these sites are standalone monopoles - all of these are just equipment placed on the roofs of the building, which is what urban cautious placement should be about.




On September 25, 2025, Lydia So voted to support the AT&T project on the argument of her not being able to receive a call from her child who is at the Glen Park Recreation Center, citing there might be coyotes and the kid needs to be able to call for help. Lydia So didn't realize that there is already an AT&T 5G equipment placed less than one block away from the recreation center. It is in fact the best place to use AT&T around the canyon.




To summarize, the vote the Planning Commission took on Sep 25, 2025 was based on false arguments and misinterpretation and should be overturned by the Board of Supervisor in a fair game. Please restore the democracy and common sense in our city, **vote to support the Diamond Heights community and my family**.

Vladimir Kostiukov,
261 Amber Dr, San Francisco, CA 94131

| | |
|---|---|
| **From:** | Stephanie Pappas |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Opposition letter to At&T tower Amner Drive 94131 |
| **Date:** | Wednesday, November 26, 2025 4:27:25 PM |
| **Attachments:** | Pappas, Steph opposition to At&T Tower Amber Drive.docx |

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Dear Angela Calvello,
Please find my letter regarding the proposed tower in Diamond Heights and include my voice as opposition to this project. Thank you for alerting me to the opportunity to give my opinion
Thank you,

Stephanie Pappas
4235 Diamond heights Blvd #204
San francisco, CA 94131

**November 26, 2025**

Angela Calviaao
Clerk of the Board
City Hall, 1 Carlton  B Goodlett Place room 244
San francisco, Ca 94102
bos@sfgov.org  Sent via electronic transmission 4:20 pm 11/26/25

**Subject: Please Grant Appeal** File No. 251094 **– CEQA Exemption of AT&T Macro Tower – Environmental & Safety Concerns**

Ms Cavillo,

Today I received by mail your invite to comment again on this matter.
In response:

I oppose the proposed tower at 350 Amber Drive in Diamond Heights San Francisco, Ca.
for the several reasons outlined in the following letter.

I live and vote in San Francisco and have for 31 years. This neighborhood is important to me.
I urge you to grant the appeal of the Planning Commission's CEQA exemption for the proposed 104-foot AT&T tower at 350 Amber Drive. I do not want this tower in our neighborhood.

My chief concern is the beauty of the natural space. I consider the impact on wildlife.  I realize that my neighbor's property val;ues will probably go down as no one wants a two story house under a ten story macrotower emitting electromagnetic energy and disturbing the natural beauty at the heart of San Francisco.

I also question the safety of placing not only so much electricity ( has a source been identified?) constantly running so near the eucalyptus trees and other flammable material. The back up tank of diesel fuel is also a safety concern.
These concerns and others are well stated in the following paragraphs:

This huge 10-story tall industrial electronic structure does not belong in a residential neighborhood next to Glen Canyon Park and George Christopher Playground, especially on land mapped as an earthquake/landslide zone with documented seismic failures. It will stand out far above the treeline above Christopher Park and dominate the skyline above Glen Canyon. It is not a small structure like an add on to an existing garage, it is a massive tower!

**Key Safety Issues in this location:**

- **Fire Risk:** This Urban Wildfire Interface area should not have a 190-gallon diesel tank next to combustible vegetation in a very windy area of San Francisco. Towers must power down before water application, causing dangerous delays for evacuation in a neighborhood of two lane streets.
- **Seismic Landslide Risk:** This site has history of seismic failures; it is on CA state and San Francisco hazard maps as landslide area and documented unstable soil cannot safely support this massive heavy structure.

- **Natural Resources:** Glen Canyon Park is on of San Francisco “Significant Natural Resource Areas” and habitat for flora, fauna including many sensitive species of birds that will be endangered both by the construction that will require digging of a hole greater than 60 feet to reach bedrock and by potential fire and landslides.
- **Approval made based on Misleading Claims:** AT&T says the tower is needed for 911 and FirstNet (wireless spectrum for first responders in disasters like 911), but our Fire Chief confirmed 911 doesn't rely on one network, and neither Fire nor Police require First Responders to use FirstNet. ATT counters that they are required by their contract with the Federal Government to provide FirstNET nationwide and signal strength in some areas is too weak to reach FirstNET (as shown by their “simulated” maps). However, FirstNET has signal boosters that can be added to phones without having to add massive antenna structures in residential neighborhoods.

There are only two Wireless Antenna Facilities over 100 feet high in San Francisco both are in commercial areas and atop buildings.

This would be the **first free-standing tower of this height and bulk** near homes and parks in our city and in areas of high fire danger and in landslide/seismic zones.

Other telecom carriers serve this area without such intrusive structures. But one can guess At&T will sell them access to this giant tower for a profit.

I don't believe it's really about better cellular service in Diamond Heights.-but perhaps signals as far away as Sam jose and beyond. 104 feet is really tall.

I see this line we wish to draw against this tall tower as in line with the choice San Franciscans have always made to keep our structures less tall, especially in residential neighborhoods.

Please support the appeal of this exemption and require a full Environmental Impact Report examining safer alternatives and detailed geotechnical studies.

If approved here, AT&T will demand similar towers throughout San Francisco.
Safety must come first.

Sincerely,

Stephanie Pappas

Stephanie Pappas
5235 Diamond heights Blvd #204
San francisco, ca 94131
415 286 2680
stephpappaspi@gmail.com

| | |
|---|---|
| **From:** | Judith Garvey |
| **To:** | Board of Supervisors (BOS); MandelmanStaff (BOS); Mandelman, Rafael (BOS) |
| **Subject:** | Opposition to proposed 104" ATT antenna at 350 amber |
| **Date:** | Wednesday, November 26, 2025 11:46:31 AM |

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Supervisor Mandelman and Board of Supervisors

Continued opposition to proposed 104’ antenna at 350 Amber Drive for many reasons (fire risk, causes cancer, lowers property value, problematic if earthquake). The City does not have a good water defense system in the event of an earthquake and fire to defend Diamond Heights and Glen Park. Our area will look like the disaster areas in Southern California. Keep it out of Diamond Heights and Glen Park.

Sincerely,

Judith Garvey
5526 Diamond Heights Blvd, SF 94131

| | |
|---|---|
| **From:** | BLACKSTONE, CAMMY |
| **To:** | Mandelman, Rafael (BOS); BOS Legislation, (BOS); Board of Supervisors (BOS) |
| **Cc:** | Ho, Calvin (BOS) |
| **Subject:** | AT&T appeals continuance |
| **Date:** | Wednesday, November 26, 2025 11:51:06 AM |

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Dear Supervisor Mandelman,

It is AT&T's understanding that the Diamond Heights Community Association has requested a continuance of the December 9th hearing on its appeals of the Amber Drive CUA Approval and Class 3 CEQA Exemption determination. AT&T does not object this request.

Given the continuance request is pending, AT&T is not submitting responses to the appeals at this time. AT&T will submit its responses in advance of the rescheduled hearing date.

**Carlyn Drivdahl** | **Monchamp Meldrum LLP**
415-704-8831 (office) 530-848-4399 (cell)

100 Pine St. Ste 1250
San Francisco, CA 94111
mlandlaw.com

| | |
|---|---|
| **From:** | Board of Supervisors (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Carroll, John (BOS); BOS Legislation, (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 3 Letters Regarding File Nos. 250700, 250701, 250966, and 251072 |
| **Date:** | Thursday, December 4, 2025 12:06:04 PM |
| **Attachments:** | 3 Letters Regarding File Nos. 250700, 250701, 250966, and 251072.pdf |

Hello,

Please see attached 3 letters regarding File Nos.:

250700: Zoning Map - Family Zoning Plan
250701: Planning, Business and Tax Regulations Codes - Family Zoning Plan
250966: General Plan Amendments - Family Zoning Plan
251072: Planning, Business and Tax Regulations Codes - Family Zoning Plan

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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| | |
|---|---|
| **From:** | Kathy Howard |
| **To:** | DorseyStaff (BOS); MahmoodStaff; MandelmanStaff (BOS); MelgarStaff (BOS); SauterStaff; SherrilStaff@sfgov.org; Board of Supervisors (BOS); WongStaff (BOS) |
| **Subject:** | You vote on the "Family" Zoning plan does not meet the needs of San Franciscans. |
| **Date:** | Thursday, December 4, 2025 11:00:41 AM |

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

Dear Supervisors who voted to approve the Mayor Rich Family Zoning Plan,

Please rethink your vote. There are so many problems with this plan! See my email below. Please stand up for San Franciscans!
Please vote NO next week and make these changes.

Katherine Howard
Sunset District

---

**From:** kh <kathyhoward@earthlink.net>
**Date:** Monday, December 1, 2025 at 9:11 PM
**To:** Supervisor Connie Chan <ChanStaff@sfgov.org>, <ChenStaff@sfgov.org>, <DorseyStaff@sfgov.org>, <Jackie.Fielder@sfgov.org>, <MahmoodStaff@sfgov.org>, Rafael Mandelman <MandelmanStaff@sfgov.org>, <MelgarStaff@sfgov.org>, <SauterStaff@sfgov.org>, Shamann Walton <Shamann.Walton@sfgov.org>, <SherrilStaff@sfgov.org>, A Clerk of the Board <Board.of.Supervisors@sfgov.org>, <daniel.lurie@sfgov.org>
**Cc:** <sean.mcgarry@sfgov.org>, <amy.campbell@sfgov.org>, Theresa Imperial <theresa.imperial@sfgov.org>, <kathrin.moore@sfgov.org>, <derek.braun@sfgov.org>, <lydia.so@sfgov.org>, <gilbert.a.williams@sfgov.org>, Jonas Ionin <jonas.ionin@sfgov.org>
**Subject:** BOS: Postpone vote on the 'Family' Zoning plan.

Dear Supervisors,

The entire City voted on District 4's Great Highway, but once again **District 4**, through no fault of our own, **has NO voice in the upzoning legislation**. This is despite the fact that the upzoning legislation could result in bulldozing our entire neighborhood. We have had a new Supervisor all of one day and no easy way to contact him. He has not had time to hold neighborhood meetings; he has not had the opportunity to find out what his district thinks.

You should **postpone this vote** until we have had the opportunity to meet with our new Supervisor. *We are tired of being ignored*.

As to the legislation, many changes must be made:

- **Eliminate in-lieu fees**. In-lieu fees delay affordable housing and create exclusive enclaves of luxury housing.
- **Dedicate all suitable public land – excluding parks and public open space - to 100% affordable housing.**
- **Preserve the Coastal Zone as it is today.**
- **Prohibit upzoning in the Tsunami Zone.** It is reckless to increase building heights or density in areas at high risk of tsunami inundation.
- **Repair and reactivate the local tsunami warning system**.
- **Protect historic and culturally significant buildings, districts and open space.** All **Category A and A-eligible historic buildings, districts, and open space** should be exempted from upzoning. District 4's mid-century homes and civic buildings reflect our community's unique cultural heritage and deserve preservation.
- **Prevent height increases near parks and schools.** Casting shadows on open spaces and classrooms undermines the very "well-resourced" character of our district that the City claims to value.
- **Install the emergency firefighting system before more density is built, or a major quake and the ocean winds could result in an unstoppable fire that will run from west to east over all of San Francisco.**

Thank you for your consideration of these points.

Sincerely,

Katherine Howard

Outer Sunset

District 4

**From:** Stephen Torres
**To:** Board of Supervisors (BOS)
**Subject:** Letter Re: Family Zoning Plan
**Date:** Tuesday, December 2, 2025 3:12:11 PM
**Attachments:** 2025.12.02.pdf.pdf

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

Dear Clerk of the Board,

Please see my attached letter regarding items 35-38 in today's agenda.

Best,

Stephen Torres

Stephen Torres
Mission District
San Francisco, California

December 2, 2025

The San Francisco Board of Supervisors
Legislative Chamber, City Hall
San Francisco, California 94102

Dear President Mandelman and Members of the Board of Supervisors,

I am writing today to implore you again not to pass the Family Zoning Plan in its current form. Far from an actual plan, it continues to lack the protections and guidance that should be in a plan for our City's future. Vital amendments that could have mitigated the egregious gaps have been rejected and instead this gives over our control wholesale to developers and private equity with very little in regulation and oversight.

Many of you have held that we can do nothing because our hands are being tied by the state or that we cannot stand in the way of progress. I would like to remind you that you were elected to challenge anything that may negatively impact our communities and to guide community determination over our future, not to acquiesce or remain passive. At a time when power is being consolidated to the most wealthy and private interests at every level of government, voting yes on this plan would send a troubling and dangerous signal to San Franciscans as well as Californians when they should have the most confidence in those who represent them closest to home.

Please vote no on this legislation and work for a more representative and integrative plan for all San Franciscans and challenge any mandate from Sacramento or anywhere that removes our City's voice and determination.

Sincerely,

Stephen Torres
District 8 & 9 Worker
District 9 Resident

**From:** D7 Youth Council
**To:** Board of Supervisors (BOS)
**Cc:** Low, Jen (BOS)
**Subject:** Letter of Support - File No. 250700 and File No. 250701
**Date:** Tuesday, December 2, 2025 1:21:15 PM
**Attachments:** Letter from D7 Youth Council.pdf

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

Dear Supervisors,

Please find attached a letter from the District 7 Youth Council for File No 250700 [Zoning Map - Family Zoning Plan] and File No. 250701 [Planning, Business and Tax Regulations Codes - Family Zoning Plan].

Thank you.




November 18, 2025

District 7 Youth Council
d7youthcouncil@gmail.com

Dear Supervisors,

On behalf of the District 7 Youth Council, we would like to express our support for the Family Zoning Plan. The District 7 Youth Council is a body of 15 youths who live or attend school in District 7. Created by former Supervisor Norman Yee, the District 7 Youth Council looks to provide the District 7 Supervisor with guidance on youth issues. Additionally, it works to improve the conditions for youth across District 7.

We all know it's vital to increase housing across the city. However, as a Youth Council representing San Francisco's youth, we especially recognize the importance of prioritizing increasing density around schools and transit corridors. This is crucial for a number of reasons, but above all, it would reduce commuting times for students and traffic on the street. Public transit thrives with more riders, neighborhood small businesses thrive with more neighbors, and local public schools thrive with more kids.

We would also like to express our support for facilitating 2-4-bedroom housing units to incentivize families to stay and thrive in San Francisco. Currently, developers often find smaller studio and one-bedroom units more financially viable, which makes it difficult for families with children to find appropriate housing in San Francisco. Offering density bonuses and implementing zoning modifications as incentives for developers to build 2-4-bedroom units creates financial incentives that align developers' interests and San Francisco's need for family housing. We support Supervisor Melgar's amendment to exempt buildings with three or more rent-controlled apartments from upzoning. This protection for approximately 84,000 rental units balances both safeguarding existing tenants and affordable housing, while still allowing the development necessary to address the city's housing crisis.

We recognize that development may impact local businesses, and we strongly support funds for small business relocation. We encourage creative solutions like Supervisor Melgar's small business construction relief fund, as well as community donations and fundraisers, to help small businesses relocate and continue serving our neighborhoods. Additionally, we need to prioritize finding affordable family housing strategies and implementing strong tenant protections to ensure that existing residents aren't displaced as we work to create more housing opportunities.

As young citizens of San Francisco, we want to be able to continue to live in our beautiful city. For that reason, the D7 Youth Council, on behalf of youth around the city, supports the family zoning plan.

Sincerely,
Sophia Shen, Andrew Martinovsky, Nicole Lee, Edward Naser, Konrad Kruszka
Housing & Transportation Committee, District 7 Youth Council

| | |
|---|---|
| **From:** | Bullock, John (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Carroll, John (BOS); BOS Legislation, (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 6 Letters Regarding File Nos. 250700, 250701, 250966, and 251072 |
| **Date:** | Monday, December 1, 2025 12:18:51 PM |
| **Attachments:** | 6 Letters Regarding Family Zoning Plan.pdf |

Hello,

Please see attached 6 letters regarding File Nos.:

250700: Zoning Map - Family Zoning Plan
250701: Planning, Business and Tax Regulations Codes - Family Zoning Plan
250966: General Plan Amendments - Family Zoning Plan
251072: Planning, Business and Tax Regulations Codes - Family Zoning Plan

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

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| | |
|---|---|
| **From:** | D M LaPointe |
| **To:** | Carroll, John (BOS); Melgar, Myrna (BOS); Mandelman, Rafael (BOS) |
| **Cc:** | Lurie, Daniel (MYR); Wtpcc Delegates; Wtpcc Officers; MelgarStaff (BOS); Board of Supervisors (BOS) |
| **Subject:** | Submission of WTPCC Letter to the Land Use & Transportation Committee |
| **Date:** | Monday, December 1, 2025 11:20:45 AM |
| **Attachments:** | WTPCC-LU-upzoning - 12-1-25.docx |

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Dear Chair and Clerk,

Please find attached the West of Twin Peaks Central Council's letter regarding the Family Zoning Plan for consideration by the Land Use & Transportation Committee. We respectfully request that this letter be entered into the official record for the upcoming hearing.

Thank you for your attention.

--
Denise M. LaPointe
President
WTPCC

# West of Twin Peaks Central Council

*A Resource for Neighborhood Organizations West of Twin Peaks in San Francisco since 1936*

PO Box 27112
San Francisco, CA 94127

http://www.westoftwinpeaks.org/


December 1, 2025

Chair and Members of the Land Use & Transportation Committee:

On behalf of the West of Twin Peaks Central Council and the thousands of homeowners and families we represent, we register our firm and unequivocal opposition to the Family Zoning Plan unless it is substantially amended.

We believe in housing. We believe in growth. And we have proved it - approving and welcoming thousands of new homes at Stonestown, Parkmerced, Balboa Reservoir, and throughout our corridors. Our neighborhoods have done our part and remain ready to do more.

But this proposal is not real planning. It is paper compliance masquerading as progress, shifting the costs and destabilizing impacts onto the very neighborhoods that have kept San Francisco livable, stable, and resilient.

The City's own financial analysis makes one fact unavoidable: only mid-rise redevelopment pencils out. That means this plan incentivizes the demolition of existing homes - not on transit corridors already upzoned by SB 79, but deep inside long-standing, middle-class neighborhoods. SB 79 is already the law. Local zoning will be overridden in 2032. The City should be defending its residents - homeowners and long-term residents alike - not eliminating their remaining protections through density decontrol.

Density decontrol must be removed. Without that amendment, the plan reads as a teardown blueprint, not a family housing strategy.

A central flaw in the proposal is the assumption that so-called "well-resourced neighborhoods" should absorb the city's unmet housing goals, even though these areas do not have the infrastructure capacity to support significant added density. This approach contradicts the City's own service and transit data. Effective equity planning pairs new housing with targeted investment in under-served communities - expanding transit, upgrading utilities, and improving public services where it will meaningfully reduce disparities. Concentrating demolition incentives in stable neighborhoods while leaving actual inequities unaddressed is not sound planning and does not advance the City's stated equity goals.

WTPCC therefore urges the Committee to adopt these essential changes:

**Eliminate density decontrol.**
It is unnecessary, inequitable, and guaranteed to trigger speculative demolition pressure.

**Protect small businesses and merchant corridors.**
West Portal, Taraval, and Lakeside cannot absorb displacement without losing the local merchants who define them.

**Restore design review, public notice, and protection of historic resources.**
Residents - especially longtime homeowners - have the right to transparency. Eliminating due process is unjustifiable.

**Guarantee strong protections for existing homeowners and long-term residents.**
Middle-class families, whether they rent or own, are the backbone of San Francisco and deserve respect, stability, and a meaningful voice.

At the same time, WTPCC and its members are committed partners in real solutions -and we are sounding this alarm now because the unintended consequences of this plan will be profound and irreversible if the City does not course-correct. We stand ready to help the City unlock and incentivize the more than 70,000 approved units already in the pipeline - homes that can be delivered now, without destabilizing established neighborhoods or erasing neighborhood identity.

Our stable, historic, family-oriented neighborhoods are not obstacles - they are the civic bedrock and democratic center of gravity of this city, composed of taxpayers who keep San Francisco running. To ignore this constituency and insist that one community upend its way of life to cover for years of government failure is not equity - it is a fundamental injustice. No credible planning effort punishes families and homeowners for problems created by City Hall.

If the City is serious about housing, it will focus on the 70,000 units already approved - not dismantle the neighborhoods that sustain the city.

Amend this plan. Protect homeowners and tenants, small business and historic resources. And prove that San Francisco can grow without sacrificing the very neighborhoods that make it worth fighting for.

Sincerely,

Denise LaPointe
President | WTPCC

Cc: Mayor Daniel Lurie
Supervisor Rafael Mandelman, President, Board of Supervisors and Members
WTPCC Delegates

| | |
|---|---|
| **From:** | James Lloyd |
| **To:** | Chen, Lisa (CPC); Board of Supervisors (BOS); Board of Supervisors (BOS); BOS-Supervisors; ChanStaff (BOS); ChenStaff; DorseyStaff (BOS); Fielder, Jackie (BOS); MahmoodStaff; MandelmanStaff (BOS); MelgarStaff (BOS); SauterStaff; SherrillStaff; Walton, Shamann (BOS) |
| **Cc:** | Carroll, John (BOS); Dennis Phillips, Sarah (CPC); Cityattorney |
| **Subject:** | public comment re Family Zoning plan for today"s Land Use Committee meeting |
| **Date:** | Monday, December 1, 2025 9:16:51 AM |
| **Attachments:** | CFH v BH - 2023-12-21 - Judgment.pdf<br>San Francisco - Family Zoning Plan - BoS Land Use Committee 2025.12.01.pdf<br>ucb-examining-local-law-policy-planning-practice-on-development-in-sf-using-cales.pdf |

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Dear San Francisco Board of Supervisors,

The California Housing Defense Fund and Californians for Homeownership submit the attached public comment (and referenced attachments) for today's Land Use Committee meeting regarding the Family Zoning Plan, agendized as items 2 through 9.

Sincerely,

James M. Lloyd
Director of Planning and Investigations
California Housing Defense Fund
james@calhdf.org
CalHDF is grant & donation funded
Donate today - https://calhdf.org/donate/

Electronically Received 10/27/2023 11:58 PM

FILED
Superior Court of California
County of Los Angeles
12/21/2023
David W. Slayton, Executive Officer / Clerk of Court
By: M. Mort Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES**

CALIFORNIANS FOR HOMEOWNERSHIP, INC., a California nonprofit public benefit corporation,

Petitioner,

v.

CITY OF BEVERLY HILLS,

Respondent.

Case No. 23STCP00143

**[~~PROPOSED~~] JUDGMENT**

Assigned for all purposes to:
Hon. Curtis A. Kin (Dept. 82)

On September 12, 2023, the Court held a hearing on Petitioner's Verified First Amended Petition for Writ of Mandate. After considering the parties' papers and oral argument, the Court issued the decision attached hereto as Exhibit A.

**NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED**:

1. Judgment is entered in favor of Petitioner on the Verified First Amended Petition for Writ of Mandate.

2. A writ of mandate shall issue pursuant to Code of Civil Procedure section 1085 and Government Code section 65754 (a) requiring Respondent to bring the housing element of its general plan into substantial compliance with state law within 120 days of the date of this judgment, (b) requiring Respondent to bring its zoning ordinance into consistency with the housing element of its general plan within 120 days of the amendment required by (a), and (c) requiring Respondent to

file a return to the writ within 250 days of the date of this judgment.

3. Pursuant to subdivision (a)(1) of Government Code section 65755, the Court hereby suspends the authority of Respondent to issue building permits pursuant to Division 13 (commencing with section 17910) of the Health and Safety Code, and all other related permits, except for permits that create new residential bedrooms or units, and except for permits subject to subdivision (b) of Government Code section 65755, until the City has substantially complied with the requirements of Article 5 of Chapter 3 of Division 1 of Title 7 of the Government Code (commencing with Government Code Section 65300).

4. The Court hereby declares that Respondent City of Beverly Hills has not adopted a substantially compliant general plan housing element

5. Petitioner is entitled to recover its reasonable and legally-authorized costs pursuant to a memorandum of costs to be subsequently filed with the Court.

Dated: 12/21/2023

Curtis A. Kin/Judge

Hon. Curtis A. Kin
Judge of the Superior Court

Respectfully submitted this 27th day of October, 2023
CALIFORNIANS FOR HOMEOWNERSHIP, INC.

Matthew P. Gelfand

Attorneys for Petitioner CALIFORNIANS FOR HOMEOWNERSHIP, INC.

# EXHIBIT A

FILED
Superior Court of California
County of Los Angeles
SEP 12 2023
David W. Slayton, Executive Officer/Clerk of Court
By: M. Mort, Deputy

**Superior Court of California**
**County of Los Angeles**

| | |
|---|---|
| CALIFORNIANS FOR HOMEOWNERSHIP, INC.,<br><br>Petitioner,<br><br>vs.<br><br>CITY OF BEVERLY HILLS,<br><br>Respondent. | Case No. 23STCP00143<br><br>**RULING ON VERIFIED FIRST AMENDED PETITION FOR WRIT OF MANDATE**<br><br>Dept. 82 (Hon. Curtis A. Kin) |

Petitioner Californians for Homeownership, Inc. petitions for a writ of mandate directing respondent City of Beverly Hills to adopt a revised housing element pursuant to Government Code § 65754.

## I. Factual Background

The State of California requires each city to have a "comprehensive, long-term general plan for the physical development" of the city. (Gov. Code § 65300.)[1] Each general plan must have a housing element. (§ 65302(c).) The housing element consists of 'standards and plans for housing sites in the municipality that 'shall endeavor to make adequate provision for the housing needs of all economic segments of the community.' [Citations.]" (*California Building Industry Assn. v. City of San Jose* (2015) 61 Cal.4th 435, 444; *see also* § 65580 [legislative findings concerning housing element law].)

"A municipality must review its housing element for the appropriateness of its housing goals, objectives, and policies and must revise the housing element in accordance with a statutory schedule." (*Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193, 222, citing § 65588(a), (b).) "The interval between the due dates for

[1] All statutory references are to the Government Code, unless otherwise specified.

the revised housing element is referred to as a planning period or cycle, which usually is eight years." (*Martinez,* 90 Cal.App.5th at 222, citing § 65588(e)(3), (f)(1).)

"A revised housing element's assessment of needs must quantify the locality's existing and projected housing needs for all income levels, which includes the locality's proportionate share of regional housing needs for each income level." (*Martinez,* 90 Cal.App.5th at 223, citing § 65583(a)(1).) "The projected regional housing needs for a planning period are determined by the HCD [Department of Housing and Community Development] in consultation with regional 'councils of government.'" (*Martinez,* 90 Cal.App.5th at 223, citing §§ 65584(a) & (b), 65584.01, 65588(e)(3).) "Based on the HCD's regional housing needs determination, each regional council of governments adopts a 'final regional housing need plan that allocates a share of the regional housing need' among the cities and counties within its region." (*Martinez,* 90 Cal.App.5th at 223, citing § 65584(b).)

For the 2021-2029 planning period, the City Council of respondent City of Beverly Hills ("City") adopted a housing element on October 12, 2021 and submitted it for review to HCD. (JR 776.) On January 14, 2022, HCD determined that the housing element did not fully comply with the housing element law and provided necessary revisions. (JR 1309-16.)

On September 28, 2022, the City submitted a revised housing element to HCD. (JR 776.) On November 28, 2022, HCD determined that the revised housing element did not fully comply with the housing element law and provided necessary revisions. (JR 1318-24.)

On February 21, 2023, after having revised the September 2022 housing element, the City adopted the revision. (JR 5.) On February 21, 2023, petitioner Californians for Homeownership, Inc., who monitors local compliance with the housing element law, sent a letter to the City asserting that the revised housing element was inadequate for reasons identified by HCD and petitioner. (JR 1584-85.) On May 12, 2023, HCD determined that the housing element does not substantially comply with housing element law. (RJN Ex. B.)

## II. Procedural History

On January 18, 2023, petitioner filed a verified petition for writ of mandate. On May 24, 2023, pursuant to stipulation, petitioner filed a verified first amended petitioner for writ of mandate.

On June 22, 2023, during the trial setting conference, the Court set the hearing on the instant petition for September 12, 2023.

On July 14, 2023, petitioner filed an opening brief. On August 15, 2023, respondent filed an opposition. On August 31, 2023, petitioner filed a reply.

## III. Request for Judicial Notice

Petitioner's requests for judicial notice are ruled on as follows:

- Exhibit A (September 15, 2017 Assembly Floor Analysis of AB 1397 (2017-2018 Session)) – GRANTED (Evid. Code § 452(c); *Wood v. Kaiser Foundation Hospitals* (2023) 88 Cal.App.5th 742, 751, fn. 4)

- Exhibit B (May 12, 2023 Letter from HCD to City) – GRANTED (Evid. Code § 452(c))

- Exhibit C (Staff Report for June 22, 2023 Meeting of Beverly Hills Planning Commission) – DENIED

- Exhibit D (Minutes of June 22, 2023 Meeting of Beverly Hills Planning Commission) – DENIED

- Exhibit E (Resolution No. 1907 of Beverly Hills Planning Commission) – DENIED

- Exhibit F (2022 Form 10-K for Creative Media & Community Trust Corporation (Excerpts)) – DENIED

- Exhibit G (June 10, 2020 Memorandum of the California Department of Housing and Community Development, Entitled "Housing Element Site Inventory Guidebook") – GRANTED (Evid. Code § 452(c))

- Exhibit H (City of Gardena's 2021-2029 Housing Element, Table C-1) – GRANTED (Evid. Code § 452(c))

With respect to denying the request for judicial notice of Exhibits C, D, E, and F, the Court notes these exhibits are extra-record evidence petitioner presents to demonstrate that certain sites listed in the sites inventory of the housing element are improperly included. For the reason stated in section V.C below, this is improper. The exhibits are accordingly irrelevant. (*Mangini v. R.J. Reynolds Tobacco Co.* (1994) 7 Cal.4th 1057, 1063 ["Although a court may judicially notice a variety of matters (Evid. Code, § 450 *et seq.*), only relevant material may be noticed"].)

## IV. Standard of Review

CCP § 1085(a) provides: "A writ of mandate may be issued by any court to any inferior tribunal, corporation, board, or person, to compel the performance of an act which the law specially enjoins, as a duty resulting from an office, trust, or station, or to compel the admission of a party to the use and enjoyment of a right or office to

which the party is entitled, and from which the party is unlawfully precluded by that inferior tribunal, corporation, board, or person."

"Any action brought by any interested party to review the conformity with the provisions of this article of any housing element or portion thereof or revision thereto shall be brought pursuant to Section 1085 of the Code of Civil Procedure; the court's review of compliance with the provisions of this article shall extend to whether the housing element or portion thereof or revision thereto substantially complies with the requirements of this article." (§ 65587(b); *see also* § 65751.) Substantial compliance means "actual compliance in respect to the substance essential to every reasonable objective of the statute, as distinguished from mere technical imperfections of form." (*Martinez,* 90 Cal.App.5th at 237, internal citations omitted.)

"[A] city's adoption of a housing element is a legislative enactment, something which is generally entitled to some deference." (*Fonseca v. City of Gilroy* (2007) 148 Cal.App.4th 1174, 1191.) "If the municipality has substantially complied with statutory requirements, we will not interfere with its legislative action, unless that action was arbitrary, capricious, or entirely lacking in evidentiary support." (*Ibid.*) The challenging party has the burden to demonstrate that the housing element is inadequate. (*Ibid.*)

## V. Analysis

### A. This Dispute is Not Moot

As a preliminary matter, respondent asserts that the City anticipates adopting a revised housing element in November of this year to address concerns about the current housing element. (Wiener Decl. ¶ 2.) However, there is no guarantee that a revision will be completed by November or that the City will adopt a revision at that time, or at any time thereafter. The Court can only rule based on the current housing element. The instant petition is entitled to preference. (§ 65752.) Further, if the Court were to enter judgment in favor of petitioner, the housing element law provides deadlines for the City to address the deficiencies in the housing element and to submit the revision to HCD. (§ 65754(a).) If respondent were to appeal, the appeal would be given preference also. (§ 65752.) Accordingly, there is no reason to delay ruling on the merits of the operative first amended petition.

### B. Whether Sites Inventory Meets Statutory Requirements

#### 1. Realistic Development Capacity

The inventory in a housing element must "specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing." (§ 65583.2(c).) For a city that does not require a

minimum residential density,[2] the city "shall demonstrate how the number of units determined for [each] site...will be accommodated." (§ 65583.2(c)(1).) As part of the calculation, " [t]he number of units calculated...shall be adjusted as necessary, based on the land use controls and site improvements requirement identified in paragraph (5) of subdivision (a) of Section 65583, the realistic development capacity for the site, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities." (§ 65583.2(c)(2).)

An "assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs" shall include an "analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels...including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development." (§ 65583(a)(5).)

To demonstrate that its inventory is adequate, respondent relies on a Mixed Use Overlay Zone ("Overlay Zone") adopted by ordinance on November 17, 2020, where the maximum residential density within the zone was increased from 0 in commercial areas to 79.2 units/acre. (JR 200, 209.) The Overlay Zone spans the length of the City from east to west and partially north to south, along its largest commercial corridors, including Wilshire Boulevard, Robertson Boulevard, Olympic Boulevard, South Doheny Drive, and South Beverly Drive. (JR 125; *see also* JR 213 [map of Overlay Zone].) In the housing element, the City describes the purported benefits of the Overlay Zone: "This wide-scale rezoning allows for the creation or conversion of non-residential space into residential units, and therefore will create all net new housing, since it does not involve the displacement of any existing occupied housing/residents." (JR 125.)

Respondent argues that the maximum residential density exceeds the minimum 30 units per acre that is statutorily deemed appropriate to accommodate housing for lower income individuals. (§ 65583.2(c)(3)(B)(iv).) Respondent also argues that existing commercial buildings in the Overlay Zone may obtain a permit to convert to a mixed-use building and obtain relief from having to comply with standards concerning parking requirements, loading facilities, outdoor living space, commercial-residential transitional setbacks, or height limits if compliance is physically infeasible. (JR 1636; *see also* Chen Decl. Ex. G [Beverly Hills Municipal Code ("BMMC") § 10-3-1888].) The vacancy rates for commercial buildings also purportedly create an incentive for commercial building owners to convert their buildings to mixed-use projects. (JR 201.)

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[2] It is undisputed Beverly Hills does not mandate a minimum residential density.

For commercial properties listed in the sites inventory of the housing element that were designated for conversion or indicated as having conversion potential (JR 229-34), to calculate the total number of units on the site, the City multiplied the total parcel size by the maximum allowable residential density.[3] However, the total parcel size listed in the sites inventory refers to land area, not the square footage of the existing building that can accommodate residential units. Contrary to respondent's contention, the sites inventory does not account for floor area capacity; the sites inventory lists the height limit of the building, not the number of stories to be converted to residential use. (*See, e.g.*, JR 229 [column name is "Height Limit (stories)," 233 [8500 Wilshire Blvd. described as "8 story building – conversion," but height limit is 3 stories].) As a result, for buildings to be converted to mixed use, the housing element does not demonstrate how the number of units indicated in the sites inventory will be accommodated, as required by section 65583.2(c)(1).

Moreover, as petitioner points out in the reply, most of the sites in the City's sites inventory are not designated as conversions or potential conversions. (JR 229-34.) For sites not indicated as conversions, any construction of residential units is subject to land use and building controls. For example, multi-family developments are subject to height limits from three to five stories. (JR 153-54.) Any building in the Overlay Zone must include commercial uses on the ground floor, and residential uses on the first floor within the first 40 feet from the street are prohibited. (BMMC §§ 10-3-1877(C), 10-3-1879.) Moreover, each multi-family development must have at least 200 square feet for each dwelling unit, excluding front yards, balconies, and pedestrian accessways. (BHMC §§ 10-3-1886, 10-3-2803.)

The sites inventory contains no adjustment based on land use controls for new construction, as required by section 65583.2(c)(2). Rather, like the sites designated as conversions, the number of units for each site is calculated based on the land area multiplied by the maximum residential density. Moreover, the housing element contains no meaningful consideration and analysis of the governmental constraints on the development of housing, as required by § 65583(a)(5). Rather, the City relies on prior approved and proposed developments in arguing in conclusory fashion that "the current standards are not inhibiting development of housing." (JR 158-159, 203-04.) Accordingly, the housing element, including the sites inventory, fails to account for the realistic development capacity for the sites listed in the inventory.

With respect to respondent's contention that the maximum residential density exceeds the density set forth in section 65583.2(c)(3)(B)(iv), this only means that the

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[3] For example, for 8730 Wilshire Blvd., the parcel size is 11,863 square feet. (JR 233.) There are 1/43,560 acres in one square foot. (*See* https://www.britannica.com/science/acre-unit-of-measurement [43,560 square feet in 1 acre].) 11,863 square feet multiplied by 1/43,560 acre per square foot is 0.27 acres. 0.27 acres multiplied by 79.2 units per acre is approximately 21 units.

City does not have to provide an analysis demonstrating how its adopted density accommodates its share of the regional housing need for lower income households. (§ 65583.2(c)(3)(A-B).) However, the City still must adjust the number of units for each site based on the realistic development capacity of the site under section 65583.2(c)(1) and (c)(2) and provide an "analysis of potential and actual governmental constraints upon the...development of housing for all income levels" under section 65583(a)(5).

Petitioner also argues that the City designated the majority of the sites on the sites inventory as 100% low-income or 100% moderate-income housing without explaining the basis for such designation. (OB at 10:6-7.) Petitioner further argues that the City did not adjust the unit counts based on "typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction," as required by section 65583.2(c)(2). (OB 10:7-8.)

Petitioner, however, does not reference any statute that requires an explanation for the basis for the low-income or moderate-income housing designation. The housing element law only requires that the City specify "the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing" and demonstrate "how the number of units determined for that site...will be accommodated." (§ 65583.2(c), (c)(1).) The sites inventory indicates the total number of units for each site. (JR 229 ["Total Units" column].) By indicating the number of units that are designated as low-income or moderate-income housing, the City also indicates "whether the site is adequate to accommodate lower income housing [or] moderate-income housing." (JR 229 ["Lower" and "Mod" columns].) While the City did not explain how the total number of units will be accommodated for the reasons stated above, the designation of housing as low-income or moderate-income is not deficient.

Nevertheless, it is not apparent from the sites inventory whether the City adjusted the numbers for low-income and moderate-income housing based on "typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction." (§ 65583.2(c)(2).) By multiplying the land area by the maximum residential density of 79.2 units per acre and designating all housing as low- or moderate-income housing, the City assumes that all units built on the site will be low-income or moderate-income housing. The City does not account for the possibility that only a certain percentage of the housing on the site will be designated for residents with low- or moderate-income. A revised housing element would need to contain an adjustment based on typical densities at similar affordability levels.

In sum, with respect to realistic development capacity, the housing element is deficient for the following reasons: (1) for conversions, the sites inventory calculates the total number of units based on a product of land area and the maximum residential density without accounting for the floor area of the building; (2) the sites

inventory does not contain any adjustments based on land use controls for new construction; (3) the housing element contains no analysis of the governmental constraints on the development of housing; and (4) the sites inventory does not contain any adjustments based on typical densities of existing or approved residential developments at similar affordability levels in the City.

2. Nonvacant Sites

For nonvacant sites, the housing element law imposes the following additional requirement:

> [T]he city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

(§ 65583.2(g)(1).)

Petitioner argues that the City does not explain how its methodology relates to the sites it has included or excluded in the sites inventory. For underutilized nonvacant sites, respondent explains that it selected sites that were more likely to be redeveloped or converted based on evidence of a lack of investment in the property, such as a lack of maintenance or lack of recent upgrades and improvements; parcels with underutilized improvements; and parcels with existing commercial buildings that are higher than 3 stories but whose floor plan is conducive to residential conversion. (JR 202-03, 210-11.) Respondent also explains that existing uses do not constitute an impediment to additional residential development because the creation of the Overlay Zone creates opportunities for residential development; conversion from non-residential to residential use costs less than new construction; and high residential property values in the City create financial incentives for residential development. (JR 209-10.) However, respondent discusses its methodology for determining development potential generally, without engaging in any site-specific analysis.

Respondent contends that it need not engage in an analysis of the methodology of the development potential for each site. The Court disagrees. Section

65583.2(g)(1) states that, for nonvacant sites, "the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential." Reading the subdivision as a whole, the City is required to provide an explanation of the methodology for each site in the sites inventory. Among the factors that the methodology must consider are "the current market demand for the existing use" and "an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development." (§ 65583.2(g)(1).) These factors necessarily relate to specific sites and cannot be discussed generally. Because the Legislature included these factors, the Legislature surely intended that the City provide "an explanation of the methodology used to determine the development potential" for each site.

Without a site-specific analysis, it is unclear how the methodology was applied. For example, as petitioner points out in the opening brief, the City purports to have excluded commercial buildings that contained medical uses and car dealerships from the sites inventory. (JR 210.) However, the sites inventory includes medical buildings and car dealerships. (*See, e.g.*, JR 229-30 [153 S. Doheny Dr., 239 S. La Cienega Blvd., 8833 W. Olympic Blvd., 8845 W. Olympic Blvd., 9134 W. Olympic Blvd.].) The City does not explain how the existing use does not serve as an impediment to residential development.

For the foregoing reasons, with respect to section 65583.2(g)(1), the housing element is deficient because the City did not provide an explanation of the methodology used to determine the development potential for each site, including a discussion of the factors probative of likelihood of redevelopment set forth in section 65583.2(g)(1).

Further, the sites inventory shows that the City is meeting all of its share of the need for lower-income housing through nonvacant sites. Accordingly, section 65583.2(g)(2), quoted below, is implicated:

> In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.

(§ 65583.2(g)(2).)

For nonvacant sites, the "Field Notes/Existing Conditions & Analysis for Keeping/Removing" column in the sites inventory only indicates the existing use of the site and whether the site is designated for conversion or has conversion potential. (JR 229-34.) The City does not engage in any discussion of occupancy rates, lease terms, viability of the business operating at the sites. Nor does the City present any other discussion demonstrating that the existing use for each site "does not constitute an impediment to additional residential development during the period covered by the housing element." (§ 65583.2(g)(2).) Without any evidence concerning the existing use of each site, the existing use is presumed to impede additional residential development. (*Ibid.*)

Respondent maintains that Culver City and Gardena obtained HCD approval based on a chart similar to its sites inventory. However, unlike Beverly Hills, Gardena's sites inventory sets forth the existing use of each site and why the existing use is likely to be discontinued during the planning period. (Reply RJN Ex. B; cf. Chen Decl. Ex. B at 71 [listing criteria used in selection of sites].) With respect to Culver City, the sites inventory does not set forth the reason why the existing use is likely to be discontinued. (Chen Decl. Ex. A at Appendix B.) However, elsewhere in the housing element, Culver City discusses sites that present opportunities for development based on positive responses from property owners and developers. (Chen Decl. Ex. A at B-9 to B-10.) Unlike Beverly Hills, Culver City discussed how the existing use at certain sites would not impede residential development. Beverly Hills did not engage in any site-specific analysis concerning how the existing use would not impede additional residential development.

Respondent contends that the Court of Appeal in *Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193 determined that no site-specific analysis concerning the methodology used to determine development potential and additional development factors is required. This is not quite accurate. In *Martinez*, the Court of Appeal found that section 65583.2(g)(1) "does not mandate the City 'specify the additional development potential for each [nonvacant] site within the planning period and ... provide an explanation of the methodology used to determine the development potential' *in the housing element itself.*" (*Martinez*, 90 Cal.App.5th at 248-49, emphasis added.) While specification of the additional development potential for each site does not have to be part of the housing element, the City still must demonstrate the additional development potential for each site. In *Martinez*, for example, the City of Clovis provided evidence outside of the housing element to demonstrate the development potential of a nonvacant site. (*Id.* at 249-51.)

Here, there is no analysis of the additional development potential for each site listed in the sites inventory in the housing element or elsewhere. Further, the housing element does not contain findings based on substantial evidence that the existing uses of nonvacant sites are likely to be discontinued, as required by section 65583.2(g)(2).

In sum, with respect to nonvacant sites, the housing element is deficient for the following reasons: (1) the City did not provide an explanation of the methodology used to determine the development potential for each site in the sites inventory, including a discussion of the factors probative of likelihood of redevelopment set forth in section 65583.2(g)(1); and (2) the City fails to demonstrate with substantial evidence that the existing use for each site in the sites inventory does not constitute an impediment to additional residential development during the period covered by the housing element.

C. Specific Sites

Petitioner also contends that certain sites were improperly included in the sites inventory. (OB at 15:6-17:1.) Petitioner maintains that the City did not make the findings based on substantial evidence that are required to rebut the presumption under section 65583.2(g)(2) that the existing use will impede additional residential development. (Reply at 4:13-14.)

However, in contending that additional residential development is not possible on certain sites, petitioner relies on extra-record evidence. For example, for 55 North La Cienega, the sites inventory indicates that the property will have 70 low-income units. (JR 229.) However, petitioner presents a Planning Commission Report and meeting minutes to assert that the City's Planning Commission approved development on the site with only 11 units of very low-income housing. (Gelfand Decl. Exs. C at 1, D at 3-4.)

"[W]here the scope of review of factual findings is substantial evidence, review limited to the administrative record is appropriate because extra-record evidence is irrelevant to whether the agency's decision is supported by substantial evidence." (*Cinema West, LLC v. Baker* (2017) 13 Cal.App.5th 194, 208.) Petitioner cannot challenge the inclusion of sites in the inventory based on extra-record evidence. Ironically, petitioner would have the Court consider the propriety of certain sites based on extra-record evidence, but then bar respondent from presenting extra-record evidence to rebut petitioner's argument. (Reply at 4:18-5:13.)

With respect to sites which petitioner contends are unlikely to disappear based on their existing use (OB at 16:21-17:2; JR 1557-58), the Court already finds that respondent did not make findings based on substantial evidence that the existing use for each nonvacant site in the sites inventory is likely to be discontinued. The City must make such findings in revising the housing element.

## VI. Conclusion

The petition is GRANTED. Pursuant to Local Rule 3.231(n), petitioner shall prepare, serve, and ultimately file a proposed judgment and proposed writ of mandate.

Date: September 12, 2023

HON. CURTIS A. KIN

SCANNED

CALIFORNIANS FOR HOMEOWNERSHIP

CAL HDF

**Dec 1, 2025**

**San Francisco Board of Supervisors**
**49 South Van Ness Avenue**
**San Francisco, CA 94103**

**Re: Housing Element Implementation**

**By email: Lisa.chen@sfgov.org, Board.of.Supervisors@sfgov.org, bos@sfgov.org, bos-supervisors@sfgov.org, ChanStaff@sfgov.org, ChenStaff@sfgov.org, DorseyStaff@sfgov.org, Jackie.Fielder@sfgov.org, MahmoodStaff@sfgov.org, MandelmanStaff@sfgov.org, MelgarStaff@sfgov.org, SauterStaff@sfgov.org, SherrillStaff@sfgov.org, Shamann.Walton@sfgov.org**

**Cc: john.carroll@sfgov.org; sarah.dennis-phillips@sfgov.org; cityattorney@sfcityatty.org**

Dear San Francisco Board of Supervisors,

The California Housing Defense Fund ("CalHDF") and Californians for Homeownership ("CFH") write in advance of the Land Use and Transportation Committee meeting scheduled for December 1, 2025 at 1:30pm. We write to warn the Committee, as well as the larger Board, that certain elements of the proposed Family Zoning Plan violate state law. Specifically:

1. The City's proposed rezonings will not produce sufficient new housing. This violates commitments the City made when it adopted its Sixth Cycle Housing Element.

2. The City's proposed rezonings add new constraints on housing production. This, again, violates commitments the City made in its Sixth Cycle Housing Element and independently violates the Housing Element Law.

3. The "Housing Choice - San Francisco" program seeks to exempt San Francisco from certain state housing laws. That is illegal.

**If the City does not correct these problems, CalHDF and CFH will challenge the City in court.** As a result of the lawsuit, the City would, potentially, fall out of compliance with the Housing Element Law and face exposure to the "builder's remedy." (See Gov. Code, § 65589.5,

subds. (d)(5), (d)(6).) CalHDF and CFH urge the City to avoid such needless litigation and instead comply with the law in the first instance.

## The City's Proposed Rezonings Are Inadequate

The Housing Element Law (Gov. Code, §§ 65580 et seq.) establishes a clear process for the evaluation, planning, and enactment of the City's housing policy. That process has a two-part structure. In the first part, the City must adopt a housing element on a specified timeline and that meets certain requirements. In the second part, the City must implement the programs promised in its housing element. Crucially, the second step relies on the first step: what, precisely, the City must do in the second step has already been established by the housing element. (See Gov. Code, § 65583, subd. (c).) The second step is *not* a freestanding exercise in policymaking or policy analysis. (See *id.*) The policymaking and policy analysis are conducted in the first step, and the Housing Element Law leaves essentially no room to alter the results at the second step.[1]

San Francisco has completed the first step. It adopted a housing element on January 31, 2023, adhering to the substantive and procedural rules in the Housing Element Law. The California Department of Housing and Community Development ("HCD") also certified the City's adopted housing element as legally compliant, pursuant to its statutory authority. (See, e.g., Gov. Code, § 65585.) That housing element made numerous detailed commitments. These commitments include promises to rezone large areas of the City to accommodate housing growth necessary to meet demand and ease upward pressures on housing costs. (See Gov. Code, §§ 65583 [establishing standards for required rezonings]; 65583.1 [same]; 65583.2 [same].) The housing element, moreover, promised not only to rezone, but to engage in detailed analysis that would help shape the rezoning. (See Program 7.1.1 in San Francisco's Housing Element, available here.)

San Francisco is now at the second step of the process: implementing the commitments in its housing element. This includes the aforementioned rezoning and associated policy analyses. The City's proposed rezoning, however, fails to fulfill crucial aspects of housing element commitments – commitments that the City, as explained above, cannot renege on without going through a full amendment process for its housing element.

Program 7.1.1 of the City's housing element commits the City to implementing a rezoning program that "reasonably account[s] for sites' likelihood of development during the planning period using an analytical model." The housing element uses mandatory language, stating that the City "shall" build its rezoning program around such a

[1] If the City wishes to alter the policy analysis or programs promised by its housing element, it has an avenue to do that: it may amend its housing element according to the procedures set forth in Government Code section 65585. But the process remains a two-step process: the City must first amend its housing element, and only then can it proceed to the second step of implementing the promised housing element programs.

"probability-of-development" analysis. In sum: the City must rezone to an extent that the expected number of new units that will be built after the rezoning, calculated via a robust probability-of-development analysis, meets the City's projected housing need (i.e. the Regional Housing Needs Assessment, or "RHNA," allocation, plus a buffer specified in the housing element).

The current rezoning proposal does not do this. The proposal's failure is twofold. First, none of the methods the Planning Department has relied on to assess whether the proposal will satisfy San Francisco's rezoning obligation constitutes a probability-of-development analysis using an analytical model in line with Program 7.1.1 in the housing element. Second, when the City has conducted an analysis that meets the requirements of Program 7.1.1, the analysis shows the current rezoning proposal will not satisfy San Francisco's rezoning obligation.

With respect to the rezoning proposal's first failure: the City proposes three methods to project the number of new units the proposed rezoning can be expected to produce. None of the three methods measures up to the standards in Program 7.1.1.

1. The first method is the "soft sites" method, which is described in appendix B of the City's housing element. This method assumes that a site currently hosting a residential use has a two percent probability of being redeveloped with the rezoning's planned residential capacity and a site currently hosting a non-residential use has a seventy percent probability of redevelopment. Such rigid calculations based on uniform, citywide assumptions about the odds of development on thousands of very different sites are not an "analytical model" and do not "reasonably account for sites' likelihood of development" as required by Program 7.1.1. These assumptions, furthermore, are not reasonable and do not rest on any evidence. They are highly motivated guesswork, and highly motivated guesswork will not cut the mustard.

2. The second method rests on an economic model developed by a consultant. This model does not assess the likelihood of a given site's being developed under the rezoning proposal. Instead, it calculates how many units of housing are "financially feasible" on parcels throughout the City. This is not an "analytical model" that "reasonably account[s] for sites' likelihood of development" as required by Program 7.1.1. As the City well knows, property owners across the City submit permit applications for only a small portion of economically feasible new housing units, and not all of those permit applications ultimately produce actual housing units. The City attempts to address this problem by assuming – similar to the soft sites method – that two percent of sites with economically feasible new housing developments currently occupied by residential uses and thirty-five percent of other sites with economically feasible new housing developments will be developed. This is inadequate for the same reasons the soft sites method is inadequate. Moreover, this

method projects only 19,000 new units of housing over the planning period – far below the 36,282 units the City must accommodate.

3. The third method involves looking at "how much of the City's overall zoning capacity has gotten built out over the years." This – again – is not an "analytical model." Nor does it look at the sites slated for rezoning under the current rezoning proposal and assess the likelihood they will produce new housing. This method is further flawed because much of San Francisco's recent increase in zoned capacity, and much of the new housing that has been built, took place on vacant sites, whereas the proposed housing element rezoning covers a broad swath of the City and comprises mostly non-vacant sites. Other problems here include unrealistically low estimates of the City's residential zoning capacity in prior years (thus inflating the share of residential zoned capacity that has been built out) and the inclusion of residential projects built under development agreements, which do not correspond to rezonings, and which were separately counted towards the City's pre-existing residential zoned capacity in the housing element.

With respect to the rezoning proposal's second failure, analytical models that would satisfy Program 7.1.1 in the housing element demonstrate that the proposed rezoning will not produce anywhere close to the required number of new units. San Francisco's City Economist recently released an analysis of the City's proposed rezoning. This analysis relies on the exact approach that San Francisco's Housing Element pledged to use: an analytical model that assesses the probability of development. (Indeed, it is the exact approach HCD suggested the city use.) The results are damning. In the **best case scenario,** San Francisco's City Economist's analytical model found that the rezoning can only be reasonably expected to produce around **14,646 units by 2045**. Less optimistic assumptions produce a forecast of only 8,504 units by 2045. This indicates the rezoning plan falls far short of what is required: being shown by an analytical model to reasonably be expected to produce **36,282 units by 2031**.

Changes to the planned rezoning since the analysis was conducted have further reduced the amount of new housing that can be expected. The proposed rezoning – specifically, the "Housing Choice - San Francisco" program – has been modified to add new unit mix requirements (see pages 14-15 here) and historic preservation requirements (page 30). The Land Use Committee made these changes despite unambiguous evidence in the record that the changes would reduce new housing's feasibility and reduce the number of new units the rezoning can be expected to create. The problem, then, is *even greater* than what the City Economist's analysis shows.

These are not minor problems. Program 7.1.1 is central to San Francisco's compliance with the Housing Element Law. The City's housing element meets the requirements of the Housing Element Law *only because* it included Program 7.1.1's commitment to rezone based

on a realistic probability-of-development analysis. To be crystal clear: without Program 7.1.1, the housing element does not comply with Government Code section 65583.2, subdivision (g)(2). This is because the housing element relies on non-vacant sites to accommodate more than half of its RHNA allocation at the lower-income level, and thus the Housing Element Law requires its housing element to "demonstrate that the existing use [on each non-vacant site] does not constitute an impediment to additional residential development." (Gov. Code, § 65583.2, subd. (g)(2).) "An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued." (*Ibid.*) San Francisco's housing element does not demonstrate with substantial evidence that specific existing uses on specific sites intended to accommodate low-income housing will not impede additional residential development. Instead, the housing element commits the City, in Program 7.1.1, to rezoning in a manner that "shall reasonably account for sites' likelihood of development during the planning period using an analytical model." That commitment is the basis of the City's compliance with Government Code section 65583.2, subdivision (g)(2). Refusing to follow through on that commitment would leave the City without any basis for compliance with the Housing Element Law on this point.[2]

CalHDF and CFH urges the City to do as the law requires. The City must adopt a rezoning that an analytical model, such as the City Economist's, shows can reasonably be expected to produce 36,282 new units under current economic conditions, as required by Program 7.1.1. Alternatively, the City can increase the probability of sites' development (again, according to a realistic analytical model) by adjusting non-zoning policies that constrain housing production: the City could, for example, reduce transfer taxes for residential projects, impact fees for new residential construction, or inclusionary zoning requirements. The City should not – it cannot – rely on flawed and insufficient analyses to justify its planned rezonings. Doing so violates the law.

## The City Must Reduce Constraints on Housing Production, Not Add New Ones

The City's planned rezoning, although on net it adds new capacity, includes constraints on housing development that do not exist under current zoning rules. Specifically, the proposal includes minimum office densities, caps on dwelling unit size, new limits on curb cuts, and lower parking maximums. Furthermore, the City's proposed local zoning bonus program, known as the "Housing Choice–San Francisco" ("HCSF") program, imposes new limitations on residential projects' eligibility for protections and benefits under state laws, including the Statewide Density Bonus Law.

[2] The City could address this issue by producing site-specific evidence that existing uses on non-vacant sites will not impede additional residential development, adding that evidence to a new draft of its housing element, and adopting the amended housing element. But – again – the City would have to do this before rezoning. The process of developing and adopting housing element commitments and then, separately, implementing those commitments remains a two-step process.

CalHDF and CFH also note that the HCSF program was amended in committee on November 17, 2025 to include additional constraints. The HCSF program now virtually excludes any site in a historic district (see page 30 here). The HCSF now also imposes additional unit mix requirements on new housing projects (see pages 14 and 15 here). With respect to the unit mix requirements, it is silly for San Francisco, a City defined by large, multi-bedroom homes, to require new housing to replicate the bulk of existing housing supply in its bedroom counts. If new housing proposals include fewer bedrooms per unit, on average, that is because San Francisco's existing housing stock is already dominated by multi-bedroom homes; it is natural that new housing will fill a niche that the current housing supply does not.

More importantly, the new unit mix requirements, as well as other new constraints on housing, pose a problem for two reasons.

First, the new constraints were not analyzed by the City's housing element. The Housing Element Law requires local governments to analyze governmental constraints on housing production. (Gov. Code, § 65583, subd. (a)(5).) The results of this analysis then inform the policies and programs in the housing element. (See *id.*; *id.* at subd. (c)(3); *Californians for Homeownership, Inc. v. City of Beverly Hills* (2023) Los Angeles County Superior Court, Case No. 23STCP00143, at p. 6, [finding planned rezonings for housing element site inventory must consider constraints identified by the housing element's constraints analysis] [opinion attached to this letter].) Because the new constraints attached to the City's rezoning proposal were not analyzed in the City's housing element, the City cannot rely on the rezoning proposal to produce as many units as it is required to unless the City analyzes the effects of the new constraints and offsets their impact on housing production.

Second, the City's housing element explicitly recognizes this and commits the City to refrain from adding new constraints. Program 7.1.1 states: "The rezoning program … shall not add government constraints that reduce project financial feasibility as determined by an analysis prior to the rezoning enactment." Program 8.1.6 states: "[A]ny City-adopted rezoning or development controls shall not impose any new governmental constraints to the development of housing unless those increased constraints are offset by the removal or reduction of other constraints." If San Francisco wishes to establish new governmental constraints to housing production (such as making new developments ineligible for the waivers and protections offered by State Density Bonus Law), it must concurrently reduce other constraints to a degree that maintains the overall viability of new residential construction, "as determined by an analysis prior to the rezoning enactment" that assess projects' "financial feasibility." Pursuing the new constraints without offsetting them by reducing existing constraints, however, would violate the commitments in housing element programs 7.1.1 and 8.1.6 and hence violate the Housing Element Law.

## The Proposed Housing Choice–San Francisco Bonus Program Cannot Exempt San Francisco from State Law

The proposed HCSF bonus program provides additional residential zoning capacity for projects that meet certain criteria. Overall, this is good. However, one of the HCSF eligibility criteria poses a problem: the requirement, found in section 206.10(b)(5), that an HCSF project "not receive any density or development bonuses or relief from applicable Planning Code standards in any other State or local law or program." This requirement is unenforceable to the extent it pertains to state law, and, should it be enacted, developers will have the option to ignore it.

This is for four reasons. First, the City "cannot choose to forgo application of land use policies imposed by the Legislature." (*Ailanto Properties, Inc. v. City of Half Moon Bay* (2006) 142 Cal.App.4th 572, 595.) Second, just as the City cannot waive state law's application, project applicants cannot waive protections to which they are entitled under state law, since those protections are designed to serve the public interest. (See Civ. Code, § 3513 ["a law established for a public reason cannot be contravened by a private agreement"].) Third, the SDBL includes explicit rules for local density bonus programs: such programs must build on, rather than supplant, the SDBL. Finally, even if the first three points are ignored, the SDBL allows project applicants to waive the HCSF eligibility requirement forbidding the use of state bonuses. (Gov. Code, § 65915, subd. (e).) Legal interpretations from the California Department of Housing and Community Development ("HCD"), the state agency charged with interpreting and enforcing state housing law, support these conclusions.

### Background

State law contains many provisions that grant rights and protections to proposed housing developments and applications for proposed housing developments. These include AB 2011, codified at Government Code section 65912.100 et seq., the SDBL, codified at Government Code section 65915 et seq., SB 35, codified at Government Code section 65913.4, and more besides. These laws accomplish a variety of pro-housing policies by, among other things, allowing proposed housing developments that meet certain criteria (such as the inclusion of affordable units) to reduce or avoid local zoning and other land use restrictions. In some cases, whether a project is eligible for state law protections and the extent to which it may reduce or avoid local rules depends on the generosity of the local zoning code. For example, the SDBL calculates density bonuses using a "base density," defined as "the greatest number of units allowed under the zoning ordinance, specific plan, or land use element of the general plan." (Gov. Code, § 65915, subd. (o)(6).)

The proposed HCSF program expands the San Francisco zoning code's accommodation for denser housing in much of the City. The aforementioned state laws then further expand the allowed range of housing projects, providing for even greater density and even more

forgiving standards for projects. But there is a catch: the HCSF program attempts to forestall these state laws, in section 206.10(b)(5). If not for proposed section 206.10(b)(5), housing project applicants would be able to propose projects under the HCSF rules and avail themselves of the full range of state law protections. Thus, the critical question is: does proposed section 206.10(b)(5) have any legal effect? As explained below, the answer is no. Developers may use both the HCSF rules and any state law bonuses or protections that apply.

The City Cannot Forgo the Application of State Law

State law preempts local law. (Cal. Const., art. XI, § 7.) This is a foundational constitutional principle, and it is no less true in the land use context than anywhere else. As a corollary to this principle, local governments "cannot choose to forgo application of land use policies imposed by the Legislature." (*Ailanto Properties*, *supra*, 142 Cal.App.4th at 595.) Proposed section 206.10(b)(5), however, attempts to do exactly that: it states, in effect, that state land use laws do not apply to projects proceeding under the HCSF program. The City is careful to word the section to dance around the point, perhaps in recognition of the legal consequences, but the section's intended purpose is unmistakably to "forgo application of land use policies imposed by the Legislature," as caselaw and the California constitution forbid. (*Ibid.*)

As explained above, numerous state laws – particularly the SDBL – grant certain housing projects legal protections. None of these state laws allows local governments to circumvent or opt out of these rules. The attempt to do so, in section 206.10(b)(5) of the proposed HCSF program, does not pass legal muster, and project applicants will be entitled to ignore it.

Project Applicants Cannot Waive State Law Protections to Which They Are Entitled

Just as the City cannot waive the application state land use and housing laws, neither can developers. "[A] law established for a public reason cannot be contravened by a private agreement." (Civ. Code, § 3513.) In other words, if a law is designed to accomplish a public benefit (possibly in addition to private benefits), the law's provisions cannot be waived. ( See, e.g., *County of Riverside v. Superior Court* (2000) 86 Cal.App.4th 211, 220 [holding employment protections for public safety officers, although they benefitted individual officers, also served a broader public purpose and could not be waived].) The legislature has made clear that pro-housing laws serve the broader public interest.[3] (See, e.g., Gov. Code, §§ 65915, subd. (u); 65913.4, subd. (u); 65582.1; Stats. 2024, ch. 294, § 1; Stats. 2023, ch. 783, § 1.) The legislative history for these laws, moreover, confirms they are intended to serve the public by

[3] On one occasion, California courts found that a law establishing time limits for housing permit application processing primarily benefitted project applicants and not the general public, and hence project applicants could waive them. (*Bickel v. City of Piedmont* (1997) 16 Cal.4th 1040, 1049-1052.) The legislature immediately rebuked the Courts and overturned the *Bickel* holding through legislation. (See *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1439.)

expanding the supply of housing and affordable housing. (See *Doskocz v. ALS Lien Services* (2024) 102 Cal.App.5th 107, 115-116 [legislative history is relevant in deciding whether law serves a public purpose and hence cannot be waived].) Hence, project applicants have no authority to disclaim the application of these laws, as the City's proposed HCSF program would have them do.

Two additional reasons prevent project applicants from waiving their right to pursue state law protections.

First, as with all legal waivers, such a waiver must be voluntary. (*Harvey v. County of Kern* (1930) 107 Cal.App. 590, 597.) As currently framed, the HCSF program does not ask project applicants to voluntarily waive their state law rights. It instead makes waiver *mandatory* for any project applicant. No waiver can occur through such an ultimatum; to the extent that the issue is unclear, moreover, the ambiguity resolves against the existence of a waiver. (See *Perini v. Perini* (1964), 225 Cal.App.2d 399.)

Second, waiver requires "an abandonment of a right that could be enforced or a privilege that could be exercised." (*Estate of Goyette* (1971) 14 Cal.App.3d 224, 232 [internal citations omitted].) Thus, for an applicant to be able to waive the application of state law to an HCSF project, it must be the case that the applicant could, absent the waiver, enforce the application of the relevant state law. And it must be the case, from there, that the applicant could choose *not* to waive their rights and instead apply state law protections and bonuses to their project. In this way, the City faces a catch-22, and however it resolves the dilemma, developers will be able to use both the HCSF program and state law.

## The State Density Bonus Law Creates Narrow Guidelines for Local Bonus Programs, Which the HCSF Program Does Not Obey

The SDBL does allow local governments to implement local bonus programs. It includes strict rules for such programs, however, which the proposed HCSF program does not meet. Local bonus programs must add to, rather than supplant, the SDBL. Government Code section 65915, subdivision (n), states: "nothing in this section shall be construed to prohibit a city, county, or city and county from granting a density bonus *greater than* what is described in this section for a development that meets the requirements of this section" (emphasis added). By negative implication, local governments are forbidden from offering density bonuses that do not incorporate, at minimum, the bonuses allowed by the SDBL. Local bonus programs must add to the SDBL; they cannot displace it in favor of an entirely separate density bonus scheme. As described above, moreover, preemption principles prevent local governments from evading the SDBL, and this language in the SDBL confirms that outcome.

The SDBL includes stronger language too. Government Code section 65917 states:

> In enacting this chapter it is the intent of the Legislature that the density bonus or other incentives offered by the city, county, or city and county pursuant to this chapter shall contribute significantly to the economic feasibility of lower income housing in proposed housing developments. **In the absence of an agreement by a developer in accordance with Section 65915, a locality shall not offer a density bonus or any other incentive that would undermine the intent of this chapter.**

(Emphasis added.) In other words, if San Francisco wishes to offer a density bonus to developers, it must first allow them any protections they are entitled to under the SDBL. Only then can it offer a local bonus program. The law establishes a clear baseline: project applicants may avail themselves of any bonuses and benefits they are entitled to under the SDBL, and further local bonuses and benefits must come on top of the SDBL.

These rules are especially important in San Francisco. HCD has found that the SDBL is "critical" for developers navigating San Francisco's complex zoning rules and extensive procedural hurdles. (See "Examining Local Law, Policy, and Planning Practice on Development in San Francisco Using CALES," O'Neill et al., pp. 38-39 (available here and attached to this letter).) In some cases, HCD has issued Notices of Violation to San Francisco for impeding housing development by refusing to grant bonuses, incentives, and waivers allowed by the SDBL. (See, e.g., California Department of Housing and Community Development, Letter to Kate Conner, December 29, 2022 (available here).) These HCD findings and Notices of Violation confirm the SDBL's importance in producing housing in San Francisco.

The proposed HCSF program, by attempting to displace the SDBL entirely, violates the SDBL's explicit rules for a local bonus program. This violation carries particular significance for San Francisco, where project applicants often rely on the SDBL to navigate a complex zoning code and approval process. If San Francisco wishes to implement a local bonus program, it must stack that program on top of the SDBL. It cannot offer an "alternative" bonus program, such as the proposed HCSF program, that attempts to remove SDBL eligibility for projects that are eligible for SDBL protections.

In closing this section, CalHDF and CFH point out that HCD has weighed in on the question of whether local governments may enact zoning bonus programs that serve as alternatives to state law. In a letter to Menlo Park (available here), the Department wrote: "[T]he City's Affordable Housing Overlay states that the overlay will be an alternative to state density bonus law. **This is in conflict with state law and must be revised."** (Emphasis added.)[4] HCD's

[4] Separately, as explained later in this letter, HCD's Site Inventory Guidebook (available here) analyzes whether zoning overlays or other local zoning programs established by a city's housing element may supplant or displace the SDBL and firmly establishes that they cannot. (See pages 14-15 of the guidebook.) This analysis is more relevant to the question of how the HCSF program will affect the City's compliance with the Housing Element Law, but this analysis also underscores the specific point that the City may not wriggle out of state law.

view warrants substantial deference as the interpretation of a "technical, obscure, [or] complex" statutory scheme by the agency charged with enforcing it. (See *Boling v. Public Employment Relations Bd.* (2018) 5 Cal.5th 898, 911 [citing *Yamaha Corp. of America v. State Bd. of Equalization* (1998) 19 Cal.4th 1, 12]; *Hoffmaster v. City of San Diego* (1997) 55 Cal.App.4th 1098, 1113, fn. 13 ["We substantially rely on the Department of Housing and Community Development's interpretation [...] regarding compliance with the housing element law"].)

Even if the City Can Prohibit the Application of State Law, the Density Bonus Law Gives Project Applicants the Legal Right to Circumvent the City's Prohibition

Even if the above legal rules do not neutralize the City's attempt to avoid state law, any project eligible for the SDBL will be able to defeat the application of proposed section 206.10(b)(5). The SDBL states: "In no case may a city, county, or city and county apply any development standard that will have the effect of physically precluding the construction of a development meeting the criteria of subdivision (b) at the densities or with the concessions or incentives permitted by this section." (Gov. Code, § 65915, subd. (e)(1).) If a proposed project complies with the HCSF except for section 206.10(b)(5) – because it seeks benefits under the SDBL or another state law – and the application of section 206.10(b)(5) would physically preclude the project by eliminating its eligibility for the HCSF, then the City cannot apply that section to the project. To the extent the City doubts or intends to contest this, CalHDF and CFH remind the City that the SDBL, by its terms, "shall be interpreted liberally in favor of producing the maximum number of total housing units." (*Id.* at subd. (r).) Flouting the law on this point also carries severe penalties, including mandatory payment of attorney's fees to a project applicant who challenges the City in court. (*Id.* at subd. (e)(1).)

## The HCSF Program Violates the Housing Element Law

Furthermore, the HCSF violates the Housing Element Law (Gov. Code, § 65580 et seq.). Rezoning programs enacted pursuant to a housing element, such as the proposed Family Zoning Plan and its component HCSF program, may not exempt themselves from state law's application, as HCD has explained in its Site Inventory Guidebook (available here – see pages 14-15). Pursuing the HCSF program as it is currently designed would violate this rule and risk the City's housing element compliance. This would expose it to a range of penalties, including the "builder's remedy."

## The City Should Take Care to Comply with New Caselaw Concerning Housing Element Rezonings

Lastly, CalHDF and CFH warn the City to take care to ensure that the rezoning complies with housing element law requiring minimum residential density on low-income sites. The newly published Court of Appeal decision *New Commune DTLA LLC v. City of Redondo Beach* (Oct. 10, 2025, No. B336042) 115 Cal.App.5th 111 makes clear that in order to comply with

minimum density requirements, local zoning must require that all new development include a minimum density of residential use. Zoning "overlays" that allow for 100% non-residential development on a site fail to comply with housing element law. The proposed zoning includes many low-income sites that are given additional residential density on top of base commercial zoning. In order to comply with housing element law, the City should make clear that all new development of these sites must include the minimum density of residential use, and that 100% commercial development is prohibited.

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New multifamily housing in San Francisco a public benefit: it will help satisfy demand for housing near jobs and transit, thereby reducing displacement pressure; and it will also cut down on transportation-related greenhouse gas emissions by providing housing in a major metro area, as opposed to farther-flung regions in the state (and out of state). CalHDF and CFH therefore urge the City to follow through on the commitments in its housing element, as the law requires, and obey state law in drafting and enforcing its land use regulations.

Sincerely,





Matthew Gelfand
*Californians for Homeownership*

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*CalHDF*

# Examining Local Law, Policy, and Planning Practice on Development in San Francisco Using CALES

**Report in Support of San Francisco Policy and Practice Review**

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Disclaimer: The statements and conclusions in this Report are those of the contractor and not necessarily those of the California Department of Housing and Community Development.

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# Executive Summary

## Background: Why Study San Francisco?

San Francisco is the anchor city in the Association of Bay Area Governments (ABAG) region, with one of the highest Regional Housing Needs Allocations (RHNA) statewide. Complex processes that lead to delayed housing development approvals leave open questions about whether San Francisco's local legal regime will allow the city to meet this housing production target.

In 2016, authors O'Neill, Biber, and students launched the Comprehensive Assessment of Land Use Entitlements Study (CALES) at the University of California, Berkeley, to understand how cities, including San Francisco, design and apply local and state law to proposed developments of five or more units approved in 2014 - 2017. In an earlier report,[1] we found San Francisco's local regulatory regime comparatively prohibitive, risking exclusionary zoning despite explicit policies to promote inclusion and fair housing goals through inclusionary housing programs, rent stabilization, and tenant protections. Among the 28 jurisdictions we studied, San Francisco was among the cities with more land zoned for dense housing, although that zoning was not equitably distributed citywide. But most notable, among all our study cities, San Francisco was an *extreme* outlier in process requirements and timeframes to approval. The city had a median timeframe to entitlement of over two years for code compliant multi-family housing that benefited from streamlined environmental review.

San Francisco's median timeframe was not only longer than its neighbors, it was longer than timeframes in neighboring cities with purportedly more difficult local law. Berkeley, for example, has complex rules that require a use permit[2] for all new housing development, and yet the median timeframe to entitlement was four months shorter for comparable multi-family housing. Moreover, once we parsed out our data to explore how environmental review streamlining might impact timelines, we found that Berkeley's median timeframe dropped to less than 10 months for apartment buildings, whereas San Francisco's remained at 24 months for the *same type of housing*. San Francisco exemplified how cities can write and implement procedural rules in a manner that creates uncertainty of approval. Uncertainty creates risk, and risk influences what developers will propose and build, as well as which developers will consider developing within a city. During our research, affordable developers who worked in neighboring cities explained they could not work within San Francisco because entitlement was too uncertain and difficult.

California's legislature has passed nearly 100 laws relevant to housing policy since 2016.[3] These laws seek to spur housing production across all income levels and promote equitable housing outcomes—namely increased housing production in high opportunity locations. Many important changes to state housing law target subjectivity in discretionary processes, like

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[1] We refer here to our Report to the California Air Resources Board in fulfillment of Contract #3900-19STC005. MOIRA O'NEILL-HUTSON ET AL., EXAMINING ENTITLEMENT IN CALIFORNIA TO INFORM POLICY AND PROCESS: ADVANCING SOCIAL EQUITY IN HOUSING DEVELOPMENT PATTERNS (2022). We also cross reference prior publications.

[2] Project proponents apply for a use permit, often referred to as a conditional use permit, when local rules allow for certain uses subject to approval—but not as a matter of right under the local zoning.

[3] *See* Ben Metcalf, Managing Dir., UC Berkeley, Terner Ctr. for Hous. Innovation, Presentation at the California Joint Oversight Hearing with Assembly Housing and Community Development Committee: Housing Production: Recent Legislative Actions and Outcomes (Feb. 28, 2023), https://shou.senate.ca.gov/node/21.

planning review,[4] and work towards quickening approval processes, particularly for multi-family housing. New law and policy aim to accelerate housing production in high opportunity areas, inviting important questions about how well San Francisco has implemented these laws and whether they effectuate production, affordability, and equity. To answer these questions, we expanded and extended CALES to explore San Francisco's local land use regulation in more detail and identify specific roadblocks to dense multi-family housing. This report details our methods, presents findings, and discusses their implications for the California Department of Housing and Community Development's (HCD) Policy and Practice Review.

## Research Questions and Approach

HCD asked (1) whether San Francisco is fully implementing key state housing laws, such as the Housing Accountability Act, the Housing Crisis Act, the Permit Streamlining Act, Senate Bill 35 (SB 35), and State Density Bonus Law; (2) whether local implementation is allowing these state laws to achieve their intended effect of promoting housing production and affordability; (3) what causes delay in the entitlement process and how the city's discretionary review process impacts overall project timelines and the housing approvals pipeline.

To answer these questions, we used a spiraling mixed methods research design that joins legal research and qualitative, quantitative, and spatial analyses to understand San Francisco's local regulatory environment. This design helped our study overcome some of the limitations of each method and allowed us to adapt our research approach to the specific needs of studying San Francisco.

HCD's questions one and two require us to interpret our data and provide findings based on our interpretation of what state law requires of localities.[5] For example, we interpret the Permit Streamlining Act, Housing Accountability Act, and Housing Crisis Act as applicable to all multi-family housing approvals in San Francisco that do not require a local legislative action. We define "full implementation" of these state laws to mean that San Francisco both complies with state law, but also that local rules or planning practices do not effectively circumvent the purpose of the limitations imposed on cities by state law.

We built a unique and highly detailed dataset of 140 planning entitlements[6] of five or more units issued in 2014 - 2017. We added 144 observations of entitlements and SB 35 approvals issued

[4] For a discussion of what characterizes a discretionary action, see Friends of Westwood, Inc. v. City of Los Angeles, 181 Cal. App. 3d 259, 269-74 (1987). When city employees can set standards and conditions for many aspects of a proposed building, the approval process is discretionary. For a definition of a ministerial process in California law, see Prentiss v. City of S. Pasadena, 15 Cal. App. 4th 85, 90, 18 Cal. Rptr. 2d 641 (1993) (citing CAL. CODE REGS., tit.14, § 15268(b)(1) (2023)("'Ministerial' describes a governmental decision involving little or no personal judgment by the public official as to the wisdom or manner of carrying out the project. The public official merely applies the law to the facts as presented but uses no special discretion or judgment in reaching a decision. A ministerial decision involves only the use of fixed standards or objective measurements, and the public official cannot use personal, subjective judgment in deciding whether or how the project should be carried out.")). Importantly, ministerial decisions are exempt from environmental review under the California Environmental Quality Act.

[5] We discuss this in the report; our analysis depends on some assumptions about what "full" implementation of state law would entail.

[6] We refer to "entitlement" as a process and "entitlement" as an observation of that process in the singular and plural throughout this report. Entitlement refers to the type of housing approval that a project proponent secures from the Planning Department, Planning Commission, or Board of Supervisors when

in 2018 - 2021 to this dataset.[7] Our approvals dataset captured detail on each application and approval step under local rules and state law (like the California Environmental Quality Act, or CEQA) and important project characteristics (like affordability, building size, and location). We gathered the detail for our dataset from source documents (application documents, planning staff reports, and motion and resolution documents) wherever possible. We analyzed our data using statistics and mapping.

We conducted in-depth interviews and used participant observation and primary document analysis to understand why San Francisco's approval process operates the way that it does. We analyzed more than 35 hours of confidential in-depth research interviews with 24 participants representing affordable and market-rate developers, former and current city personnel and staff that work on housing development, land use attorneys, and housing advocates.[8] We observed and analyzed notes and transcripts from another 33 meetings that HCD convened with approximately 146 stakeholders. Most were approximately one hour long. Twenty-five of the HCD-led meetings were very small, with one to three participants, in addition to O'Neill and one representative from HCD. The small meetings allowed participants to offer deep insights, much like research interviews. In all, we analyzed notes and transcripts from ~68 hours of research interviews and meetings with 14 individuals across the executive and legislative bodies within San Francisco, over 20 former and current planning staff, more than 60 development professionals (evenly split between affordable and market-rate developers), and 6 different housing advocacy groups. We analyzed materials to extract themes and looked for frequency of themes across stakeholder groups. We also cross-referenced written law, recordings from hearings, approval documents, and analyses from our entitlement data.

### Limitations of Research Approach and Analysis

Each method and data point has some limitations. For example, each observation in our approval dataset represents a potential housing or mixed-use development that developers believed had a high enough probability of success that they were willing to pursue entitlement in the first place. There are no project denials in the database to allow for quantitative analysis, but we do have limited data on a few denials we examined during data collection. Gathering data on project denials in a systematic way (for quantitative analysis) would demand substantially expanding the scope of the research project, which was not feasible given the research timeframe. Further, defining a project denial for data collection and analysis is more complex than defining an entitlement. A denial includes what the city reports as a denial but should also include projects that the city effectively "denied" (where a political body denied a specific entitlement, for example) even though the project remains pending within the city's public portal

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the local law reviews a proposal to build housing through a discretionary process. Discretionary review is a legal concept that means the city can set standards and conditions for many aspects of a proposed building and the approval process is discretionary. An entitlement typically precedes the building permit process, and it is a process that involves planning department review of a proposal to build housing and potentially requires an approval from a local elected or appointed political body. A ministerial process involves a public official applying law to fact without discretion or subjective judgment. Often, building departments issue ministerial approvals. Uniquely, state law creates a ministerial process that also involves planning review—which we discuss at length in the full report.

[7] Corrected Annual Progress Reports helped us identify 11 observations late in our research process. We were able to code essential characteristics for these 11 observations to include them in our summary statistical analyses only.

[8] Eighteen participants sat for interviews in 2022 - 2023, and several participated in more than one interview. We also analyzed transcripts from six interviews across the same stakeholder groups in San Francisco (affordable developers, planners, market-rate developers, and community-based organization advocates) that O'Neill conducted in 2017, where comparisons with prior years was useful.

or in its annual reporting. For the purposes of research, a denial could also include a project from which a developer appears to voluntarily withdraw after the city determines that it will not approve the project or will impose conditions that render the project infeasible. There also may be no documentation to verify whether a project that appears to be pending has effectively been denied. In our work, however, where we come across developments that have advanced in the entitlement process but are ultimately denied, we do discuss those developments.

All interview participants volunteered, as did all participants in HCD-led meetings. Voluntary participation in interviews and research meetings increases selection bias and limits the generalizability of findings.[9] We increased the number of interviews in each stakeholder group and triangulated data and methods to augment the overall reliability of our findings from interviews where possible. Some topics do not allow for this, however. For example, developers may discuss why they are unwilling to apply for entitlement, but there is no other data to explore to understand what deters applications beyond what the interview participants shared.

## Summary of Findings

HCD asked whether the data indicates San Francisco has fully implemented state housing law intended to promote housing production and affordability. **All data generally indicates that the answer is no.**

San Francisco's local rules embed subjectivity and uncertainty into review processes that state law says should be objective, time constrained, and, in some cases, certain. The city's authority to apply discretionary review to any permit, and the ease with which project opponents can appeal planning approvals and permits (including post-entitlement permits) to the Board of Supervisors or Board of Appeals fosters planning practices that limit full implementation of the Permit Streamlining Act, Housing Accountability Act, Housing Crisis Act, and in some instances, SB 35 and State Density Bonus Law. Planning staff are concerned about whether planning review will survive scrutiny from local political bodies, not the courts. Planning staff anticipate local political bodies will ignore planning recommendations and extend review processes if that is what neighborhood-level politics demand. Planning practices reflect this assumption, and local policy reinforces it. Developers interpret this planning practice as requiring more than what the law "on paper" demands through negotiation outside of public hearings to satisfy neighborhood interests. Developers perceive all planning approvals as uncertain and risky, even if the proposed development conforms to all zoning and planning standards. Eight years of approvals data confirms these perceptions. The risk and uncertainty embedded into local law has driven some developers to leave the San Francisco market and has deterred other developers from entering the market entirely.

Below, we elaborate on what the data tells us about the direct effects of specific state housing laws on San Francisco's housing approval process, what all data tells us about San Francisco's implementation of different state laws, and the relationship between local rules, planning practices, and lengthy entitlement outcomes. The report that follows details each finding.

[9] Selection bias refers to research participants not being fully representative of the group to which they belong. This limits our ability to interpret what we hear as the perspectives of a particular stakeholder group, generally.

## SB 35 fixes planning review for eligible housing developments but is not a complete process fix.

Data shows San Francisco Planning diligently implemented SB 35. Approximately 36 professionals who work on affordable development unanimously reported that SB 35's ministerial process "fixed" planning review for affordable housing developments because the state law created certainty of planning approval where none existed previously. Stakeholder perceptions are borne out in the planning approval data. Table 1 shows that the median timeframe for planning approval for developments that applied only under SB 35 was ~3.4 months and could take up to eight months. In contrast, code compliant discretionary developments[10] requiring only a building permit had a median timeframe of two years and could take as many as four years.

*Table 1: Timeframes to Planning Approvals Issued in 2018 - 2021 Selected Pathways*

| Process Category | Timeframe (Months) | | | |
|---|---|---|---|---|
| | Minimum | **Median** | **Mean** | Maximum |
| SB 35 only (N=9)[1] | 0.89 | 3.42 | 4.24 | 7.62 |
| Discretionary building permit only (N=13) | 7.76 | 24.20 | 24.67 | 47.70 |

[1]This count does not include five applications that developers proposed as discretionary approvals, some before SB 35's enactment, that San Francisco later approved under SB 35.

Importantly, stakeholder interviews indicate SB 35 provided both affordable developers and planning staff relief from San Francisco's local rules. Data on how San Francisco Planning processed applications for development before SB 35 indicates Planning prioritized expediting 100% affordable developments.[11] Local law still limited how quickly planners could complete review for any development, including 100% affordable development that the city helped fund. In fact, the city entitled only five 100% affordable developments in 2014 – 2017, which would yield 567 units if built. The median timeframe to approval for these five 100% affordable developments was 15 months. In contrast, SB 35's ministerial process allowed San Francisco Planning to approve 14 100% affordable developments that would yield 1,663 affordable units if built. The median timeframe for the SB 35 100% affordable developments was less than 7.5 months, inclusive of developments that began as discretionary developments and later applied for SB 35 eligibility review. The median timeframe for 100% affordable housing developments that only applied for approval under SB 35 was less than three months. Most SB 35 developments also used State Density Bonus Law, so they were, on average, larger as compared with another three discretionary 100% affordable developments San Francisco approved in 2018 – 2021, or the five entitled in 2014 - 2017.

However, SB 35's effects are limited to planning review. All stakeholders still describe the post-entitlement approval process as subjective, lacking standardization and sufficient oversight.

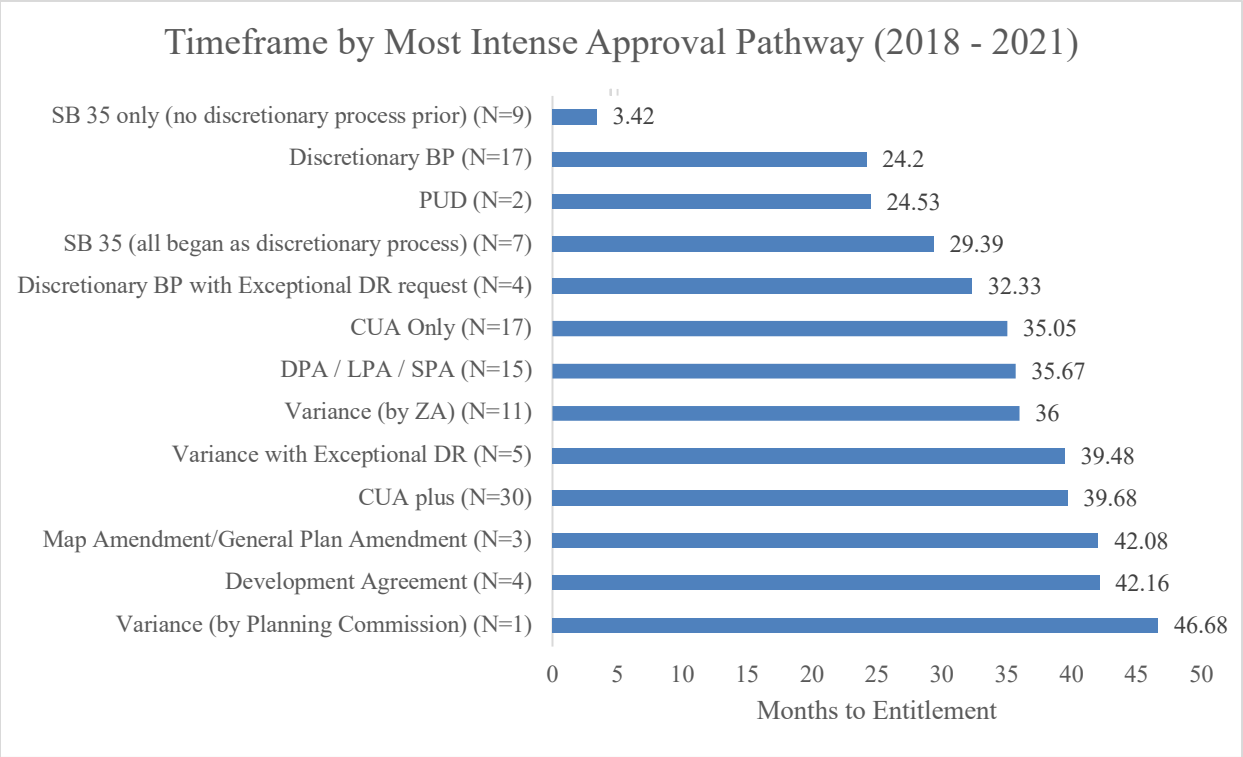
[10] Code compliant discretionary development means proposed housing development that conforms to all zoning and only requires a building permit. San Francisco law provides that this development is subject to discretionary review.

[11] Interviews at that time indicated internal work and analysis to expedite affordable development, but median timeframes for 100% affordable developments were still 15 months.

Stakeholders share that the post-entitlement permitting process depends entirely on the professional assigned to the project, not the project scope itself. Stakeholders report that subjectivity in the post-entitlement process can trigger additional planning review even after a project has moved to the Department of Building Inspection. Because SB 35 is limited to the planning review stage, the state law has no effect on these post-entitlement procedural issues. Developers share that because San Francisco's law offers opportunities for project opponents to challenge, or appeal, permits after entitlement, including demolition permits, SB 35 eligible projects are susceptible to process challenges after planning review as well.[12]

SB 35 also does not represent a complete fix for San Francisco's procedural challenges. SB 35 applies to qualifying projects so long as San Francisco keeps failing to meet its housing production targets. But missing housing production targets is not San Francisco's goal. **Still, San Francisco's implementation of SB 35 signals what is possible with a ministerial process while also spotlighting San Francisco's problematic existing discretionary review.**

*Figure 1: Process Approval Pathway Timeframes*




Graphic Developed by Dori Ganetsos using CALES data.

[12] The recent appeal of demolition permits for an SB 35 development located at 2550 Irving demonstrates this point.

## Unpredictable discretionary review processes create uncertainty and risk—even for code compliant development of any size in any location citywide.

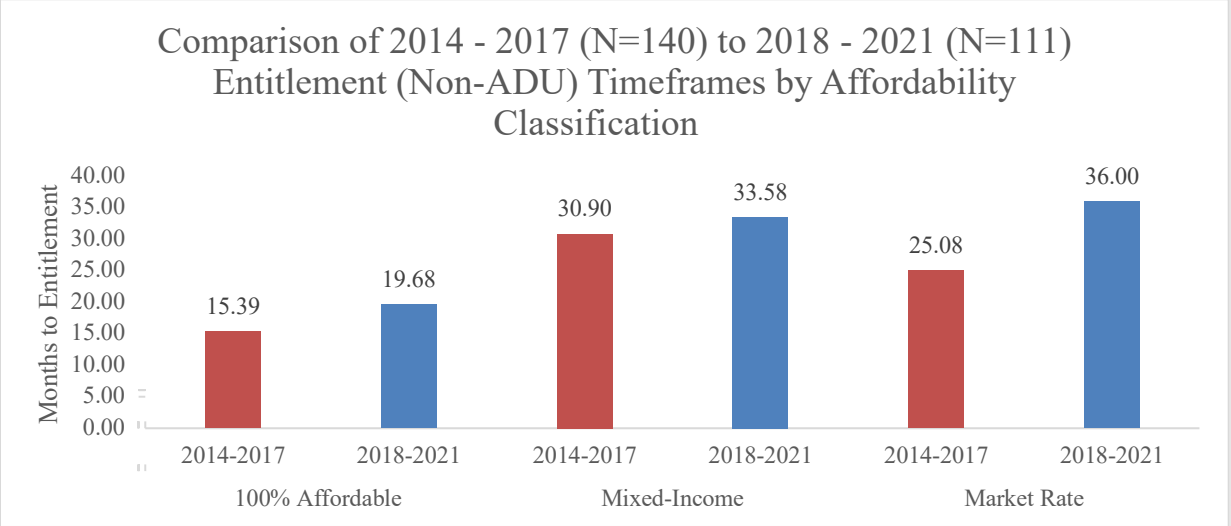
All permits in San Francisco are discretionary under local law unless preempted by state law[13] (like SB 35). Stakeholders describe the discretionary housing approval process in San Francisco as risky and unpredictable. Stakeholders report approval is uncertain even if the proposal conforms to all zoning and planning requirements. When we use different statistical methods to analyze the housing approval data, we also find that **no type of housing development is easy to entitle in San Francisco**. Even a smaller development that conforms to zoning and planning requirements faces unpredictable timeframes. When we analyze the approvals data to explore relationships between specific approval requirements and timeframes, we discover that there are factors—like affordability classification, project size, and location—outside of what zoning and planning standards require that influence timeframes. This suggests that these other factors might play a substantial role in whether and how a project gets entitled, even when a project conforms to all planning standards and zoning.

## Timeframes for discretionary approvals increased.

Our 2018 - 2021 approvals data indicates that entitlement timeframes have increased as compared to the prior four years. The median timeframe for discretionary approvals of five or more units issued in 2014 - 2017 was 27 months. In 2018 - 2021, the median timeframe for the same climbed to 34 months—more than a 25% increase. Figure 2 shows that in both study periods, 100% affordable development moved comparatively faster: 100% affordable development requiring discretionary review had median approval timeframes of ~15 months in 2014 - 2017 and ~20 months in 2018 – 2021. Both periods show that the city can quicken the process, to some degree, for affordable development. Interview data from 2017 and 2022 - 2023 indicate that planning staff have been committed to expediting affordable development.

[13] The Municipal Business and Tax Regulations Code Section 26(a) provides that San Francisco's departments may "take into consideration the effects of the proposed business or calling upon surrounding property and upon its residents . . . [and to] exercise its [or their] sound discretion as to whether said permit should be granted, transferred, denied or revoked." SAN FRANCISCO, CAL., BUS. & TAX REGS. CODE § 26(a) (2019). San Francisco Planning's website states that the city interprets this part of the Municipal Code as granting the Planning Commission discretionary authority over all building permits, including permits not otherwise discretionary under zoning and planning requirements. *Discretionary Review*, S.F. PLAN., https://sfplanning.org/resource/discretionary-review (Jan. 25, 2023).

*Figure 2: Comparison of Timeframes by Affordability Classification, All Years*




Graphic Developed by Dori Ganetsos using CALES data.

## Local policy and practices are inconsistent with the goals of the Permit Streamlining Act, Housing Accountability Act, and Housing Crisis Act.

Stakeholders report that San Francisco's local rules and politics create planning practices that are inconsistent with state housing laws which aim to quicken planning review and reduce subjectivity. Approvals data suggests these stakeholders are correct.

**First, the data the city makes publicly available on project applications shows San Francisco systematically failed to meet PSA notification deadlines for discretionary approvals issued in 2018 - 2021**. Planning recorded more information on application notices in its public portal for applications filed after January 1, 2018, as compared to prior years, indicating that San Francisco Planning is doing more to track and disclose project intake. Still, the city's data shows the city routinely did not meet PSA deadlines. Also, up until July 2023, local policy required the entitlement process for most dense development to begin with a mandatory Preliminary Project Assessment (PPA) process that added, on average, a year to the application process.

**Second, local rules drive the city's implementation of the California Environmental Quality Act (CEQA), which extends timelines**. Local rules that allow for easy administrative appeals and require appeal of CEQA determinations to follow entitlement[14] push environmental planners to make CEQA determinations at the close of the entitlement process. This practice limits the PSA's effect on overall approval timeframes.[15] Also, the state's CEQA guidelines do not require San Francisco Planning to incorporate wind and shadow studies into compliance pathways for exempt developments, but local law does. These supplemental studies add time

[14] The Board of Supervisors provides an advisory that explains that Section 31.16 of its Administrative Code requires that the Board will hear an appeal after the final approval action. *See* S.F. BD. OF SUPERVISORS, APPEAL FILING TO THE BOARD OF SUPERVISORS CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) EXEMPTION DETERMINATIONS APPEAL (Aug. 28, 2023), https://sfbos.org/sites/default/files/CEQA_Exemption_Determinations_Appeal_Info_Sheet.pdf.

[15] We interpret California Government Code § 65690(a) as imposing limits on the time to approval under the PSA only after a city makes CEQA determinations. *See* CAL. GOV'T CODE § 65690(a) (West 2023).

and cost to environmental review, and sometimes provide a basis for local administrative appeals.[16]

**Third, and relatedly, administrative appeals not only delay entitlement for specific projects that face appeal, administrative appeals also influence planning practices at a systems level.** Most stakeholders (across groups) perceive that San Francisco's process risks inserting the Board of Supervisors into any approval pathway through an appeal. This process nurtures risk averse planning practices at all stages which derail other local and state policy that aims to quicken review. Data also shows that appeals increase the workload for planners already juggling immense workloads, which in turn impacts the pace of review for other development proposals. For example, **an administrative appeal of just one entitlement in our dataset required 374 additional staff hours and $52,204 to prepare the appeal—even though the appeal was withdrawn**. Notably, nearly all the planners we interviewed or met with are more apprehensive of the Board of Supervisors than potential litigants.

**Fourth, stakeholders report frequent continuances and multiple hearings for non-CEQA approvals, which they say also allows for changes to proposed development outside of formal hearings.** San Francisco's publicly accessible data on hearing dates is incomplete for about half of our 2018 – 2021 observations. Still, we found that at least 22% of all 2018 – 2021 quasi-adjudicative entitlements had multiple continuances or hearings for a single step.[17] Some observations have remarkably high rates of continuances and hearings. One project, for example, had nine continuances for a joined Large Project Authorization and Density Bonus approval step.

**Fifth, several stakeholder groups report that local policy allows frivolous and meritless challenges with ease (evidenced by withdrawn or denied appeals or withdrawn or denied requests for exceptional discretionary review)[18] and with little to no cost to project opponents, yet significant costs to planning staff and developers**. Project proponents see increased costs because of the delays and uncertainty that these processes create. The processes also impact the workflow of Planning Department staff, which slows down planning review. For example, data shows that when project opponents request exceptional discretionary review, planners can expect to work several days and sometimes weeks preparing for a hearing on a project with which they already completed review. This requires shuffling work priorities. Developers report that rules that make it easy to challenge imminent planning approvals foster an opaque practice of negotiation outside of formal hearings which risks imposition of subjective conditions of approval. The approvals data show at least 14% of entitlements (across both study periods—or eight years) faced administrative appeals that were usually withdrawn or denied.[19]

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[16] We note here that San Francisco's public portal only provides access to shadow studies, although many stakeholders including planners stated that wind studies are common.

[17] This includes entitlements that only required a planning department or zoning administrator review. If we take out those entitlements that did not require a hearing in front of the Planning Commission or Board of Supervisors under planning and zoning law, the rate is at least 30%.

[18] Exceptional discretionary review refers to a local rule that allows project opponents to request the Planning Commission exercise discretionary review for an approval that did not otherwise require the Planning Commission's involvement. This request necessitates a hearing, at which time the Planning Commission then determines if it will exercise discretionary review because of exceptional and extraordinary circumstances which could lead to modifying the conditions of approval. More detail on this local process is in the full report. We refer to this as "exceptional discretionary review" hereafter.

[19] Administrative appeal data for 2018 - 2021 depends on internal tracking and self-reported data and is not systematically available on the city's public portal. It is possible that the rate of administrative appeal could be higher.

Also, at least 20% of discretionary building permits in study years received a request for exceptional discretionary review.

## Subjectivity and variability persist in the post-entitlement process.

All stakeholders experienced with development in San Francisco shared that the permitting process lacks standardization or uniformity in how the process unfolds. Outcomes, in terms of processing time, are contingent on who is assigned to the development rather than on the form of the development. This variability slows, and sometimes derails, production. Stakeholders describe building permit processes as inefficient and subjective, triggering planning review again even after entitlement. There is also notable difference in the way all stakeholders describe Planning Department and Department of Building Inspection (DBI) staff. Stakeholders blame local approval bodies for overly cautious planning practices. In contrast, stakeholders complain of too little oversight or management of DBI staff, and too few performance standards, as influencing permitting practices.

## Stakeholders suggest local reforms must eliminate discretionary review on some housing or the city will not meet its RHNA or resolve long-standing inequities in land use.

Importantly, planners, developers, and many housing advocates welcomed the state's intervention into local discretion through SB 35. Though planners expressed a need for more technical support from the state when state law augments local planning review, planners agreed with developers that the state ministerial process fixed planning review for most 100% affordable development and offered that a ministerial process could do the same for other housing projects.

Stakeholder groups also shared that reforms to expedite and simplify planning review while retaining discretion will fail to fix process problems in San Francisco. Statistical analysis of approvals data suggests these stakeholders are correct. Planning review of code compliant development can take years. This is true, even though our timeline calculations do not capture the frequency of developments subject to discretionary review being punted back to Planning *after* entitlement for further additional review, because San Francisco's public data portal does not allow for systematic analysis of this problem. Regression analysis suggests that reducing process steps while maintaining discretionary review is unlikely to resolve San Francisco's production challenges.[20]

**Stakeholders shared that rezoning must be coupled with procedural reform that provides a local ministerial process to address production challenges *and* equity**. Planners, developers, and some housing advocates perceive current reform efforts as "tinkering" with the zoning and planning code, when what they believe is needed is procedural overhaul and equitable upzoning. Stakeholders characterize San Francisco's existing regulation as reflecting historical and current power imbalances across neighborhoods. Stakeholders caution that current density and use controls that limit housing development in more affluent neighborhoods reflect existing neighborhood power over planning and political bodies. Also, the dominance of project-level adversarial politics reflects that some communities can only access power over land use by blocking development at public hearings. When affluent neighborhoods are rezoned, stakeholders caution that neighborhood power and influence over planning and

[20] Figure 8 illustrates. For a full discussion of regression analysis using the 2014 - 2021 data, see Appendix A.

political bodies will not necessarily disappear. Without a ministerial process for at least some development, stakeholders caution that rezoning will simply catalyze more project-by-project adjudication and administrative appeals as affluent communities block more equitable distribution of dense housing development through existing process tools. If what stakeholders forecast is correct—and the data suggests that they are—then existing timelines to approval likely underestimate future approval timeframes in higher opportunity neighborhoods that the city is in the process of upzoning or proposing to upzone.

Planners, developers, and advocates share that these local rules requiring reform are values-driven. These rules reflect a widespread assumption that more process supports meaningful community engagement and sharing of power over land use which, together, help address structural inequities in the built environment. Several stakeholder groups caution that these assumptions are faulty. San Francisco's process fosters project-level political fights that result in high-risk entitlement processes without altering longstanding inequities in planning standards and zoning. Planners, in particular, share that what San Francisco needed, and still needs, is deep engagement at the policy, planning, and zoning stages to hash out what zoning and planning standards should be, as well as simplified and ministerial approval for development at the project level that serves the city's housing policy goals. Planners and developers caution that as process has gotten worse in recent years, fewer developers can navigate the risk of developing in San Francisco, and this poses major challenges to San Francisco's ability to meet its production targets. During meetings with HCD, some Commissioners and Supervisors called out this local history and the problems of process in San Francisco, seemingly aligned with the perspectives of planners, affordable developers, and housing advocates. At the same time, meetings with both Commissioners and Supervisors also revealed clear disagreement within political bodies on both the source of San Francisco's housing problems and the solution. At least some Supervisors are skeptical that increasing anything other than affordable housing production could tackle the city's housing challenges. Some Commissioners and Supervisors also expressed concern about how State Density Bonus Law and SB 35 alter the urban form, even as they want more affordability. And at least some Supervisors perceived affordability to be welcome citywide, whereas planners and affordable developers say that this is not true.

## Conclusion

San Francisco's planning practice and process problems spring from local law that applies discretionary review to any permit and offers repeated opportunities to challenge project approvals after an already complex and lengthy planning review process. These rules incentivize risk averse planning practices to avoid disruptions to a busy workflow and public scrutiny from political bodies. Risk averse planning practices, in turn, limit full implementation of the Permit Streamlining Act, Housing Accountability Act, Housing Crisis Act, and in some instances, State Density Bonus Law. Local rules also limit the effects of SB 35, as affordable developers face post-entitlement appeals. Still, the direct effects of state ministerial review highlight what is possible in terms of resolving San Francisco's process issues. Planners, developers, and housing advocates suggest achievement of the city's equity goals requires a local ministerial process coupled with equitable upzoning. What is also apparent, however, is that reforming zoning and entitlement will be insufficient to attain production targets. The city has major challenges with post-entitlement processes—some of which are related, again, to local rules, and some of which are related to variability and subjectivity in permitting processes, staffing, and lack of inter-agency coordination.

# Introduction

In 2016, we launched the Comprehensive Assessment of Land Use Entitlements Study (CALES) at UC Berkeley. CALES explores how communities design and apply land use law to proposals to build dense housing. We used a 2015 California Legislative Analyst's Office report that identified the metro areas with the highest housing costs in the state and where demand has outpaced supply[21] to select our first group of study cities and regions. San Francisco was at the top of the list, and we began our work by studying San Francisco and four neighboring cities.[22] We eventually grew the study to include 28 jurisdictions in seven metropolitan regions across the state.

What we found was that San Francisco zoned comparatively more land for dense housing than nearly every other city we studied across the state. Indeed, San Francisco was one of only *two* cities studied that zoned more than a third of its zoned land for all income levels.[23] Zoning land for dense multi-family housing is a necessary though insufficient condition to achieving affordability and inclusion. California's fair share housing law is premised on this concept.[24]

Despite San Francisco zoning more land for dense housing than most cities studied, we found that San Francisco's local regulatory regime was comparatively prohibitive and risked exclusion. Even though the city has explicit local policy to promote inclusion and fair housing goals through inclusionary housing programs, rent stabilization, and tenant protections, our comparative analysis categorized San Francisco as "prohibitive" due to its complex procedural maze and application of laws. Among the 28 jurisdictions studied, San Francisco was unique in that it made all development discretionary. No other city we studied made all building permits (typically issued post-entitlement) discretionary; most used aesthetic regulation or design or site plan review as the blanket discretionary hook during entitlement. A few of our study cities required use permits for all multi-family housing development. But all the other approaches we found existed in the planning code and zoning regulations. No other city studied made building permits discretionary through some other area of local law.

San Francisco was also an extreme outlier in terms of timeframes to entitlement—with median timeframes of over two years, even for housing developments that met all zoning requirements and planning standards. These lengthy timeframes eclipsed the other study cities' timeframes by many months. These timelines also exceeded planner perceptions of "average" entitlement timeframes in communities nationwide. We found that only 5% of the 140 project observations in our 2014 - 2017 dataset from San Francisco achieved entitlement in 12 months or less.

We wrote that San Francisco's land use regime exemplifies how cities can zone land for dense multi-family housing and write and implement procedural rules to create delay and uncertainty of approval. Delay creates cost. Uncertainty creates risk. Increased development costs and risk influences which developers will build within a place, and what those developers will build. In that prior research, interview data and 2014 - 2017 approvals data suggested San Francisco's local regulatory regime burdened affordable development—even if the city prioritized affordable

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[21] CHAS ALAMO ET AL., LEGIS. ANALYST'S OFF., CALIFORNIA'S HIGH HOUSING COSTS: CAUSES AND CONSEQUENCES (2015), https://lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.aspx.
[22] We refer here to our Report to the California Air Resources Board in fulfillment of Contract #3900-19STC005. MOIRA O'NEILL-HUTSON ET AL., EXAMINING ENTITLEMENT IN CALIFORNIA TO INFORM POLICY AND PROCESS: ADVANCING SOCIAL EQUITY IN HOUSING DEVELOPMENT PATTERNS (2022).
[23] *Id.*
[24] *See* CAL. GOV'T CODE § 65583.2 (West 2023).

development—and likely squeezed out possibilities for middle income housing development entirely. We found that San Francisco's local law facilitated most 2014 - 2017 entitlement being sited in formerly industrial locations or neighborhoods that had multi-family zoning in place for decades. What we concluded was that San Francisco was the most sophisticated of the cities we studied in how its local law effectively blocked dense housing development through complex procedural hurdles rather than traditional density and use constraints.

California's legislature has passed nearly 100 laws relevant to housing policy since 2016[25] to spur housing production across all income levels and promote equitable housing outcomes. Many important changes target subjectivity in planning review and aim to quicken planning review, particularly for multi-family housing. There is also new law and policy to accelerate equitable housing outcomes, in terms of increased production in high opportunity locations.

More recent legislative reforms invite important questions about how well San Francisco has implemented these state housing laws intended to promote housing production, affordability, and equity. To explore these questions, we expanded and extended our Comprehensive Assessment of Land Use Entitlements Study (CALES) to better understand San Francisco's local land use regulatory regime and identify roadblocks to all multi-family housing development approvals that would yield five or more units. This report details our methods, presents findings, and discusses their implications for the California Department of Housing and Community Developments' (HCD) Policy and Practice Review.

# Methods, Data, and Limitations

HCD asked:

1) At the local level, are state housing laws (including the Housing Accountability Act, Housing Crisis Act, Permit Streamlining Act, State Density Bonus Law, SB 35, and Housing Element Law) intended to promote housing production and affordability being fully implemented, and are they achieving their intended effect?
2) What are the causes of delay in San Francisco's entitlement process?
3) To what extent do discretionary review processes impact overall project timelines and the housing approvals pipeline?

## Overall Research Approach

We use a spiraling mixed methods research design that joins legal research and qualitative, quantitative, and spatial analyses to understand San Francisco's local regulatory environment and answer the research questions. A spiraling research design is iterative and allows us to reexamine theoretical assumptions and methodological choices throughout the research process. This iterative research approach is sensitive to local conditions and research needs that are sometimes difficult to discover at the beginning of a research process. This approach involves producing analysis at multiple points in the study to allow for a feedback loop with both HCD and San Francisco while also informing our own theoretical assumptions about which law, policy, or planning practice factors support or obstruct housing development. This approach also means we do not rely exclusively on qualitative, quantitative, or spatial analysis to answer any

[25] *See* Ben Metcalf, Managing Dir., UC Berkeley, Terner Ctr. for Hous. Innovation, Presentation at the California Joint Oversight Hearing with Assembly Housing and Community Development Committee: Housing Production: Recent Legislative Actions and Outcomes (Feb. 28, 2023), https://shou.senate.ca.gov/node/21.

research question. We use qualitative data (interviews) to understand our quantitative and spatial analysis (using our entitlement dataset) and vice versa.

### Ongoing Legal Research

We completed initial legal research into San Francisco's planning and zoning through CALES in 2016. We updated that legal research in 2018 and 2019, and then again in 2021 to understand changes to local planning review processes (for example, the elimination of the pre-application Environmental Evaluation process in 2018) and the impact of state housing laws (including changes to Density Bonus Law, Accessory Dwelling Unit Law, Senate Bill 330, SB 35, and amendments to the Housing Accountability Act), wherever changes are codified or provided for in policy documents. The legal and planning code summary informs our interview questions and guides our current data collection process. In the scope of this work, we updated our review of local law with relevant trial court and appellate court opinions.

### Our Interpretation of State Law and Definition of "Full Implementation" of State Law

Answering the first research question requires us to explore whether San Francisco's policy and practices comply with state law and whether San Francisco's local policy or practices prevent specific state laws from achieving their intended effect. This requires us, first, to interpret state law and define what it means for a locality to fully implement each law for the purposes of this research. How we define "full implementation" in the research questions also informs our methods of analysis. We list our understanding of the applicability of specific state laws, their aims, and our definition of "full implementation" here.

We interpret the PSA, Housing Accountability Act, and Housing Crisis Act as applicable to *all* discretionary approvals, or entitlements, in San Francisco that do not require local legislative action. We read provisions within San Francisco's Planning Code that allow for and anticipate that the Planning Commission will issue a waiver or exception from any planning standards or zoning *without* local legislative action as adjudicative and within the purview of these state laws.

We interpret the goal of the PSA as seeking to "expedite decisions" on qualifying development projects[26] by imposing time limits on application processing and approval decisions. We also interpret the Permit Streamlining Act as imposing limits on the time to approval under the Permit Streamlining Act only after a city makes CEQA determinations.[27] If our data shows that a local policy or practice prevents the Permit Streamlining from imposing those time limits, we conclude that the local policy or practice blocks the full implementation of the PSA, even if the data does not show San Francisco violated an express provision of the PSA.

We interpret that the goal of the Housing Accountability Act is to increase housing production by limiting the ability of cities to outright deny, reduce the density of, or render infeasible a development that complies with objective development standards. We interpret the Housing Accountability Act to prohibit these actions unless a locality provides written findings that the proposed development would have an unavoidable and impossible to mitigate adverse impact on public health or safety.[28] Relatedly, we interpret the 2017 amendments to the Housing Accountability Act, found in Assembly Bill 1515, as modifying the Housing Accountability Act's "reasonable person" standard for determining compliance with land use regulations[29] in favor of

[26] CAL. GOV'T CODE § 65921 (West 2023).
[27] CAL. GOV'T CODE § 65950 (West 2023).
[28] CAL. GOV'T CODE § 65589.5 (West 2023).
[29] CAL. GOV'T CODE § 65589.5(f)(4) (West 2023).

approving qualifying development. We read the law consistent with how the First District Court of Appeal read the law.[30] We also interpret the "deemed to comply" provision of the Housing Accountability Act consistent with this same appellate court opinion.[31] We interpret this state law as requiring a city to send a project applicant timely written notice and an explanation of non-compliance if a city determines a proposed housing development is inconsistent with applicable standards.

We use descriptive statistics and interviews to explore whether San Francisco may have imposed conditions that lead to a reduced density (between application and entitlement), or subjective standards (conditions that render the development infeasible), or otherwise effectively denied a proposal to develop housing that a reasonable person would conclude is compliant with land use regulations under the Housing Accountability Act. Where our data indicates that the city may have imposed subjective standards, conditions that reduce density, or conditions that may render developments infeasible, we describe this as a failure to fully implement the Housing Accountability Act. We do *not* conclude whether San Francisco violated an express provision the Housing Accountability Act because of the limitations of our data. We gather and analyze documents that are readily available through the city's parcel information map public portal—but we cannot confirm that the city did not issue a notice of non-compliance with applicable standards *or* did not prepare findings, because the documents are not readily available on the public portal. We cannot interpret the absence of those documents on the city's public portal as meaning that those documents do not exist, ergo, San Francisco did not comply with state law.[32]

We also interpret one goal of the Housing Crisis Act of 2019, enacted in October 2019,[33] to be to curb delays associated with hearings, continuances, and meetings.[34] Where we identify entitlements with multiple hearings and more than five hearings, we describe as inconsistent with this law or that the city is not fully implementing the law. We do not determine whether the city is systematically violating the express prohibition on number of hearings, largely because of the data challenges surrounding hearings as discussed in the body of this report.

### Unique Entitlement Dataset

The Comprehensive Assessment of Land Use Entitlements Study (CALES) dataset is a uniquely detailed dataset on how entitlements issued in select years navigated their approval pathway. Table 2: Entitlement Data Counts by Project and Units Across Years details observations per study year.

[30] We refer here to the opinion in Cal. Renters Legal Advoc. & Educ. Fund v. City of San Mateo, 68 Cal. App. 5th 820, 845 (2021) ("Subdivision (f)(4) is intentionally deferential to housing development.").
[31] *Id.* at 831 (a "project is deemed to comply if 'substantial evidence . . . would allow a reasonable person to conclude' that it does").
[32] We do recommend, however, that San Francisco make those documents publicly available if they exist.
[33] We refer here to the passage of Senate Bill 330, approved by the Governor on October 9, 2019. S.B. 330, 2019-2020 Leg., Reg. Sess. (Cal. 2019).
[34] CAL. GOV'T CODE § 65905.5 (West 2023).

*Table 2: Entitlement Data Counts by Project and Units Across Years*

| | 2014 | 2015 | 2016 | 2017 | 2018 | 2019* | 2020 | 2021 |
|---|---|---|---|---|---|---|---|---|
| Projects | 24 | 23 | 55 | 38 | 36 | 42 | 25 | 41 |
| Units | 2,470 | 2,069 | 6,371 | 3,359 | 2,824 | 2,807 | 2,839 | 2,869 |

*We included one SB 35 observation without an eligibility determination date in 2019 based on the date of the building permit.

### 2014 - 2017 Observations

The 2014 - 2017 dataset does not include Accessory Dwelling Unit (ADU) approvals but does include litigation-related data.[35] We do not rely on San Francisco's reporting on entitlement and permitting. Rather, we build our dataset from source documents including application documents, planning staff reports, motion and resolution documents, and legal pleadings where relevant, and construct our own code book. Importantly, in addition to our typical quality control measures, San Francisco uniquely provided us an opportunity to review our 2014 - 2017 dataset with the San Francisco Planning Department's Environmental Review team in 2018 following our first working paper.

Using San Francisco's online Property Information Map system (PIM), we augmented the 2014 - 2017 entitlement data in this study by:

1) Collecting additional hearing, correspondence, and approval data on the PPA and Environmental Evaluation Application processes, where available;
2) Collecting in-depth information on the nine observations where parties applied for exceptional Discretionary Review (DR) under San Francisco's Business and Tax Code, including all available data on the requests, hearings, and the Planning Commission's actions;
3) Confirming if and how market-rate developments satisfied San Francisco's inclusionary zoning (IZ) ordinance by reviewing our data and supporting documents (there are 10 market-rate developments in our dataset where we cannot confirm how the projects satisfied the IZ requirement);
4) Supplementing our search for "determined to be complete" dates issued by the Planning Department (there are none for all 140 observations) with a second search through San Francisco's Property Information Map (PIM)[36] for correspondence regarding incomplete applications; and
5) Augmenting existing CEQA-related coding with any available data on Wind, Shadow, and Transportation Demand Management studies for each observation in the 2014 - 2017 dataset.

[35] We detail how we collected and quality checked the 2014 - 2017 entitlement data we reference in the Report to the California Air Resources Board (CARB Report). MOIRA O'NEILL-HUTSON ET AL., EXAMINING ENTITLEMENT IN CALIFORNIA TO INFORM POLICY AND PROCESS: ADVANCING SOCIAL EQUITY IN HOUSING DEVELOPMENT PATTERNS 36-43 (2022).

[36] PIM refers to San Francisco's public portal that provides comprehensive access to numerous records associated with parcels. *San Francisco Property Information Map*, S.F. PLAN., https://sfplanninggis.org/pim/ (last visited Sept. 18, 2023).

The Permit Streamlining Act provides planning departments should determine whether an application to develop housing is complete within 30 days of receipt or the application will be deemed complete.[37] We found no publicly available data that documents that San Francisco's planners made completeness determinations within 30 days of application for any entitlement of five or more units issued in 2014 - 2017. [38]

We explored the data to see if we could determine "deemed complete" dates as well. For discretionary building permit applications, we could almost always locate the Preliminary Project Assessment (PPA) applications (where applicable) but could not always find Project Applications consistently logged. The Notice of Building Permit Application, however, references the application date (though we cannot confirm the date against a source document). For other approval applications that require only one local approval—like a Conditional Use Authorization (CUA)—we can locate the PPA documents, but we can only sometimes locate applications for those discrete approvals with date stamps of application receipt by the Planning Department.

We also cannot determine from the documents on PIM when planning review began for entitlements issued in 2014 - 2017. For projects that fall under the Permit Streamlining Act, this means that it is not possible to confirm compliance with the Permit Streamlining Act even if the Planning Department staff did not make completeness determinations. For example, we found a few instances of Planning Department correspondence that lists what an application for a discretionary approval (like a CUA) is missing, and states that review has begun and that time limits do not begin until after the project proponent submits the required materials—but the letter does not provide *when* planning review began. These letters are dated many months after the application date.[39] The date of the letter suggests non-compliance with the PSA, but the language is vague. Also, although PIM links users to a portal that provides some building permit data (permit number, description, and date), there is little to no supporting documentation available.

### 2018 - 2021 Observations

We first modified the data collection template to account for important changes in state law and to track source documents closely. We have variables to identify the source of data that we used to determine the timeframe, approval, and hearing values. Adding data source variables allows us to code for whether we were able to identify an approval detail or event based on the original document (primary source) or an entry in San Francisco's portal (secondary or self-reported source). We also constructed new variables to explore:

- How many public hearings (including continuances) to which a project was subjected.
- The approval body required of a developer or property owner before issuing an approval.
- Changes to project characteristics (in terms of the number of units proposed, or types of units proposed) throughout the entitlement process.
- How developments that qualified for state ministerial approvals (such as SB 35) navigated the approval process.

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[37] CAL. GOV'T CODE § 65920 (West 2023).

[38] During our prior research in San Francisco, we did not request this information through a Public Records Act request. We did confirm in meetings with San Francisco personnel that at that time, Planning did not track the relevant information.

[39] For example, using one of our CUA observations to illustrate, we can find the application (with the submission date) and the Planning Department's notice that details what is missing, and that review is underway. The time lag between the two is about 10 months and does provide when planning review began.

Consistent with prior coding, we also always code for “other approvals” we could not anticipate from legal research and review of San Francisco’s local planning and zoning ordinances. In 2018 - 2021 data, examples include approvals like those requiring sidewalk legislation to allow a development to meet other code requirements. We also continuously add variables to augment the dataset to answer the research questions above.

We built our potential observation list to collect data from multiple sources. We referenced Annual Progress Report (APR) data to identify all reported entitlements or ADU or SB 35 approvals that would yield five or more new residential units if built. The APR listed duplicates. We cleaned for duplicates as we only wanted to examine unique projects in the APR. Once we had unique reported entitlements, we ran a match within our own 2014 - 2017 dataset. We ran a fuzzy-join text matching algorithm[40] between unique entitlements in the APR with our 2014 - 2017 dataset. We found six APR unique projects that overlapped with observations in our 2014 - 2017 data (which we had already cleaned and confirmed involved entitlements in those years). We do not include those in our 2018 - 2021 dataset.[41] We incorporated the remainder of APR entitlements into our data collection strategy. We then reviewed CEQA-related approvals in San Francisco's PIM portal and Planning Commission agendas using San Francisco’s public database of environmental review notices of determinations and exemptions.[42] We identified another group of observations (developments that appeared potentially approved in 2018 - 2021) to incorporate into our data collection strategy. Our 2018 - 2021 data includes 16 SB 35 observations and 17 discretionary ADUs. We provide more detail on the accuracy of APR data in Appendix C.

In all, a team of trained students collected data on 196 potential observations of entitlement/approvals issued in 2018 - 2021 after constructing a project list from the APR, cross-referencing environmental review determinations, and any other materials that listed out SB 35 project approvals. After preliminary data collection we determined 144 observations belonged in our study for analysis of entitlements and SB 35 approvals issued in 2018 - 2021. We excluded pending entitlements, entitlements outside of our study years, and Development Agreements associated with a major phased development where no phase or building had yet secured its final entitlement. We completed a full quality check of 133 of our 2018 - 2021 observations. The quality check process involved checking each coded value we recorded in the database twice against the source document or the PIM entry if no source document was available. Where there was an ambiguity or confusion about what the coded value should be, O’Neill reviewed the value and the source material to make a final coding decision.

We completed a partial quality check for 11 observations we gathered late in our data collection process, after referencing amended Annual Progress Reports, to allow for reliable summary statistics, including regression analysis, and all spatial analysis. We exclude these 11 observations from our analysis of frequency of continuances, changes in proposed density from

[40] A fuzzy join is a joining method that is used for merging two datasets that are not perfectly matched. The reason we ran a fuzzy join is that there may be differences in how an address was written in the APR and our original dataset. A fuzzy join allows us to match projects that may have similar but not identical addresses in the APR and the CALES dataset.
[41] We would have to first confirm with San Francisco Planning whether these six potential observations were new entitlements and not modifications before including them in our dataset.
[42] *Environmental Review Documents*, S.F. PLAN., https://sfplanning.org/environmental-review-documents (last visited Sept. 18, 2023).

application to approval, project intake processes, inclusionary housing program compliance pathway, and frequency of additional studies during environmental review.

### Primary Source Documents

Whenever possible, we relied on primary source documents; San Francisco does not make all primary source documents readily available. For example, calculating timeframes to entitlement for discretionary observations requires tracking the earliest required application date. Prior to discontinuing the PPA requirement in July 2023, San Francisco required project proponents submit a PPA for specific types of development before submitting a project application. We have 87 observations in our 2018 - 2021 dataset that would have required a PPA application. We were able to locate the signed and dated PPA application document to determine the first application date for 48 of those observations through PIM. We sourced PPA application dates for another six observations from PPA-related correspondence (including the PPA decision document). We had to rely on PIM entries for PPA dates for 22 observations because either the application itself was not dated, or there was no PPA application in the PIM portal. San Francisco's PPA process required project proponents to submit significant information about the proposed development.

Another example relates to San Francisco Planning's policy that mandates a pre-application neighborhood notification process, and a pre-application hearing called the "Pre-Application Community Outreach Process" or "Pre-Application Meeting."[43] This pre-application process requires project proponents to send notices and copies of plans to adjacent neighbors and neighborhood organizations *before* applying to develop land for any new construction or alteration that would change an existing structure by seven vertical feet or 10 horizontal feet. San Francisco Planning compiles the list of neighborhood organizations that project proponents must notify. Though PIM makes most PPAs available, PIM rarely provides source documents that furnish detail about pre-application hearings.

Also relevant, determining compliance with the Permit Streamlining Act requires tracking whether a project proponent applied for entitlement by submitting an application package to the Planning Department. While our dataset contains initial application dates for most of our 2018 - 2021 observations, we can source these dates from primary source documents—signed and dated applications—for only 58 observations. We rely on references to application dates in Plan Check Letters sent by the Planning Department and approval documents in another 29 observations. Where we do not have a primary source document, we rely on PIM entries for application dates, which is data that a San Francisco Planning Department planner entered into the PIM system directly.

In sum, more than half (56%) of the application dates in our dataset are essentially self-reported dates from Planning—and not readily verifiable with application documents. We also highlight here that in at least four instances, the PIM entry reports an application date *after* the approval event (which is available through a primary source document). In another five instances, the PIM system reports an application date that is prior to the PPA date. We assume these are errors (an application should neither follow an entitlement nor predate a preliminary application procedure) but we report out what the data shows, nonetheless. Although these potential errors do not impact descriptive findings on time frames to approval, they do limit analysis of consistency with the PSA.

[43] *Pre-Application Meeting*, S.F. PLAN., https://sfplanning.org/resource/pre-application-meeting (July 30, 2023).

### Regression Analysis

We ran several regressions to analyze existing relationships within the CALES dataset. We include all regressions, supplementary analysis, and robustness checks in a separate methods Appendix A, though the main findings are in this report. We ran regression models on 2014 - 2017 data and 2018 - 2021 data separately, and then together. We used the statsmodel Python module[44] to run all regressions in this analysis. We calculated all regression coefficients with robust standard errors (Errors of Order 3 (HC3)) in order to account for the existence of outliers and other issues within the data such as heteroskedasticity (variation in regression errors across our observations) and provide a small sample correction.[45] Note that if we did not use robust standard errors, the standard errors of our estimates would be smaller, so the standard errors and subsequent hypothesis testing are conservative.

### In-Depth Interviews and Meetings and Review of Public Hearings

We have interviews from our prior research across cities from 2017. We used transcripts from six interviews conducted in 2017 with stakeholders within San Francisco (an affordable developer, market-rate developer, city employee who managed affordable development, city planner, land use attorney, and community organization advocate) in this analysis. For this research, we also completed an additional 28 in-depth interviews with 18 additional participants that did not participate in interviews in prior years or in meetings led by HCD between late-fall 2022 and May 2023. We interviewed participants from the following groups: developers (market-rate and non-profit affordable developers); private sector professionals (architects, land use lawyers, planners); government personnel (including city planning staff); and representatives from community-based organizations (including affordable housing advocates). We identified some of these interview participants as experts within San Francisco and reached out to them to participate in an interview. Other participants reached out to us to participate in interviews as well. We advised all participants that the research would be reported to HCD, but we would protect the confidentiality of each participant consistent with our research protocols. For that reason, we do not quote any individual participant and only report on themes based on what multiple participants or entire stakeholder groups shared.

We observed another 33 meetings that HCD convened for their Policy and Practice Review with approximately 146 stakeholders, including city planning personnel, Commissioners, Supervisors, market-rate developers, affordable developers, and housing organizations. Twenty of those meetings invited one participant, and five meetings invited two to three participants. These 25 HCD-led meetings with one to three participants offered in-depth conversations, much like research interviews. Most were an hour, though a few were longer or shorter. Most meetings included participants, one member of the HCD team and O'Neill. A handful of much larger meetings (with more than three participants) included more than two HCD team members

[44] Documentation for this module can be found at STATSMODELS, statsmodels.org/stable/index.html (May 5, 2023).

[45] In regression analysis, the errors are defined by the difference between the observed values of the dependent variable (in this case, project timeframes) and values predicted by the regression specification. Accurate estimation of the uncertainty of OLS-predicted values generally depends on constant errors across observations. However, in this study, we do not assume that error is constant (homoscedasticity). For instance, model error might be larger for observations with substantially longer timeframes (i.e., where projects take two to three times longer than the median timeframe). When we use robust standard errors, we no longer assume that errors are constant across all observations, which can mitigate the impacts of this regression analysis being based on observational data. Further, we are using a small sample correction to mitigate the fact that our universe of observations is relatively small and to account for the natural clustering in timeframes that occurs at each local land use approval step.

and O'Neill, along with participants. In each of these meetings, HCD informed the participants that O'Neill would be observing and listening to the conversation for research purposes and that the research would support the state's Policy and Practice Review. About half of the meetings with Commissioners and Supervisors also included a deputy city attorney in the meeting with HCD. Stakeholders discussed planning review and post-entitlement processes in-depth.

In all, we analyzed notes from interviews and meetings with representatives from six different housing advocacy groups, over 20 planning staff and more than 60 development professionals (evenly split between affordable and market-rate development). We also heard from 14 individuals split across the executive and legislative bodies within San Francisco.

Two members of the research team performed a line-by-line reading of a subset (10%) of the interview transcripts and notes from interviews and meetings[46] to identify recurrent concepts to generate a codebook in MaxQDA. We developed codes through an inductive process—a process in which we analyzed the transcript to identify codes based on themes that the speaker emphasizes. We also generated some codes for analysis using a deductive process—a process in which we analyze the notes and transcripts for content which indicates the speaker perceives that San Francisco either violated a state law *or* believes a policy or practice blocks a state law from having its intended effect. Once we had a codebook, three members of the research team coded all transcripts using the same software. We used MaxQDA software to summarize the findings by code and used the summaries to identify cross-cutting themes. This report pulled out findings where the team reached greater than 90% agreement on coded segments. We also generated stakeholder abstracts that summarized dominant themes (including internal consensus and disagreement on key topics within stakeholder groups).

Where interview participants or meeting participants directed us to specific public hearings, we also reviewed those hearings to confirm what participants shared did occur. We only inserted quotes from public hearings or relevant media reporting into this report and did not include any direct quotes from conversations between stakeholders and either HCD or O'Neill.

### Document Analysis

Both interview and meeting participants, along with data collection, identified more than 41 proposed developments for a more detailed review process by our research team. We also located and analyzed documents associated with those 41 potential developments to explore in-depth what occurred during planning review.

### Study and Data Limitations

Regression analysis using CALES data does not establish causal relationships. We rely on qualitative data to establish causality. Interview data is limited by the fact that all study participants volunteered. Relatedly, data from individuals and groups that agreed to participate in meetings with HCD is also limited by the fact that these participants volunteered. Voluntary participation in interviews increases selection bias and limits the generalizability of findings from interviews. We increased the number of interviews to reduce bias, but that does not allow us to generalize about San Francisco's policies or practices. Interview findings, however, can help us craft questions for quantitative analysis. Interview findings can provide important insights when

[46] Some participants asked that the interview/meeting not be recorded for transcription purposes. In those instances, O'Neill took detailed notes during the conversation, and the team joined those notes with transcripts from other interviews or meetings for qualitative analysis.

combined with regression and spatial analysis that regression and spatial analysis alone cannot yield.

The advantage of our 2014 - 2017 entitlement dataset is that it is uniquely detailed. The limitation of that dataset, however, is that our original coding structure aimed for comparative analysis across cities. This means that when we coded our 2014 - 2017 observations, we collapsed some San Francisco processes into single variables to compare processes across jurisdictions. For example, Large Project Authorizations and Downtown Project Authorizations were coded together in our master dataset as "exceptions" because that was the most analogous to similar processes in other cities. That limits our ability to explore how those two distinct processes operate when we are studying San Francisco only. To address this in coding for the 2018 - 2021 data, we created two coded datasets. The 2014 - 2017 dataset has less detail than the 2018 - 2021 dataset.

Another important limitation of our entire entitlement and SB 35 approval dataset relates to what each observation represents. Each observation reflects successful entitlements or SB 35 approvals only. That means that this universe of projects that we use for quantitative and spatial analyses represents those developments that successfully navigated the entitlement process in San Francisco. This means that the observations also represent those developments that developers likely had a high enough probability of success that they were willing to pursue entitlement in the first place. We do not have data suitable for quantitative analysis on when and how the city may have denied applications for entitlement in our dataset. That was beyond the current research scope. There is also no reliable data suitable for quantitative or spatial analyses on parcels where a property owner is unwilling to apply for entitlement.

Also, we gathered insights from stakeholders through interviews regarding what occurs during entitlement and what influences whether some buildings get built. Specifically, stakeholders suggest that smaller buildings, which those stakeholders define as 20 units or less, may get entitled but become financially difficult to build post-entitlement. The stakeholders attributed this to an entitlement process that mediates conflicts with opponents in a way that may lead to a final entitlement of a project that is not financially possible to build.[47] If entitlement processes contribute to whether a proposed development is financially feasible—and in turn whether a developer will pull building permits to build—then theoretically we might see a difference in the rate of filing for building permits for buildings that are 20 units or less as compared to larger buildings (21 units or more).

We have two challenges concerning exploring this issue with quantitative methods. The first is that augmenting the entitlement data with post-entitlement permitting data is very difficult; San Francisco's building permit data is not as accessible online or as reliable as entitlement data. Also, San Francisco's local law makes it difficult to systematically identify what counts as the permit that represents the beginning of construction activity and/or intent to build the building because San Francisco has a discretionary building permit process.

[47] Relatedly, at the time of this writing, the San Francisco Chronicle reported on a study concluding that the City's Inclusionary Housing Program is rendering some development fiscally infeasible. *See* Noah Arroyo, *Affordable-Housing Quotas Imperil New S.F. Building Projects, Study Says*, S.F. CHRON. (Jan. 22, 2023), https://www.sfchronicle.com/bayarea/article/sf-affordable-housing-projects-17727101.php.

# Findings

We report findings in response to each of the questions that HCD asked, drawing on all data and methods to answer each question. Our findings sometimes rely on data from both our 2014 - 2017 and 2018 - 2021 datasets, and sometimes draw exclusively on the 2018 - 2021 dataset. We also compare four years to four years where appropriate and construct year-to-year comparisons or group years by two-year comparisons (e.g., 2014 - 2015 compared with 2018 - 2019) where appropriate.

Table 3 summarizes the total number of observations in our dataset, and the units they would yield if built, both in terms of market-rate units and affordable units. We narrowly define affordable units to refer to deed-restricted below market-rate housing units. Group housing, student housing, and single room occupancy housing are not included in any affordable housing count. Table 4 elaborates on the type of observations within our 2018 - 2021 data only.

*Table 3: Summary of Total Approvals and Unit Counts Across Study Period*

| Study Period | Total Approvals | Total Units | Affordable Units | % Affordable Units/ All Units |
|---|---|---|---|---|
| 2014 - 2017 Units from Entitlement of Developments of Five or More Units | 140 | 14,269 | 2,168 | 15% |
| 2018 - 2021 Units Approved from Approval of Developments of Five or More Units | 144 | 11,339 | 3,039 | 27% |

*Table 4: 2018-2021 Approval Observations and Units by Affordability and Process*

| Affordability Category | Project Count | Market-rate Units | Affordable Units |
|---|---|---|---|
| 100% Market-Rate Discretionary Non-ADU[1] | 55 | 4,264 | – |
| 100% Market-Rate Discretionary ADU[2] | 16 | 110 | – |
| Mixed-Income Discretionary Non-ADU | 52 | 3,473 | 873 |
| Mixed-Income Discretionary ADU | 1 | 21 | 3 |
| Mixed-Income SB 35 | 2 | 4 | 1,659 |
| 100% Affordable Discretionary Non-ADU | 4 | 4 | 210 |
| 100% Affordable SB 35 | 14 | 426 | 294 |

[1]This includes 2 Group Housing Projects and 1 Student Housing Project.

Although we elaborate on the contours of specific rules and planning practices when we discuss each finding, there are the two aspects of San Francisco's local law that dominate nearly all interviews and provide critical framing for virtually all of our findings. The first local law is one that makes all housing approvals in San Francisco discretionary. The Municipal Business and Tax Regulations Code Section 26(a) provides that San Francisco's departments may "take into consideration the effects of the proposed business or calling upon surrounding property and upon its residents . . . [and to] exercise its [or their] sound discretion as to whether said permit should be granted, transferred, denied or revoked." The city interprets this law as granting the Planning Commission discretionary authority over all building permits, including permits not otherwise discretionary under zoning and planning requirements. The Planning Commission delegates this discretionary authority to the Planning Department to review applications that meet Planning Code standards and Design Guidelines. But when disputes arise over a building permit, "concerned parties may choose to file a [request for exceptional] DR."[48] A DR effectively stops the Planning Department's approval process, sets a public hearing in front of the Planning Commission, and triggers additional planning staff analysis to prepare for the hearing.

Once a party has requested DR, unless they withdraw their request, there is always a public hearing. At the public hearing, the Planning Commission reviews materials and hears testimony and then determines whether it will "approve, disapprove or require modifications to the project."[49] The city states that the Planning Commission exercises this form of discretionary review only in exceptional circumstances when disputes between neighbors cannot be resolved through mediation.[50] The procedure, based on how it is written, indicates that the process of requesting and holding a hearing can add months to the approval timeline, even if the Planning Commission leaves the Planning Department's approval intact.

Another topic that dominated interviews is the ease with which project opponents can challenge discretionary approvals and post-entitlement permits through an administrative appeal under City Charter Section 4.106(b). The city charter provides that the Board of Appeals (an appointed political body) will hear appeals of building permits and demolition permits, unless either permit is issued after the Planning Commission authorizes a Conditional Use.[51] The Board of Supervisors hears appeals of any post-entitlement permit associated with a Conditional Use Authorization and any appeal of a CEQA decision.[52]

## San Francisco's local rules prevent full implementation of the goals and aims of state housing laws.

HCD asked whether the data shows that San Francisco is fully implementing state law, including the Housing Accountability Act, Housing Crisis Act, Permit Streamlining Act, SB 35, and State Density Bonus Law. The answer, as indicated by the data, is no. Developers, planning professionals, and most housing advocacy organizations perceive local rules as

[48] *Discretionary Review*, S.F. PLAN., https://sfplanning.org/resource/discretionary-review (Jan. 25, 2023).
[49] *Discretionary Review*, S.F. PLAN., https://sfplanning.org/resource/discretionary-review (Jan. 25, 2023).
[50] The city also elaborates on its interpretation of the power this provision affords the Planning Commission in the Application Packet for Discretionary Review. *See Discretionary Review*, S.F. PLAN., https://sfplanning.org/resource/discretionary-review (Jan. 25, 2023).
[51] The city details the limitations of the Board of Appeal's jurisdiction. *About Us, Board of Appeals*, SF.GOV, https://sf.gov/departments/board-appeals/about (last visited Sept 18, 2023).
[52] Appeal of Certain CEQA Decisions, SAN FRANCISCO, CAL., ADMIN. CODE § 31.16 (2013).

blocking the full implementation of the Housing Accountability Act, Housing Crisis Act (SB 330), Permit Streamlining Act, and State Density Bonus Law. Descriptive and inferential statistical analysis of housing approvals yields findings that are consistent with these stakeholder perceptions. Stakeholders also report that SB 35 effectively expedites planning review, but does not resolve post-entitlement problems within San Francisco.

We report findings related to SB 35 and State Density Bonus Law first, and then move through findings related to steps in the entitlement and post-entitlement process.

## San Francisco Planning fully implemented SB 35, but SB 35 is not a complete process fix.

SB 35 provides a state ministerial process for qualifying urban multifamily code compliant housing developments in jurisdictions that fail to meet their RHNA production targets in prior RHNA cycles. In San Francisco, SB 35 applies to qualifying housing where 50% or more of the units are affordable. A ministerial process is significant for developers and planners in San Francisco because local law renders all approvals discretionary. The state ministerial process eliminates pre-application requirements and hearings (discussed in more detail below), the opportunity for project opponents to request DR, and CEQA review. Once San Francisco Planning determines a project is eligible for SB 35, the developer proceeds directly to the Department of Building Inspection (DBI) for permitting.

### SB 35 processing timeframes are fast—whereas discretionary building permits typically take years.

SB 35 cabins the eligibility review period to 90 or 180 days depending on the project size (measured by units).[53] Like many other cities, San Francisco "restarts" the review clock if there are any changes to the application.[54] The data shows San Francisco Planning diligently applied this state law. We found that planning review for developments that began as SB 35 applications take about four months but no more than eight months. Table 7 shows that, in contrast, discretionary building permits take approximately two years to entitle or complete planning review before they begin to work with the DBI. Stakeholders explain that entitlement delays increase holding costs, but approval delays may also result in being subject to higher fees, particularly when delays span over years. Timeframes for all non-ADU developments along specific approval pathways spotlight the difficulty of entitlement and the need for a local ministerial process in addition to other zoning and procedural reforms.

[53] CAL. GOV'T CODE § 65913.15(c)(1)-(2) (West 2023).
[54] Moira O'Neill & Ivy Wang, *How Can Procedural Reform Support Fair Share Housing Production? Assessing the Effects of California's Senate Bill 35,* 25 CITYSCAPE 143, 143-70 (2023).

*Table 5: Entitlement Timeframe by Approval Pathway 2018-2021*

| Process Categorization | Min. Timeframe | **Median Timeframe** | Max. Timeframe | **Mean Timeframe** | Standard Deviation |
|---|---|---|---|---|---|
| SB 35 Only (no discretionary process prior) (N=9) | 0.89 | **3.42** | 7.63 | **4.29** | 2.63 |
| SB 35 Conversion (all began as discretionary) (N=7)[2] | 15.39 | **29.39** | 41.39 | **29.18** | 10.32 |
| Discretionary BP (N=17) | 7.76 | **24.20** | 47.70 | **24.07** | 8.58 |
| Discretionary BP with Exceptional DR request (N=4)[3] | 10.32 | **32.33** | 55.56 | **32.64** | 19.76 |
| Variance (by ZA) (N=11) | 19.73 | **36.00** | 69.27 | **41.40** | 19.96 |
| Variance (by ZA) with Exceptional DR (N=5) | 10.39 | **39.48** | 146.69 | **59.28** | 52.30 |
| Variance (by Planning Commission) and Exceptional DR (N=1) | 46.68 | **46.68** | 46.68 | **46.68** | — |
| DPA / LPA / SPA (N=15) | 23.31 | **35.67** | 67.03 | **38.33** | 13.59 |
| CUA Only (N=17) | 18.71 | **35.05** | 59.34 | **35.90** | 12.45 |
| CUA[4] Pplus (N=30) | 17.00 | **39.68** | 105.40 | **46.01** | 21.99 |
| PUD[5] (N=2) | 7.73 | **24.53** | 41.33 | **24.53** | 23.76 |
| Development Agreement (N=4) | 32.09 | **42.16** | 51.52 | **41.98** | 7.94 |
| Map Amendment/General Plan Amendment (N=3) | 34.49 | **42.08** | 64.90 | **47.16** | 15.83 |

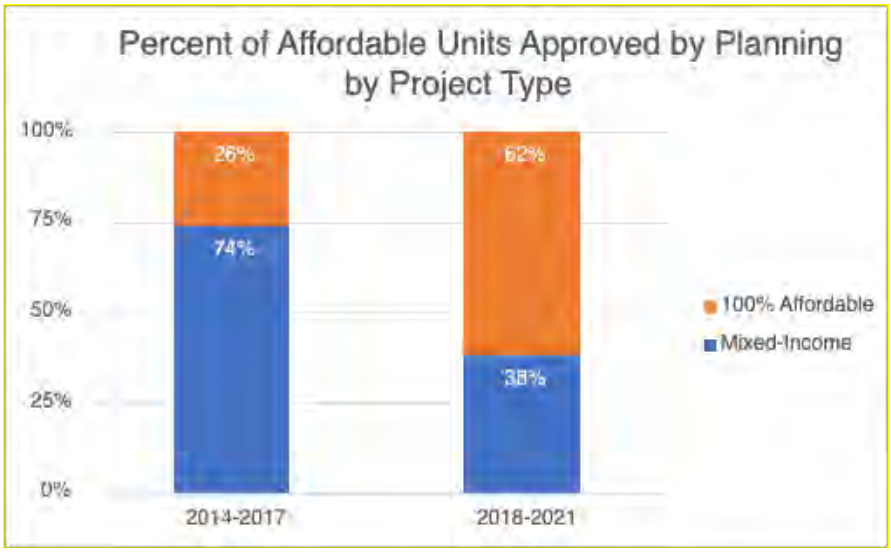
[1] We do not include two observations, discretionary building permit projects with additional administrative approvals, in this timeline calculation. One involved a discretionary building permit and an exception, and the other was a discretionary building permit with an ADU.
[2] We have one additional SB 35 project in this category that does not have an eligibility determination date. Though we know it received a building permit, we cannot include it for timeframe calculations. Each of the observations in this category proceeded through a discretionary approval process before initiating an SB 35 application. Some applications pre-date SB 35's enactment.
[3] This includes two discretionary building permits that received requests for exceptional DR and faced administrative appeals.
[4] Includes CUAs with other processes that typically go to the Zoning Administrator or Planning Commission but not the Board of Supervisors (such as CUA with a Variance, or CUA with a Certificate of Appropriateness).
[5] PUD refers to Planned Unit Development.

### Developers report that SB 35 transformed planning approval pathways for affordable development.

Developers described SB 35 as eliminating risk because the law creates certainty in entitlement where none existed before. Some planners reported a steep learning curve at the outset; they shared that major changes like this to planning review are difficult to implement at first—and that early state guidance could help planning staff improve implementation. Developers, however, described San Francisco Planning's implementation of SB 35 as efficient and helpful. The data largely confirms that San Francisco Planning made most SB 35 eligibility determinations quickly and within required timeframes. The outliers represent proposals to develop affordable housing using local discretionary processes, sometimes because the project proponent filed the application before SB 35's passage and/or effective date.

Approval data also shows that state ministerial review allowed for faster processing which facilitated the approval of nearly three times the number of 100% affordable developments in 2018 - 2021 as compared to 2014 - 2017. There were only five 100% affordable developments entitled in 2014 - 2017. In 2018 - 2021 alone, San Francisco approved eighteen 100% affordable developments, and 14 of those developments used SB 35's ministerial process. Because of SB 35, most affordable units approved in 2018 - 2021 came through ministerially approved 100% affordable developments that used State Density Bonus Law. In 2014 - 2017, 74% of affordable units came from mixed income developments. In 2018 - 2021, 62% of all affordable units came from 100% affordable developments.

*Figure 3: Distribution of Affordable Units by Development Type*




Graphic Developed by Dori Ganetsos using CALES data.

## SB 35 does not resolve post-entitlement opposition through appeals.

Affordable developers that have used SB 35 describe several post-entitlement difficulties that extend construction timelines. One difficulty affordable developers describe is that San Francisco's local rules allow project opponents to use the administrative appeals process to delay construction by challenging post-entitlement permits. (We discuss other post-entitlement difficulties below.) Construction activity impacts neighbors, who then may file complaints during the construction process.[55] But some neighborhood organizations escalate their opposition to construction by using administrative appeals to the Board of Appeals, which under local law suspends permit approvals until the appeal is resolved.[56]

2550 Irving Street exemplifies how post-entitlement challenges can delay construction of housing approved under SB 35. 2550 Irving, a 100% affordable development that would provide 90 units of supportive housing,[57] has faced at least two post-entitlement appeals of permits.[58] San Francisco Planning determined the development was SB 35 eligible on August 17, 2022. In November 2022, the Mid-Sunset Neighborhood Association appealed the demolition permit required to demolish a two-story office building because of concerns about toxins. The filing of the appeal suspended the building permit pending resolution. The Board of Appeals heard the

[55] One notable example relates to 78 Haight Street, which will house transitional-aged youth at risk of homelessness. We found three complaints from neighbors about construction logged in PIM so far. A neighborhood organization complains about inadequate notices about this development online, as well (though it characterizes the housing product incorrectly). *78 Haight*, HAYES VALLEY SAFE, https://www.hvsafe.com/78-haight/ (Mar. 17, 2022).

[56] Wherever PIM recorded an administrative appeal of a permit, we captured that in our database. San Francisco's public portal provides incomplete information about appeals and post-entitlement challenges, so we also asked interview participants to provide examples of projects that faced post-entitlement challenges. We then cross-referenced the DBI permitting system to see if we could find more information on the impact of appeals on permits.

[57] Application data indicates that at one point, this project was proposed to offer 98 units.

[58] San Francisco's public portal reports two appeals associated with the demolition permit for this development, both filed on December 5, 2022 (numbers 22-091 and 22-092). The neighborhood association also filed an appeal of the construction permit.

first appeal of the demolition permit on February 22, 2023, and denied the appeal (with a 3-2 split vote). Online records show that DBI reinstated the building permit, months after the initial approval date of October 28, 2022, on March 7, 2023. The same organization also appealed the construction site permit, originally approved on June 26, 2023. This permit was also suspended pending resolution, and on August 16, 2023, the Board of Appeals voted 2-2 on whether to grant the appeal and whether to continue the hearing. Both the appeal and the motion to continue failed as only four of five Commissioners were present. Ahead of both hearings, HCD sent Letters of Technical Assistance to the City and County of San Francisco's Board of Appeals regarding 2550 Irving, informing San Francisco that under state law, the city should not hear administrative appeals on SB 35 approvals.[59]

In related media, the neighborhood organization stated that they want more environmental remediation before construction.[60] The developer and the Mayor's Office of Housing and Community Development pointed to testing, review, and approval from public health and toxic substances agencies. The Chronicle reported that Supervisor Engardio publicly expressed support for 2550 Irving as "much needed [housing that] should not be delayed" though he also believed agencies could better communicate safety assurances to neighbors.[61] During confidential interviews, however, some stakeholders shared that they do not believe the neighborhood association is primarily concerned about environmental hazards; some stakeholders instead believe that the neighborhood opposes the development because of its size and the development's intended residents.

The agenda for the hearing on August 16, 2023, included a ~1,200-page record for this one appeal. During the hearing, Board of Appeals Commissioners disagreed about the effect of SB 35 on their power to review the permit and the appropriate scope of authority for Commissioners to exercise, generally, when deciding a matter that requires technical expertise. The Commissioner remarks during the hearing illustrate several of the ideological divides within local political bodies that stakeholders described during interviews. The public comments from Commissioners, some of which are quoted below, reveal conflicting perspectives on the normative value of state preemption of local power, the appropriate scope of administrative review of the work product from agency personnel with specific technical expertise, and the purpose and function of the Board of Appeals in general.

> Another point I wanted to make is in regard to SB 35 and SB 35 preemption. As one of the public commenters commented tonight . . . since SB 35 was passed several years ago, 2018-2019, **there has been a proliferation of new state level legislation also taking aim at local review processes**. And most have been drafted by San Francisco's own representatives in Sacramento, and those representatives in Sacramento need to know your opinions on these things **because they're doing their darndest to make sure there is no review process anymore, that the planning commission can't hear these items and they're trying to get it so that the Board of Appeals can't hear these items either, and if you believe in local review as I do as a member of this body, it's your duty and your responsibility to let your representatives**

[59] One of the letters is available online. *See* Letter from Shannan West, Hous. Accountability Unit Chief, Cal. Dep't Hous. & Cmty. Dev., to S.F. Bd. of Appeals, City & Cnty of S.F. (Feb. 22, 2022), https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/SanFrancisco-LOSTA-022223.pdf.
[60] The Chronicle reports on the challenges. *See, e.g.*, J.K. Dineen, *Judge Rules Contested Sunset District Affordable Housing Project Can Proceed*, S.F. CHRON. (Dec. 9, 2021), https://www.sfchronicle.com/sf/article/judge-rules-contested-sunset-district-affordable-16688685.php (unsuccessful attempt to secure an injunction).
[61] *Id*.

**know what's at stake here and what this means to you** [deep pause] I do think what's going on here goes far beyond the lot lines of 2550 Irving, and I don't necessarily think that even granting this appeal will fix the larger environmental hazards in the Sunset District . . . but I think there is a much bigger picture here in terms of the legal background and what is going on between several different agencies . . . .[62]

I see a distinct difference between that remediation and the permit here that we are here to pass judgment on. . . . We recognize that there is a problem . . . that problem is there is PEC contamination in the Central Sunset particularly around this site, and that needs to be remediated. . . . However, I see a distinct difference between that remediation and the permit we are here to pass judgment upon . . . . The appellant themselves admitted that the construction of this site has no bearing on the issues and levels that will be taking place in the neighborhood. So I see a very bright line between the contamination which needs to be remedied, and the permit that we are here to consider. . . . You know what, this is something that happens to us a lot in different circumstances, usually less dire, usually with a lot less scientific data that we have to parse our way through. When we end up with landlord-tenant issues, we find ourselves with a conflict . . . that needs to be worked out . . . . [I]t is probably best venued in the civil courts . . . but we look not to that issue, but we look to the permit and underlying issues within our jurisdiction . . . . **I see how SB 35 can be very confusing, it can be tedious, it can be difficult, but I have to ask myself do we have grounds under SB 35 to have grounds to appeal this, or overturn this permit, even if we identified it as being material to these issues that were here and I don't think this permit is material to the contamination thing, but even if we did, in this circumstance I don't see a way to get there because the objective standards under the Planning Code . . . are through the Maher ordinance**.[63] DPH has engaged the Maher procedures. They've gone one further for us as a neighborhood association has for them to do and brought in the DTSC because they have more expertise and more resources . . . and so that process that is supposed to take place is ongoing . . . . Let's be clear here, we get nervous sometimes as a board about playing amateur architect. **Right now we're playing scientists and we're playing amateur environmental scientists . . . . [L]et's realize it doesn't have anything to do with the permit in front of us today. I will not move to uphold the appeal**.

I so fundamentally disagree . . . . [P]eople on appeals boards make judgments on experts all the time . . . . And then we had people representing to us that there would be communication, same thing, they made it sound like there was going to be community participation, none occurred . . . . **I think there is an appropriate time to say that the experts got it wrong, or the process was wrong**. . . . I would ask that we continue this [to allow Board of Appeals President to join discussion].[64]

I am not comfortable telling the Sunset residents that they should feel safe, and that is what it really boils down to for me, it is a moral ethical issue for me, and I do and I can take that into account. . . . this body isn't the one that should be hearing this, unfortunately we don't have another body that is more appropriate to hear this . . . . [W]e're attorneys not environmental experts . . . . [T]his shouldn't be litigated in the context of permit appeals . . . . [B]ut we don't have an appropriate forum. . . . [**I]nstead what we have is the Board of Appeals, which for all intents and purposes has become a catch all in many ways and we have taken it upon ourselves in many instances to make consequential decisions and push for consequential**

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[62] *S.F. Bd. of Appeals: Hearing on Appeal No. 23-034* (Aug. 16, 2023) (statement of Alex Lamberg, Comm'r, Bd. of Appeals), emphasis added.

[63] Commissioner Eppler is referring here to San Francisco Health Code Article 22A that gives the San Francisco Department of Public Health oversight of characterization and mitigation of hazardous substances in soil, soil vapor, and groundwater in the Maher Area identified in the city's Building Code Article 106A.3.2.4.

[64] *S.F. Bd. of Appeals: Hearing on Appeal No. 23-034* (Aug. 16, 2023) (statement of John Trasviña, Comm'r, Bd. of Appeals), emphasis added.

> **change in city policy in city operations in city administration**. And to me this is the most consequential of any the issues we've dealt with since I've been on the board . . . this one takes the cake. There are people's lives at risk here. **And I don't think we should be the body who is imbued with this power, but ultimately our state legislators have ripped away the other layers of review so it can't go to the Planning Commission. It can't go to other commissions. It's here, and we ultimately have de novo review of this, potentially with SB 35 limitations, but you know . . . ultimately legal advice is just that – it's legal advice and we as Commissioners get to make the say.** I obviously don't think we have the votes to grant the appeal here tonight . . . but you know, if there was a time to make a leap of faith, this was the time.[65]

## More developments relied on State Density Bonus Law as compared with prior years, but stakeholders disagree about how easy it is to use the state law.

State Density Bonus law allows for developers building residential or mixed-use projects with five or more units to build more housing units than zoning would otherwise allow in exchange for a prescribed number of below-market-rate units. The law provides bonuses in the form of additional density and waivers of some local standards. State Density Bonus Law is a state mandate and the state law may preempt local implementation programs with a bias towards "producing the maximum number of total housing units" under § 65915(r) of the Government Code. The law prohibits cities from applying development standards to a density bonus project that would make it impossible to build at the densities or with the concessions or incentives provided in State Density Bonus Law.[66] San Francisco's Planning Code Section 206 implements State Density Bonus Law and provides two local density bonus programs, the HOME-SF program[67] and the 100% Affordable Housing Bonus Program.[68]

We found that nearly all SB 35-approved developments also relied on State Density Bonus Law. State ministerial review through SB 35 and State Density Bonus Law allowed for ministerially approved 100% affordable developments that were, on average, larger (measured in units) than 100% affordable developments requiring discretionary review. The median project size (measured by units) of all SB 35 developments is 121 units. The mean is 119 units. The median project size (measured by units) of all 100% affordable non-ADU discretionary observations is 13 units. The mean is 53 units. For comparative purposes, the median project size (measured by units) of 100% affordable developments entitled in 2014 - 2017 was 134 units, and the mean was 113 units. The median project size (measured by units) of all non-ADU discretionary observations is 24 units and the mean is 799 units. The two largest developments that exceeded 800 units if built—among the outliers—required discretionary approval.

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[65] *S.F. Bd. of Appeals: Hearing on Appeal No. 23-034* (Aug. 16, 2023) (statement of Alex Lamberg, Comm'r, Bd. of Appeals), emphasis added.
[66] CAL. GOV'T CODE § 65915(e)(1) (West 2023).
[67] Housing Opportunities Mean Equity – San Francisco Program (HOME-SF), SAN FRANCISCO, CAL., PLAN. CODE § 206.3 (2019).
[68] The 100 Percent Affordable Housing Bonus Program, SAN FRANCISCO, CAL., PLAN. CODE § 206.4 (2018); *see also Affordable Housing Bonus Program (AHBP)*, S.F. PLAN., https://sfplanning.org/ahbp#:~:text=State%20Density%20Bonus%20Law,-In%201979%2C%20the&text=Ten%20percent%20of%20total%20housing,age%20requirements%20for%20older%20persons (last visited Sept. 18, 2023).

*Table 6: Median Project Size by Product Type and Approval Pathway*

| Type | Median Project Size Units | Mean Project Size Units (rounded) | Standard Deviation Project Size Units (rounded) |
|---|---|---|---|
| 100% Market-Rate, Discretionary Non-ADU[1] (N=55) | 9 | 78 | 193 |
| 100% Market-Rate, Discretionary ADU (N=16) | 6 | 7 | 3 |
| Mixed-Income, Discretionary Non-ADU (N=52) | 47 | 84 | 104 |
| Mixed-Income, Discretionary ADU (N=1) | 24 | 24 | — |
| **Mixed-Income, SB 35 (N=2)** | **360** | **360** | **127** |
| 100% Affordable, Discretionary Non-ADU (N=4) | 13 | 53 | 83 |
| **100% Affordable, SB 35 (N=14)** | **121** | **119** | **59** |

[1] This grouping includes two Group Housing Projects and one Student Housing Project.

Thirty-one developments in our 2018 - 2021 dataset used State Density Bonus Law to increase the number of allowable units, and another six developments used the local HOME-SF program (all entitled in 2021). We see a notable increase in projects using density bonus programs in 2021, overall. In total, developments that secured approvals in 2018-2021 relied on density bonus programs more often than the developments entitled in 2014-2017 as well. Only four developments entitled in 2014 - 2017 used any density bonus program.

Also important is that developers used State Density Bonus Law more often than the HOME-SF program. Fifteen SB 35 ministerially approved developments in our 2018 - 2021 dataset all used State Density Bonus Law. The remaining developments that used State Density Bonus Law were discretionary mixed-income developments. At least 13 of the mixed-income developments used State Density Bonus to help meet requirements under the local Inclusionary Housing Program requirements. Five mixed income developments used Home-SF to meet requirements under the local Inclusionary Housing Program requirements as well.

### There was no consensus among developers about how easily developers could use State Density Bonus Law in San Francisco.

Some developers expressed that the waivers both help create an appealing and efficient development and increase the likelihood of entitlement, overall. Some developers shared that the city's local rules and guidelines do not apply state law correctly[69] and/or that the city steered them away from using State Density Bonus Law. Developers also reported that the city applies the law so as to increase inclusionary program fee requirements once development size increases. Planners shared that design review can interfere with application of State Density Bonus Law, as political bodies may request reduced heights or removal of floors to projects that qualify for density bonuses. Affordable developers shared their frustrations concerning how planners have to do substantial work to apply different density bonus programs to help 100% affordable housing developments benefit from SB 35 while also securing required waivers. Planners also commented that State Density Bonus Law is complex, and that they (planners) would really benefit from more state guidance on its application. But planners and affordable developers emphasized that ministerial review and State Density Bonus Law were, together, critical to creating opportunities for more affordable housing within San Francisco.

### Both developers and planners shared that State Density Bonus Law has been critical to helping developers manage requirements under local rules.

Developers shared that State Density Bonus Law was critical to make development financially feasible. Planners also shared that developers use State Density Bonus Law to facilitate large projects that the Planning Commission might otherwise deny. Planners explained that the city's Large Project Authorization (LPA)—theoretically meant to allow for larger projects and for modifications and waivers—does easily support larger development. Planners perceive that when developers use the modifications and waivers under the LPA, the Planning Commission interprets the project as no longer compliant and covered by the Housing Accountability Act, allowing political bodies to deny approval. Planners report that developers therefore use State Density Bonus Law to make large projects work while also staying covered by the Housing Accountability Act.

One development, outside of our study years, that stakeholders discussed during interviews as illustrative of this issue was **1010 Mission Street**. Planners reported that the developer first sought an LPA for a group housing development which the Planning Commission did not like and denied. The developer then used State Density Bonus Law to get an approval. Cross referencing documents, we found that the developer requested an LPA that was later withdrawn. The developer secured a final entitlement with an Individually Requested State Density Bonus approval and Downtown Project Authorization.

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[69] Section 206.6 of San Francisco's Planning Code may require revision after the passage of AB 1763, which provides an 80% density bonus, four incentives or concessions, and special parking ratios for 100% affordable housing projects, and AB 2345, which increased the maximum range of the density bonus to 50% for housing projects with 15% very low-income units, 24% lower income units, or 44% moderate income units. *See* CAL. GOV'T CODE §§ 65915(f)(1), (f)(2), (f)(4). AB 2345 also lowers the required percentage of lower income units required to obtain multiple incentives and concessions under § 65915(d)(2). Table 206.6B seems inconsistent with those provisions under state law. San Francisco Planning, however, also issues Bulletins explaining how it applies state law. *See, e.g.,* S.F. PLAN., BULL. NO. 6, IMPLEMENTING THE STATE DENSITY BONUS PROGRAM (Feb. 2023), https://sfplanning.org/sites/default/files/documents/publications/DB_06_Implementing_State_Density.pdf.

Planners also stated that State Density Bonus law is critical to promoting productive dialogue about how to make proposed developments better, because once it becomes clear that the city cannot deny the project (and only after it is clear the city cannot deny the project), the public discourse shifts towards how to improve the design to be sensitive to neighborhood needs. Participants offered **321 Florida Street**, a mixed-used mixed-income development entitled in 2021 that required an LPA but also used State Density Bonus Law, as an example of a how state law helped secure entitlement rather than a project denial. After it was clear the city could not deny the development, planners also reported that the conversation with the community focused on how to improve the design in a manner that did, in fact, improve the aesthetics of the proposed development. Another example participants provided was **1560 Folsom Street**, another large mixed-use mixed-income development entitled in 2021 that required an LPA but also used State Density Bonus Law. The outcome for 1560 Folsom allowed for special sidewalk placards to celebrate the area's local history.

Planners note, however, that State Density Bonus Law, while critical to increasing certainty of entitlement for larger developments, may not produce more efficient and speedy deliberative processes during entitlement. Consistent with this perception, our data shows that the only approvals under State Density Bonus Law that planning department staff issued were those approvals associated with SB 35 projects. All other requests for density bonuses for discretionary projects required approval from San Francisco's Planning Commission. Relatedly, we found some observations with multiple continuances for hearings for joint LPA and State Density Bonus Law approvals, as well.

Our data also shows that while an LPA coupled with a State Density Bonus Law approval may secure approval from the Planning Commission, the approval is still vulnerable to being overturned by the Board of Supervisors if the community perceives the final entitlement outcome to be contrary to neighborhood needs. **2300 Harrison Street** illustrates this issue. This proposed mixed-use building would have added three stories to an existing three-story commercial building and demolished an adjacent parking lot. The development would add ~27,000 square feet of office and retail space on a site occupied by Lyft, along with 24 units of housing, of which three would be deed-restricted affordable. After the Planning Commission approved the development, community organizations appealed the Community Plan Exception under CEQA to the Board of Supervisors. The Board of Supervisors unanimously upheld the appeal. A community group publicly stated that the entitled development represented an exploitation of State Density Bonus Law.[70]

[70] Media reported that the new development would result in ~95,000 square feet of retail/commercial space. We reviewed the project proposal documents, and those documents indicate the proposed development would *add* approximately ~27,000 square feet of commercial space, and 24 units of housing, *to an existing* building that had ~68,000 square feet of office space. *See* Laura Waxmann, *S.F. Supervisors Take United Stance Against Mission Development at Former Lyft Offices*, S.F. BUS. TIMES (Aug 19, 2020), https://www.bizjournals.com/sanfrancisco/news/2020/08/19/sf-supervisors-vote-down-mission-district-office.html.

*Table 7: Frequency of Use of Density Bonus (All Programs)[1]*

| Year (N=Total Approvals/Per Year) | N Density Bonus Used | | N State Density Bonus used |
|---|---|---|---|
| 2014 (N=24) | 0 | | - |
| 2015 (N=23) | 0 | | - |
| 2016 (N=55) | 1 | | Unknown |
| 2017 (N=38) | 3 | | Unknown |
| 2018 (N=33) | SB 35: 3 | Other: 3 | 5 |
| 2019 (N=34) | SB 35: 3 | Other: 2 | 5 |
| 2020 (N=25) | SB 35: 5 | Other: 2 | 7 |
| 2021 (N=41) | SB 35: 4 | Other: 15 | 16 |

[1]We do not calculate which density bonus programs (state or local) 2014 - 2017 entitlements used.

Stakeholders also do not agree on whether State Density Bonus Law is good for San Francisco. Market-rate developers shared that State Density Bonus Law has been critical to increasing the feasibility of housing development while also satisfying the local inclusionary program as on-site requirements increased over time.[71] Affordable developers heavily relied on State Density Bonus Law to increase the size of 100% affordable development, which did increase the number of units approved. Some Commissioners and Supervisors also described density bonuses as critical to reaching affordable housing targets.

But some Commissioners and Supervisors expressed concern about how the city's application of State Density Bonus Law might derail community outreach or historic preservation. Some planners shared that implementing State Density Bonus Law was difficult at times and required educating political bodies on where San Francisco retained discretion and where it did not under the law (which was further complicated by San Francisco's context of all permitting being discretionary). Planners also perceived that local political bodies did not like the impact of State

[71] Section 415.3 details the thresholds. Qualifying applications initiated before January 12, 2016, had a 14.5% on-site inclusionary requirement; applications initiated after that date had variable thresholds depending on the project size and a complex scheme of alternatives. Under Section 415.6(a)(1), a development larger than 10 units but smaller than 25 that elected on-site units would have to meet a 12% threshold. Section 415.6 (a)(2) and (a)(3) provided that owner occupied developments of 25 units or more would have to meet a 20% threshold, and rentals developments larger than 25 units would have to meet a 18% threshold. Section Section 415.6(a)(5) also provided for incremental increases beginning in 2018, which would raise the thresholds even higher for developments of 10 – 24 units to 15% and larger developments would increase incrementally each year, but not to exceed 26% for owner occupied developments and 24% for rental developments. SAN FRANCISCO, CAL., PLAN. CODE §§ 415.3, 415.6 (2021).

Density Bonus Law on urban form because it limited subjectivity in design review, or its impact on inclusionary outcomes in terms of the overall yield of on-site affordable units.[72] Consistent with these planner perceptions, some Commissioners and Supervisors did express concern about state law that overrides design considerations.

## Local rules complicate application of the Housing Accountability Act.

When discussing the importance of SB 35 and State Density Bonus Law, another important theme emerged. Several stakeholder groups reported that local political bodies do not consistently follow the Housing Accountability Act and deny proposed development covered under state law. Importantly, stakeholders did not describe the Planning Commission as blatantly violating state law but explained that instead, complex local rules make it difficult to determine which local approvals are within the purview of the Housing Accountability Act and which are not. If there is any ambiguity about whether the Housing Accountability Act applies, and a proposed development is at all controversial, that ambiguity leads to a project denial.

Planners emphasized here again the importance of state guidance on how the law changes local processes. When state law does not create a ministerial process (like SB 35) but limits local discretion, state guidance provides clear communication to political bodies and the public how the state law changes local processes. That is critical, planners say, in a local context like San Francisco where at least some within the political bodies and communities interpret local rules as allowing the city to retain the power to deny an approval. If state law significantly limits the right to deny an approval, planners recommend that the state guidance be clear so as to enable staff and Commissioners to say publicly that state law dictates a particular outcome.[73]

## Local rules require entitlement processes begin before the application—and navigate multiple hurdles along the way to approval.

Prior to July 1, 2023, the process for entitlement for many multifamily non-ADU and non-SB 35 developments began with a required Preliminary Project Assessment (PPA).[74] The Mayor's Office recently eliminated this hurdle through an Executive Directive, but we explain how this impacted the observations within our dataset.

Under the PPA process, a project proponent was required to complete the PPA before they could submit their project application. San Francisco's PPA process required project proponents to submit significant information about the proposed development. We have 87 observations in our dataset that would have required a PPA application under that local policy. We can verify PPA application dates against source documents for more than half of those, but otherwise rely

[72] Commissioner Diamond on June 1, 2023, expressed concern about the impact of State Density Bonus Law on urban form when questioning whether Supervisor Melgar's proposed legislation to increase density in a west side neighborhood would, in conjunction with State Density Bonus Law, lead to nine-story buildings.

[73] It is important to note, however, that during this research, HCD sent two advisory letters to the city on the impact of SB 35 on post-entitlement administrative appeals, and the limitations that SB 35 placed on San Francisco's ability to hear post-entitlement appeals in the context of an SB 35 approval. San Francisco's Board of Appeals heard both post-entitlement administrative appeals, even though at least one of these letters explicitly stated that SB 35 did not allow for post-entitlement appeals.

[74] San Francisco Planning now provides that it no longer accepts PPAs consistent with the Mayor's Executive Directive issued on February 7, 2023, subsection II.9. OFF. OF THE MAYOR, CITY & CNTY. OF S.F., DIRECTIVE 23-01, HOUSING FOR ALL (Feb. 7, 2023), https://sf.gov/sites/default/files/2023-02/Executive%20Directive%2023-01_Housing%20for%20All.pdf.

on self-reported dates from San Francisco's system. The average time from PPA application to project application was about a year.

*Table 8: PPA to Application Timeframes*

| (months) | Median | Mean | Standard Deviation |
|---|---|---|---|
| PPA to Earliest Application Date | 4.96 | 11.71 | 21.00 |

San Francisco Planning, responding to direction from the Mayor's Office, eliminated the PPA process. Still, San Francisco Planning policy mandates a neighborhood notification process before a project proponent files an application, and a pre-application hearing called the "Pre-Application Community Outreach Process" or "Pre-Application Meeting."[75] This pre-application process requires project proponents to send notices and copies of plans to adjacent neighbors and neighborhood organizations *before* applying to develop land for any new construction or alteration that would change an existing structure by 7 vertical feet or 10 horizontal feet. San Francisco Planning compiles the list of neighborhood organizations that project proponents must notify. However, San Francisco Planning does not consistently track pre-application meetings in its public portal.

Stakeholders have differing perspectives on the value of this pre-application meeting process. Some Commissioners and Supervisors referred to the pre-application process as important community outreach. Other stakeholders perceive it as a requirement that assumes conflict exists before a developer has even proposed a development.

### Application intake processes were inconsistent with the PSA but improved marginally over time.

The Permit Streamlining Act (PSA) requires cities to provide information to applicants about city requirements for applications to develop housing and sets limits on how long a city can take to determine an application is complete and begin planning review. This state law applies to all discretionary development projects that are quasi-adjudicatory actions (like a variance or conditional use requirement). The PSA also limits the amount of time a city can take to process an application, but the clock begins to run after Planning prepares environmental review documents.

We collected information on application dates, and any notices regarding the status of applications and the dates of those notices, when available on PIM, for 135 discretionary, non-ADU entitlements that we believe did not require a legislative act or development agreement for approval. This list includes more observations than we analyze—or it includes observations we collected some data on that we did not include in our timeline analysis because they were not yet entitled, or they were entitled in 2022 or 2023 .

Of these 135 observations, we found notifications sent to project proponents about their entitlement's application status (inclusive of notices about the incompleteness of their applications) for 75 observations(~56%). Of those 75 observations, we were able to determine

[75] *Pre-Application Meeting*, S.F. PLAN., https://sfplanning.org/resource/pre-application-meeting (July 30, 2023).

an application date and notice of status date for 72 observations. Of those 72 observations, 56 notifications (~78%) were outside of the required 30-day period. Of the 56 (out of 72 observations) that are in our dataset for analysis (observations entitled from 2018 - 2021), 41 notifications (~73%) were outside of the required 30-day period.

This does not mean that San Francisco Planning complied with the PSA in the other 60 instances, only that there is insufficient data to determine compliance or non-compliance with the PSA in half the observations.

We also looked at whether San Francisco Planning improved its project intake and notification processes over time. We have a confirmed application date for 130 out of 135 observations. In all five observations where we could not confirm an application date, we could also not confirm a notice of status date. Of these 130 observations, 65 observations have a confirmed application date after 1/1/2018, and 65 observations have a confirmed application date before 1/1/2018.

Of the 65 observations that have a confirmed application date after 1/1/2018, we found San Francisco Planning sent notifications to project proponents about their entitlement's application status (inclusive of notices about the incompleteness of their applications) for 53 observations (~82%). Of these 53 observations, 37 notifications are dated after the required 30-day period (70%). Of the 65 observations that have a confirmed application date before 1/1/2018, we found notifications sent to project proponents about their entitlement's application status (inclusive of notices about the incompleteness of their applications) for 19 observations (~29%). Of these 19 observations, 19 notifications are dated after the required 30-day period (100%). This suggests that San Francisco improved its application intake and notification process, but only marginally. What is also clear is San Francisco Planning is doing a better job to track the data, which can facilitate internal monitoring of this issue and continued improvement.

*Table 9: Analysis of Application Status Notifications*

| | Application Date Before 1/1/2018 (N=65) | Application Date After 1/1/2018 (N= 65) |
|---|---|---|
| Percentage of observations where notice of application status is available | 29% (N=19) | 82% (N=53) |
| Percentage of observations where notice, if available, is outside of the required 30-day period | 100% (N=19) | 70% (N=37) |

## Planning policy relies on exemptions to comply with CEQA, but local rules require additional studies.

State law provides that if a development approval is discretionary, CEQA applies. With a few exceptions, local law determines whether CEQA applies to classes of housing development by making those housing approvals discretionary. State law, however, allows cities to quicken environmental review for some development. There are statutory exemptions in the California Public Resources Code, and the state's CEQA Guidelines provide for another thirty-three categorical exemptions. For example, a planning department can use the Class 32 infill exemption for an urban infill project to bypass CEQA review if the project satisfies certain conditions. The department must still prepare documentation. But the process is comparatively

faster than more intensive environmental review processes, like an Environmental Impact Report (EIR), within most jurisdictions in the state.

When a project is not categorically exempt, the planning agency conducts an initial study to assess whether there is substantial evidence that the project will have a significant effect on the environment. If it is not clear that the impacts can be mitigated below a significance threshold, a planning agency must prepare an EIR. If there is not substantial evidence of a potentially significant effect on the environment, the agency issues a Negative Declaration (ND). If there is substantial evidence that a project will significantly impact the environment, but the developer can properly mitigate the effects, then the agency issues a Mitigated Negative Declaration (MND).

California law also allows the planning agency to reuse existing EIRs to facilitate "streamlining" some classes of development through the environmental review process. This is called "tiering." Tiering allows the proposed development to satisfy CEQA's requirements by relying on existing EIRs, typically programmatic EIRs associated with a plan, and narrowing the environmental review documents to only those issues that have not been evaluated in a prior EIR that covers the proposed project. Tiering requires a prior environmental review document (generally an EIR) typically connected to a prior large-scale planning approval (usually a General Plan or Specific Plan); however, the source of the document varies. A Community Plan Exemption (CPE), for example, is a tiering-based exemption available to projects consistent with a community plan, General Plan, or zoning. When proposed development satisfies environmental review through tiering, it should theoretically reduce project-level costs for the developer because cities generally pay the costs of the relevant plan- or program-level EIR.[76]

EIRs are uncommon in San Francisco. Most developments benefit from streamlining. San Francisco is like its neighbors in this way, though San Francisco's timeframes are quite different from other neighboring jurisdictions we have studied. One notable change between 2014 - 2017 and 2018 - 2021 is that there are more categorical exemptions in the latter four years. That highlights that San Francisco Planning made a change in planning practice that simplifies and lightens the burden of environmental review for qualifying development—and yet overall, entitlements timelines increased in 2018 - 2021.

[76] Robert Olshansky, *The California Environmental Quality Act and Local Planning*, 62 J. AM. PLAN. ASS'N 313, 319–20 (1996).

*Table 10: CEQA Compliance Pathways*

| Year Entitled and N | Categorical Exemption | Tiering (CPE) | Addendum | MND/ND | EIR | Multiple Pathway | CEQA Unknown* |
|---|---|---|---|---|---|---|---|
| 2014 (N=24) | 4% | 79% | 4% | 0% | 12% | 0% | 0% |
| 2015 (N=23) | 4% | 56% | 4% | 15% | 15% | 7% | 0% |
| 2016 (N=55) | 16% | 67% | 0% | 11% | 5% | 0% | 0% |
| 2017 (N=38) | 3% | 82% | 0% | 3% | 11% | 0% | 3% |
| 2018 (N=31) | 29% | 45% | 3% | 13% | 3% | 3% | 3% |
| 2019 (N=29) | 48% | 38% | 0% | 10% | 0% | 0% | 3% |
| 2020 (N=18) | 44% | 17% | 6% | 17% | 17% | 0% | 0% |
| 2021 (N=33) | 52% | 33% | 0% | 9% | 6% | 0% | 0% |

Although San Francisco uses exemptions and tiering to comply with CEQA, local rules, not state CEQA guidelines, also require developers complete additional studies. Developers and planners in interviews and meetings indicated that local law demands that planning require wind and shadow studies. We collected information on whether San Francisco Planning required additional studies for 100 discretionary, non-ADU observations. We found no information about wind studies in San Francisco's public portal, which is noteworthy because wind studies came up frequently in interviews. Also, we note here that Class 32 infill exemptions require Transportation Demand Management studies.

Out of the 44 observations that satisfied CEQA through a Categorical Exemption, 22 (50%) required additional studies.

- ~18% (N=8) of all observations that benefited from a Categorical Exemption (N=44) also required a Shadow study.
- ~43% (N=19) of all observations that benefited from a Categorical Exemption (N=44) required a Transportation Demand Management study.
- ~11% (N=5) of all observations that used a Categorical Exemption (N=44) required both Shadow and Transportation Demand Management studies.

Out of the 33 observations that satisfy CEQA through a Community Plan Exemption, 24 (72%) required additional studies.

- ~32% (N=11) of all observations that used CPE (N=33) also required a Shadow study.
- ~70% (N=23) of observations that used a CPE (N=33) also required a Transportation Demand Management study.

- ~30% (N=10) of all observations that used a CPE (N=33) required both Shadow and Transportation Demand Management studies.

One observation (out of two) that complied with CEQA through a CEQA Addendum required a Transportation Demand Management study. Neither project required a Shadow Study.

Out of the 12 observations that required a Negative Declaration or Mitigated Negative Declaration, 10 (83%) required additional studies.

- ~33% (N=4) of all observations that required a ND or MND (N=12) required a Shadow Study.
- ~67% (N=8) of all observations that required a ND or MND (N=12) required a Transportation Demand Management study.
- ~17% (N=2) of all observations that used an ND/MND (N=12) to satisfy CEQA required both Shadow and Transportation Demand Management studies.

Out of the six observations that required an Environmental Impact Report, 3 (50%) also required a Shadow Study.

## Risk of costly local appeals drives cautious environmental planning practices that limit the impact of the PSA.

In theory, using streamlined environmental review should quicken the planning review process. The PSA sets sixty-day time limits on approving development proposals that qualify for CEQA exemptions and streamlining, once the city makes a determination that the development is exempt from environmental review.[77] But in San Francisco, that is not necessarily true. One possible explanation might be that if environmental determinations always follow other entitlement approvals, using a streamlined environmental review process may have little impact on overall timelines if the other approval steps require more time (though a streamlined process should still reduce costs associated with more intensive environmental planning review).

After reviewing pre-application requirements and notification practices, we explored the data to understand when San Francisco Planning began environmental review and made CEQA determinations. We were able to isolate the environmental review determination or approval date in 95 of our discretionary non-ADU observations. Figures 4 and 5 illustrate what we found: that environmental review determinations almost always happen close to or at the same time as final entitlement decisions under local land use regulation. In 20 of those observations, the environmental determination and approval date is also the latest approval. For the remaining observations in this group, environmental determinations or approvals are often close to the final entitlement date. For 21 (out of 95) observations, the environmental approval date is at most seven days before the final approval date. For 36 (out of 95) observations, the environmental approval date is at most 30 days before the final approval date. For 48 (out of 95) observations, the environmental approval date is at most 60 days before the final approval date. This is important because of the limitations on entitlement review timeframes that the PSA imposes but, as noted, the clock begins to run after Planning prepares environmental review documents, not before. Because environmental determinations occur so close to the end of the entitlement period, the PSA seems to have little effect on overall entitlement timeframes.

[77] CAL. GOV'T CODE § 65950 (West 2023).

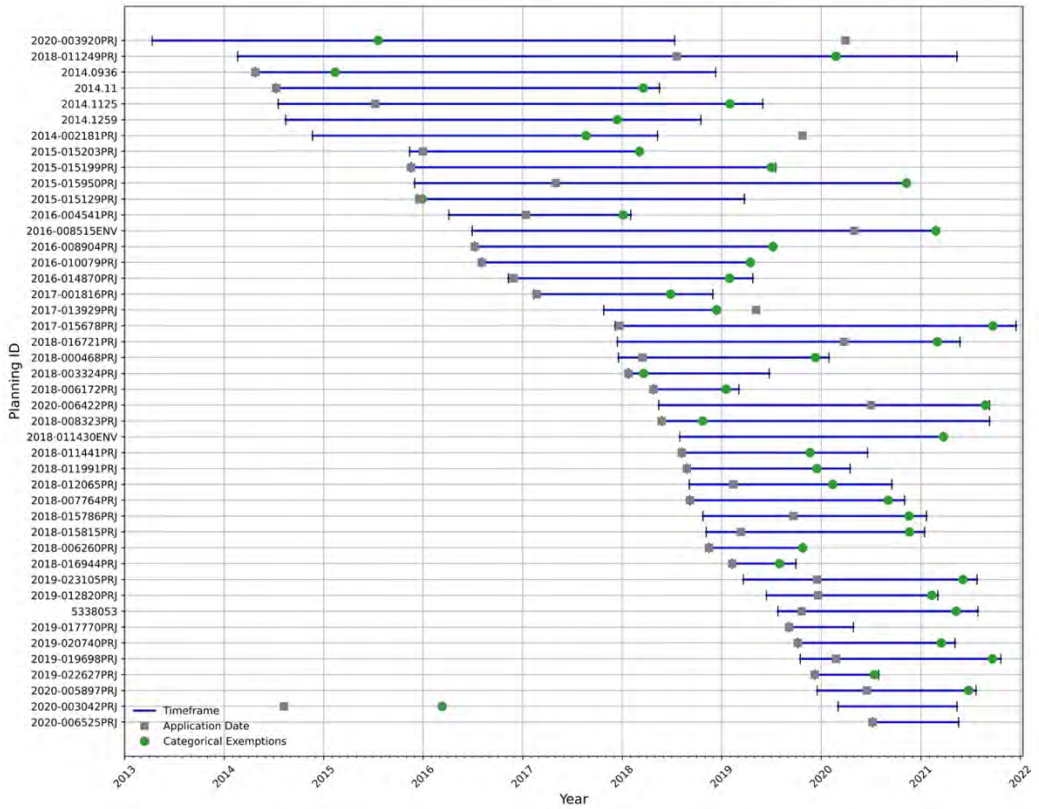



*Figure 4: CEQA Milestone Timelines Categorical Exemptions Only (2018 - 2021)*

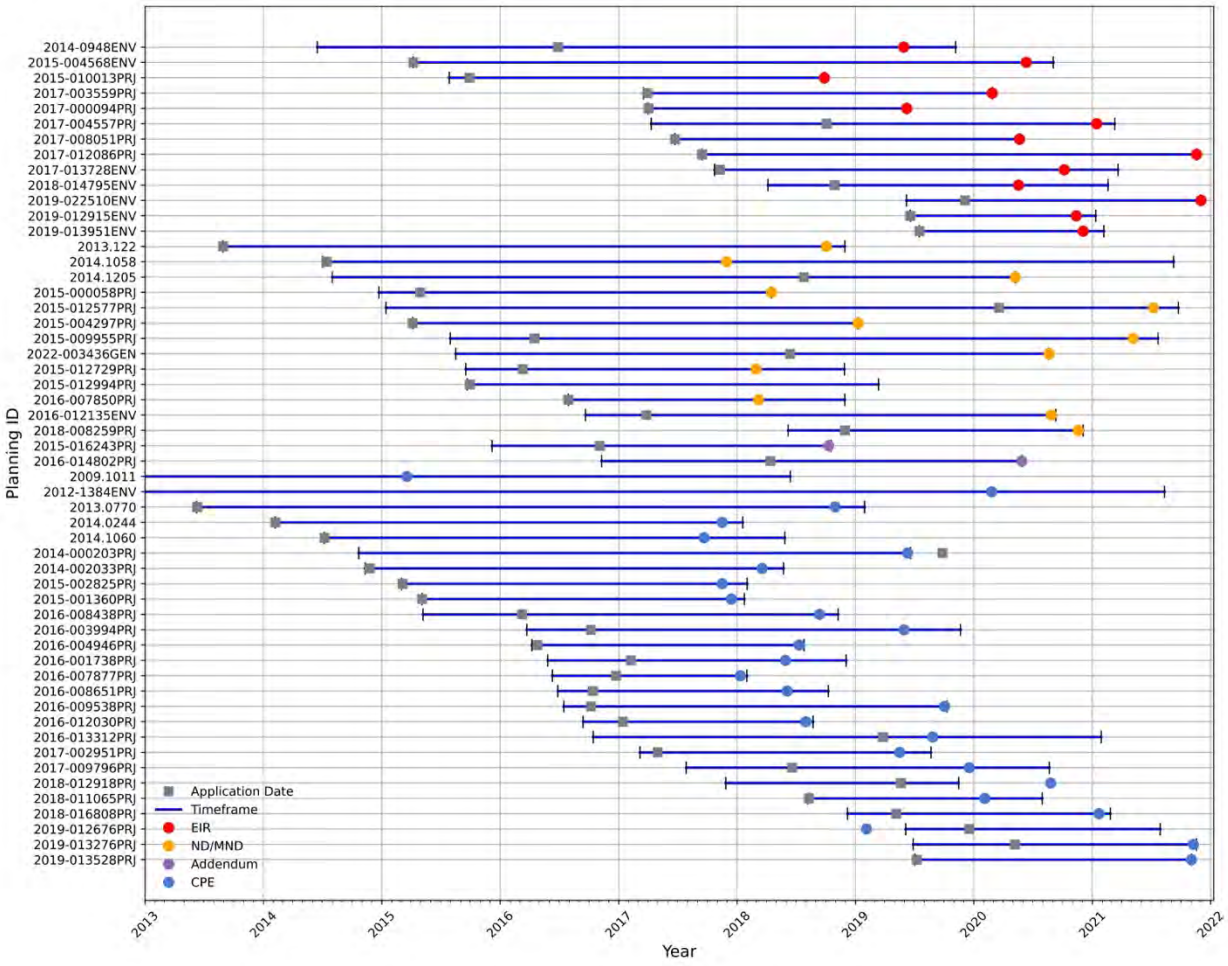



*Figure 5: CEQA Milestone Timelines Multiple Pathways (2018 - 2021)*

Commissioners, planners, and developers all agreed that CEQA slows approvals, and all—including planners and Commissioners—expressed concerns about CEQA abuse. During interviews and meetings with these stakeholders, we asked why environmental review takes as long as it does, as most development in San Francisco is categorically exempt from environmental review or benefits from a streamlined CEQA process. Developers believe San Francisco Planning is too slow to assign environmental planners to projects. Commissioners believe planners are overly cautious because they fear judicial scrutiny. In contrast, planners from multiple departments shared that there are two features of local rules that extend environmental review: (1) local rules requiring further studies add more work, and (2) administrative appeals, or the risk of administrative appeals, to the Board of Supervisors[78] steers planning practice and influences how long review takes overall.

On the second point, planners elaborated that because it is easy to appeal planning approvals, the risk of appeal influences planning practices. For environmental review, both Commissioners and planners perceive that there is a high risk that project opponents will challenge projects by

[78] State law governs much of the requirements for administrative appeals of CEQA determinations (*see* CAL. PUB. RES. CODE § 21151(c) (West 2023); CAL. CODE REGS. tit. 14, § 15025(b) (West 2023)) but local rules require that the filing deadline for an administrative appeal of a CEQA determination begins to run only after final entitlement decisions under local land use regulation.

challenging environmental determinations. What is most striking about the difference between Commissioner and planner perspectives is that Commissioners believe planners are worried about judges, but planners expressed confidence that their work would survive judicial scrutiny. Instead, planners expressed concerns regarding the Board of Supervisors.

Planners shared that even if most administrative appeals are withdrawn or denied, the beginning of an appeal creates more work for planning staff members managing environmental review. That additional work changes the pace of all environmental planning reviews for all projects because the projects that face an administrative appeal change review priorities. Also important, the experience of the administrative appeal for planners during the administrative appeal hearing influences their approach to work, overall. The risk of an appeal makes planners more conservative and risk-adverse in their work. One notable trend in interviews and meetings with planners was that planners appeared much more apprehensive of the Board of Supervisors than potential litigants. One planner also stated that, when elected, political bodies are highly critical of planning staff work within a public hearing. This can be demoralizing and impacts the department's working culture.

We reviewed our data across 2014 - 2021 to determine the rate of administrative appeal (inclusive of CEQA-related appeals and other appeals). At least 14% of the approvals in our data (2014 - 2021) faced administrative appeals. We say *at least* 14% because we are not certain that we have located all records on local administrative appeals, as the city does not make past records on administrative appeals readily available online. It is also true that most of the appeals we could locate are denied or withdrawn, and most administrative appeals involve challenges to CEQA determinations as well.

San Francisco Planning's environmental planning division also tracks administrative appeals worked on by their team. This log captures appeals of residential and non-residential entitlements. We reviewed their log of staff hours spent on administrative appeals involving CEQA. Twenty out of 48 administrative appeals filed in 2015 - 2021 that San Francisco Planning tracked overlap with our 2014 - 2021 dataset. Of these 20, the internal department data offers information on cost and time for 19 of our observations. Although the other appeals are not for multi-family housing development, planners shared that these appeals also influence how planners work on housing entitlements. Out of the 20 administrative appeals associated with entitlements in the CALES dataset, San Francisco Planning data indicates that 11 (55%) were denied, five (25%) were withdrawn, only one was upheld, and three were closed with no other details.[79]

San Francisco Planning reports that it logged a total of 5,680.75 hours because of all 48 administrative appeals related to CEQA that they tracked from 2015 - 2021. San Francisco Planning logged a total of 3,031.25 additional staff hours to prepare for CEQA-related administrative appeals associated with entitlements in the CALES database. Translating these hours into days, we find that on average, planners add about 20 days of work per year to their workload to deal with CEQA-related administrative appeals for housing entitlements.

[79] This is consistent with what San Francisco Planning reports for all of the administrative appeals.

*Table 11: Total Time Spent on All CEQA Appeals 2015-2021 N=48*

| (days) | Minimum | **Median** | Max. | **Mean** | **Standard Deviation** |
|---|---|---|---|---|---|
| Total Time Related to Admin. Appealed | 0.56 | 8.69 | 71.06 | 15.11 | 14.92 |

*Table 12: Total Time Spent on CEQA Appeals 2015-2021 for CALES Observations*

| (days) | Minimum | **Median** | Max. | **Mean** | **Standard Deviation** |
|---|---|---|---|---|---|
| Total Time Related to Admin. Appealed | 1.88 | 12.78 | 71.06 | 19.94 | 18.05 |

Administrative appeals add costs to the developer in lost time and higher holding costs, but there are also direct costs to the city associated with the work to prepare for an appeal, even if the appeal is withdrawn. San Francisco Planning reported that all administrative appeals related to CEQA cost the city a total of $793,993 in the years where San Francisco tracked the data (2015-2021). Administrative appeals related to CEQA and associated with entitlements in the CALES dataset (2015-2021) cost the city a total of $421,314. One entitlement in our dataset, 1500-1540 Market Street,[80] required 374 additional staff hours and $52,204 in costs to San Francisco Planning to prepare for the appeal—even though the appeal was withdrawn.

*Table 13: Total Cost CEQA Appeals 2015-2021 (N=48)*

| (USD) | Minimum | **Median** | Max. | **Mean** | **Standard Deviation** |
|---|---|---|---|---|---|
| Total Cost Related to Admin. Appeals | $535 | $10,245 | $81,558 | $16,893 | $16,860 |

*Table 14: Total Cost CEQA Appeals CALES Housing Only (N=19)*

| (USD) | Minimum | **Median** | Max. | **Mean** | **Standard Deviation** |
|---|---|---|---|---|---|
| Total Cost Related to Admin. Appeal | $2,167 | $13,741 | $81,558 | $22,174 | $20,501 |

[80] This is a 100% market-rate mixed-use development that satisfied the inclusionary program with an in-lieu fee.

During interviews and meetings, we also learned that San Francisco Planning has undertaken substantial internal work to address at least some part of this problem by consolidating what is presently six steps in the planning review and permitting into three steps. The aim is to bring the process from application through permitting into one department and facilitate one appeal period for project proponents. It is unclear, however, how these proposed operational changes would address post-entitlement appeals, if at all.

## Continuances—possibly meant to avoid later challenges through administrative appeal—are frequent.

According to stakeholders, changes to the proposed development might appear voluntary but result from negotiations outside of hearings facilitated by Planning staff (who are mediating between project proponents and opponents) before a scheduled Planning Commission hearing. The negotiation is meant to facilitate Planning Commission approval, but developers report that what developers end up agreeing to can render a project infeasible. This is another perception that is difficult to verify through government documents, as there would be no written record of negotiations occurring informally before a scheduled hearing. Stakeholders suggested we look for continuances, or a frequency of continuances and multiple hearings, as evidence of this outcome.

We have 93 discretionary, non-ADU observations that required quasi-adjudicative hearings (but not legislative action). All 93 observations have *some* information about hearings, but only about half have complete information about hearings. Still, approximately 22% (N=20) of these observations, inclusive of observations that do not require public hearings under local zoning and planning law, have multiple hearings or continuances associated with a single approval step. One of the entitlements with multiple hearings had multiple hearings related to CEQA approvals. Another two observations were related to density bonus approvals only—one related to the local program and the other to State Density Bonus Law. Nine observations had more than three continuances or hearings for a single approval step. One of these observations (out of nine) is a discretionary building permit project (with no request for exceptional DR), which utilized San Francisco's local density bonus program, HOME-SF, for approval. The two continuances and one hearing for this observation were associated with the approval of the local density bonus program. This building permit project's application date was 3/3/2020, and San Francisco Planning approved it on 5/13/2021. Three observations required five or more hearings for approval. One of these projects had nine continuances for the same approval step. It is also possible that the rate of multiple hearings for a single approval step *might be higher* than what the data currently reveals—as interviews suggest. Our ability to verify these statements against hearing-related data is contingent on San Francisco Planning making the data publicly available.

When we analyze our data overall, we find that the density proposed is greater than density in final approval for 23 observations. Four (out of 23) observations are associated with a continuance. Another two (out of the 23) are associated with an administrative appeal.

## Publicly Initiated Exceptional DR occurs frequently and may foster negotiations outside of public hearings.

San Francisco uniquely allows an interested party to request the Planning Commission exercise exceptional DR, which involves the Planning Commission "effectively taking a second look at the proposed project." This occurs even when the zoning and planning code do not require a

hearing in front of the Planning Commission, but where an interested member of the public states there are exceptional or extraordinary circumstances that warrant a public hearing.

There was not a consensus across stakeholder groups on the impact of this policy. Most of the city personnel and Planning Commissioners we spoke to through HCD-led meetings expressed perceptions that the ability to request exceptional DR is primarily, if not almost entirely, associated with disputes between neighbors relating to modifications or smaller developments (like single-family dwellings). These groups did not perceive exceptional DR as a dominant obstacle to multifamily development but as helpful to mediating smaller disputes between neighbors, even if it might take too much of the Planning Commission's time. San Francisco Planning shared their log of staff hours to support exceptional DR hearings between 2014 - 2021. Exceptional DR adds fees to all permits to support this process; the department collects between $750,000 - $1 million per year in permitting fees to support staff time for the exceptional DR process.

When we examine data on the staff hours logged to support exceptional DR, we find that between 2014 – 2021, San Francisco Planning had to allocate ~1,872 full days (8 hours per day) or ~7 business years (262 days at 8 hours per day) to additional work to respond to exceptional DR requests. But only about 4% of those hours were spent on exceptional DR requests associated with the multifamily housing entitlements in our dataset. From the perspective of staff who manage that work, the number of work hours dedicated to addressing exceptional DR hearings, generally, may make the same work for multi-family housing seem minimal compared with the work hours spent addressing all other exceptional DR requests. This may influence staff and Commissioner perceptions of whether DR burdens developers proposing multifamily housing.

But we also found that across almost all participants in confidential research interviews (where HCD was not present), regardless of the stakeholder group, exceptional DR was a dominant issue. The only interview participants that did not to bring up DR were those participants that self-described as only having worked with large-scale phased developments. Interview participants raised the topic of DR as a key obstacle to housing production and described the Planning Code Section 311 neighborhood notification process associated with a discretionary building permit, and potential for a request for DR and related hearing, as an opportunity to oppose entitlement on the eve of approval. Stakeholders described this provision as offering an early "appeal" of a planning approval for smaller or mid-size code compliant buildings. These participants also shared that even the request for DR could result in a change to the project that results in something that is no longer financially feasible to build.

Some stakeholders also shared that opposition comes from different types of neighbors; some are interested in the impacts on their own properties, but others use this process to address neighborhood-level concerns. In the latter context, stakeholders share that frequent project-level adjudications are the consequence of inequitable zoning and planning. The DR provision also came up in interviews when parties discussed the suggested reforms laid out in the recent housing element. Some city personnel that expressed support for proposed rezoning, specifically upzoning in more affluent areas, also predicted that upzoning without eliminating DR in certain neighborhoods would result in project opponents effectively using DR to delay housing development. In terms of its use, there are publicly initiated requests for DR for 19% of the discretionary building permits in our 2018 - 2021 data and 21% in the 2014 - 2017 data—for a combined rate of 20% across eight years for building permits only. We also know that the developments that require exceptional DR take comparatively longer to entitle, as well. The frequency with which exceptional DR comes up for code compliant multi-family housing (relative

to other code compliant multifamily housing) might explain why different stakeholder groups have such different perspectives on the same procedural rule, in terms of its influence on entitlement timelines generally.

In our 2018 - 2021 data, 35% of all variances also had hearings for exceptional DR. There were also another two requests for exceptional DR associated with discretionary ADU observations. One of the requests for exceptional DR was withdrawn. The Planning Commission heard the second request and granted DR. There are an additional two requests associated with approvals that already went before the Planning Commission—but the Planning Commission heard both requests for exceptional DR (and denied them).[81]

During interviews, stakeholders reported that once a party requests DR, Planning Staff (to mediate between the project proponent and the party requesting DR) might verbally ask the developer to change the proposed development to incentivize the party requesting DR to withdraw their request. We cannot verify this through the available entitlement data, however.

We explored the data to find instances of requests for DR being associated with developments that change in size (measured by units) over time. We did come across two proposals to develop five or more units through the local ADU ordinance that resulted in tenant requests for DR, though both would later be withdrawn. The first development that would lead to a tenant request for DR involved a request for five ADUs that required a variance. The Zoning Administrator approved a variance for three units, and a later revised approval document states the proposal changed from five to three units. The request for DR occurred after the variance approval, but before the later revision—though there is nothing that indicates there is a relationship between the request for DR and the later revision to the proposed number of units. In the request for DR, the tenants complain that the approved ADUs would interfere with parking both temporarily and permanently. The tenants also detail an ongoing dispute with the project proponent, their failed attempts to initiate mediation, and their failed efforts to delay final permitting.

Another DR request involved a proposal to build nine ADUs, but a building permit was ultimately issued for just six units. This project involved no special discretionary approval step, so it is even more difficult to determine why the proposal changed over time. The DR documents indicate that the organization that requested exceptional DR initiated the request because of concerns about the impact of the ADUs on parking, and the specific impact on a family with a child with a disability. The request for DR was ultimately withdrawn. Again, there is no data that directly links the reduction from nine to six units to the DR request; the DR request only indicates an ongoing dispute with tenants over parking impacts related to an accessibility and disability issue.

## Developers report that design guidelines are vague and invite subjective conditions of approval.

Planners and developers describe design guidelines as highly subjective, allowing for random outcomes, problematic, and wielded as a “weapon.” Many stakeholders report that the design guidelines are not about design; they are about anticipating complaints from neighbors around light, air, “inches or feet” in setbacks, and related features within development that trigger complaints from neighbors, and satisfying neighbors.

[81] One of these observations required a CUA and the other required a zoning map amendment.

Planners shared that although the guidelines are not part of the Planning Code, they are codified in a roundabout way through a cross reference to the Planning Code. For example, Section 311(c)(1) of the Planning Code provides that Residential Design Guidelines shall be used to review plans for all new construction and alterations of existing residential buildings in R Districts. According to the Planning Department, "The Residential Design Guidelines (Guidelines) articulate expectations regarding the character of the built environment and are intended to promote design that will protect neighborhood character, enhancing the attractiveness and quality of life in the City."[82]

Importantly, developments that comply with the Planning Code but do not conform to the Guidelines end up back in deliberative processes, and sometimes back in front of planning staff, even when they have completed planning review and secured entitlement. Planners, developers, and architects note, however, that the subjectivity in the Guidelines makes this an inevitable outcome. Also, in the context of discretionary building permits, the design guidelines raise issues that often lead to requests for exceptional DR as well.

The Guidelines are filled with requirements that on their face allow for subjective interpretation through words like "compatible," "respect," and "character." Examples include, "In areas with a defined visual character, design buildings to be *compatible* with the patterns and architectural features of surrounding buildings." Explanatory text mandates that designers in areas of "mixed visual character" "draw on the *best* features of surrounding buildings" and "design buildings to help define, unify and contribute positively to the existing visual context." *Site Design* guidelines are also often subjective, requiring, for example, that designs "*[r]espect* the topography of the site." Guidelines addressing *Building Scale and Form* intend to ensure design is "*compatible* with that of surrounding buildings." Scale of buildings must be "*compatible*" in terms of height and depth of surrounding buildings, as well as with the "scale at the street" and mid-block open spaces. Building forms, facades, proportions, and rooflines must be "*compatible*" with those of existing buildings.

## Cumulative and unique procedural hurdles create comparatively long entitlement timelines.

We explored our 2014 - 2017 data to run a comparative analysis with neighboring cities where we had similar data. Importantly, our 2014 - 2017 dataset indicates that entitlement timelines were generally *shorter* than in 2018 - 2021. Still, 2014 - 2017 timelines were longer than other jurisdictions. We searched our data to match observations from our 2014 - 2017 data with similar entitlements in Oakland, Berkeley, and Redwood City, looking for the best matches across the following characteristics:

- Same neighborhood characteristics (defined by 2019 Tax Credit Allocation Committee maps; we do not match high resource neighborhoods with low resource neighborhoods);
- Either for sale or for rent (in other words, we do not compare for sale developments to for rent developments);
- Around the same size (plus or minus five units). They need to have the same income characteristics (either all market-rate, all mixed-income, or all 100% affordable developments); and

[82] *Residential Design Guidelines*, S.F. PLAN., https://sfplanning.org/resource/residential-design-guidelines (Mar. 4, 2020).

- Similar local process characteristics (we do not compare a code compliant development that also benefited from a CPE with a non-code compliant development that required a conditional use permit or variance but also benefited from a CPE).

We use these criteria based on several assumptions about neighborhood-level politics across all cities. For example, we assume the political context varies across neighborhood types (in terms of income level). We also assume that neighborhood opposition might vary based on project type (for sale condos versus for rent apartments, and affordable versus market-rate). The last criterion (process steps) is the most difficult for us to match because no two study cities have identical regulatory environments. We therefore looked for equivalencies within local processes based on whether a development required special approvals or not.

We were unable to find matches in Berkeley and Redwood City. We found that the average difference between all San Francisco-Oakland pairs is 1,086 days (~3 years). The difference in timelines appeared related to San Francisco's pre-application requirements and exceptional DR process.

*Table 15: Comparison of Entitlements Requiring CPEs Oakland-San Francisco 2014 - 2017 data*

| Address Jurisdiction | Project Size (units) and Type | 2019 TCAC Classification | Neighborhood (Name) | Affordability | Compliance with IZ (SF) | Required Local Approvals | Timeframe to Entitlement (days) | Difference in Timeframes [83] |
|---|---|---|---|---|---|---|---|---|
| 1924 Mission San Francisco | 11 units for rent | Low Resource | Mission | Market-Rate (possibly 1 1-bedroom affordable unit)[84] | On-site | Discretionary Code Compliant (Building Permit only) | 1,203 days | – |
| 3253 Ettie St. Oakland[85] | 9 units for rent | Low Resource | Clawson | Market-Rate | N/A | Discretionary Code Compliant (Design Review only) | 348 days | 855 days |
| 7540 Macarthur Oakland | 11 units for rent | Low Resource | Eastmont Hills | Market-Rate | N/A | Discretionary Code Compliant (Design Review only) | 51 days | 1,152 days |
| | | | | | | | | |
| 198 Valencia St. San Francisco | 28 units for rent | Low Resource | SoMa | Market-Rate | Unknown | Variance, Public Initiated Discretionary Review | 1,302 days | – |
| 3129 Elmwood | 30 units for rent | Low Resource | Jingletown | Market-Rate | N/A | Variance, Design Review | 150 days | 1,152 days |

[83] Only populated for Oakland projects. This column shows the many more days it took for the Oakland project to entitle, relative to its matched San Francisco project.
[84] There is an August 2018 One Unit Compliance with Inclusionary Housing Program Affidavit that provides that one of the one-bedroom units would be affordable—but we could not locate a deed restriction in PIM.
[85] It looks like the developer successfully secured excavation, electrical, mechanical, and plumbing building permits post-entitlement in 2018, but those expired in 2019 and 2020.

| Address Jurisdiction | Project Size (units) and Type | 2019 TCAC Classification | Neighborhood (Name) | Affordability | Compliance with IZ (SF) | Required Local Approvals | Timeframe to Entitlement (days) | Difference in Timeframes [83] |
|---|---|---|---|---|---|---|---|---|
| Oakland | | | | | | | | |
| 956 63rd St. Oakland | 28 units for rent | Low Resource | Paradise Park | Market-Rate | N/A | Variance, Design Review | 105 days | 1,197 days |
| | | | | | | | | |
| 645-647 Valencia St, San Francisco | 7 units for rent | Moderate Resource | Mission | Market-Rate | N/A | Variance, Public Initiated Discretionary Review | 1,435 days | – |
| 4429 Piedmont, Oakland | 9 units for rent | Moderate Resource | Piedmont Avenue | Market-Rate | N/A | Variance, Design Review | 137 days | 1,289 days |
| | | | | | | | | |
| 2201 Market San Francisco | 17 units for rent | Low Resource | Mission | Market-Rate | Fee | Variance, Public Initiated Discretionary Review | 1,160 days | – |
| 5325 San Pablo Oakland | 17 units for rent | Low Resource | Gaskill | Market-Rate | N/A | Variance, Design Review | 287 days | 873 days |

## Stakeholders report that San Francisco's policy emphasizes project-level adjudication to achieve equitable development outcomes, when what the city needs to achieve equitable development outcomes is zoning and planning reform.

The comparatively longer timeframes in San Francisco are associated with processes that illustrate a larger, complex, and recurring theme that dominated several interviews with developers, planners, and affordable housing advocates. From the table above, we pull out the entitlement at 1924 Mission to explain what stakeholders report—San Francisco's current policy attempts to resolve neighborhood-level concerns about inequitable land use development through project-level adjudication rather than more equitable planning and zoning.

1924 Mission Street involved a proposal to construct an 11-unit building with ground-floor retail on a site with an auto body shop. The project proponent submitted a required PPA in March 2014.[86] This pre-application process required submitting an application for assessment with the site plan, floor plan, building elevations, and photographs. This PPA process also required

[86] This is a required process applicable (at the time) to all proposed developments of seven or more units. San Francisco has since modified applicability; it is required for developments of 10 or more units, creation or expansion of group housing using 10,000 square feet or more, and unspecified "other complex projects." *Preliminary Project Assessment (PPA)*, S.F. PLAN., https://sfplanning.org/resource/ppa-application (July 11, 2023).

notice to the neighborhood[87] and a pre-application neighborhood meeting. The pre-application neighborhood meeting is supposed to identify neighborhood grievances and prevent requests for exceptional Discretionary Review.[88] Importantly, developers state that these pre-application processes do *not* achieve that end, and this example is consistent with those perceptions.

The Planning Department issued a Certificate of Determination on April 2, 2015, that the project qualified for a CPE (tiering). According to the Notice of Building Permit Application, the project proponent then applied for discretionary building permits on May 23, 2016.[89] The Planning Department issued the Notice of Building Permit Application on March 20, 2017.

A local neighborhood organization applied for the Planning Commission to take exceptional Discretionary Review on April 19, 2017. The application for exceptional Discretionary Review provided that the neighborhood organization requesting review believed the proposed development was inconsistent with the General Plan's policy priority that "[t]hat existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods."[90] The application for Discretionary Review stated that proposed rents would be high, and expressed concern that "gentrification-inducing design, intended to target higher-end tenants, will create local upward price pressure on surrounding tenants."[91]

Importantly, the neighborhood organization expressed concerns that this proposed development was one of several that created harm in the neighborhood. The applicant noted that the harm was related to "the cumulative impact of this and the other seven projects proposed for the immediate vicinity of Mission St."[92] The request for Discretionary Review asked that the Planning Commission consider the cumulative impacts associated with the proposed development and other developments and "demand this project alter its appearance in order that it comes into line with neighboring buildings on the Mission corridor in a way that better helps 'preserve the cultural and economic diversity' of the corridor and the Mission District."[93]

The Planning Commission heard this request on July 6, 2017. The Planning Commission agreed that there were "extraordinary and exceptional circumstances" that warranted Discretionary Review and that "project refinements were necessary to address concerns over the project's compatibility with the surrounding neighborhood." The Planning Commission conditioned the building permit approval on the following grounds: the ground floor retail space needed to be designated for trade shop use, the project proponent needed to explore providing a mural on one wall, and the project proponent needed to "work with Planning Department staff on refin[ing] the exterior design to provide a stronger relationship to the surrounding context." The Building Department issued a demolition permit to demolish the auto body shop in August

[87] The notice requirements for the Pre-Application Meeting demanded notification to all property owners within a 300 feet radius, all relevant neighborhood organizations, and anyone who requested notice. Meetings may only be held during certain hours, and project proponents must keep a record of all attendees.
[88] The first page of the Pre-Application Meeting Packet logged in PIM provides: "The meeting's intention is to initiate neighbor communication and identify issues and concerns early on; provide the project sponsor the opportunity to address neighbor concerns about the potential impacts of the project prior to submitting an application; and, reduce the number of Discretionary Reviews (DRs) that are filed."
[89] There is no Project Application logged in PIM.
[90] This language comes from the Application for Discretionary Review, page 4, logged in PIM.
[91] Id.
[92] Id.
[93] Id.

2019 and a temporary shoring permit for an empty lot in 2021. DBI's Permit Tracking system seems to indicate review of plans through spring of 2021, but no activity is logged after that.[94] It is also unclear how the final project-specific conditions of approval resolve the larger, neighborhood level concerns about gentrification and displacement raised during this request for exceptional Discretionary Review—which are at least in part related to the city's zoning and planning that dictates where developers may build multi-family housing citywide.

## Planners and developers believe San Francisco needs procedural reform that addresses discretionary review, but not all Commissioners and Supervisors agree.

Stakeholders explained that three features of San Francisco's local law invite project-by-project adversarial politics that will prevent San Francisco from meeting housing production targets and equitable housing outcomes: (1) density and use controls that limit development to specific neighborhoods, (2) procedural law and policy that renders all approvals discretionary, and (3) charter provisions that allow project opponents to appeal multiple post-entitlement construction permits.

When discussing SB 35, affordable developers and planners explained the state ministerial process resolved the second issue without touching the first or third. SB 35 may fix planning review for eligible projects, but it cannot fix San Francisco's housing production pipeline because two major impediments to production remain. (SB 35 also only applies because San Francisco has failed to meet its RHNA targets—which is not the city's aim.)

According to planners, developers, and many housing advocates, achieving production targets, affordability, and equity demand long-range planning, rezoning for density in higher opportunity areas in conjunction with a *local* ministerial approval process, and charter reform to limit post-entitlement appeals. Some planners shared that a local ministerial process would have more legitimacy with community members than a state ministerial process; legitimacy that planners perceive as important within San Francisco because of the city's poor track record in prior decades of engaging with certain neighborhoods and low-income communities. But many stakeholders, including planners, shared their belief that current and proposed local procedural reforms, including the Mayor's Housing for All Executive Directive, are insufficient to remove policy constraints on production. According to these stakeholders, current reforms merely "tinker" with the planning code while leaving blanket discretionary review and the administrative appeal process intact. Stakeholders who shared this perspective stated plainly that they think the Mayor's Office can only do so much to fix these issues—the real fix depends on the Board of Supervisors and possibly the electorate. There were a handful of stakeholders who emphasized that the Mayor's Office must lead in addressing problems with permitting and felt entitlement processes were not the problem.

Every stakeholder that shared that San Francisco needs a local ministerial process and charter reform also felt accomplishing either one is politically impossible. Several planners expressed a belief in the need for state intervention—but not necessarily a preference for state intervention. Interview participants across several stakeholder groups emphasized that local processes that require the most reform are intertwined with values and assumptions about what these

[94] It is difficult to ascertain much more than the status of a permit from building permit data.

procedural rules offer in terms of stakeholder engagement, historic and cultural preservation, and ultimately, spatial equity.

Several planners also explained that San Francisco has inadequately engaged community around planning and zoning for decades. There was a consensus among planners that recent efforts by Supervisors to connect with low-income communities around land use still lack sufficient and intentional community engagement. Planners also described a need for the city to mend relationships with community through acknowledgment of and documentation of past harms. Some affordable developers echoed these concepts when they described how some neighborhoods continue to have the city's legacy of racism codified in neighborhood association covenants, conditions, and restrictions (CC&R).

Planning staff and some housing advocates explained that it is not in the city's best interests to keep existing processes as they are if the city's goal is to redress these past harms and increase housing production in an equitable way. But because process requirements are framed as key to stakeholder engagement and participation, planners believe no local political body wants to dismantle them. Process in San Francisco is sacrosanct. Consistent with this perspective from planners, some Commissioners emphasized the importance of engagement, but Commissioners focused on engagement during the project entitlement phase. The difference in how stakeholder groups described the need for community engagement in relationship to planning, zoning, and project development is significant. Planners discussed a need for engagement at larger scales and at the legislative level, to facilitate equitable planning and zoning, not just at the project-level. Commissioners focused on engagement at the project-level.

Interview participants also elaborated and described existing density and use controls and project-level adjudication as reflecting how power over land use is inequitably distributed citywide. Certain neighborhoods wield enough power over political bodies to block changing density and use controls, so no multifamily housing is proposed in the first instance. These constituents who benefit most from the spatial distribution of density and use controls do not need to attend public hearings to block housing development. Developers propose dense multifamily housing (and affordable housing) where housing may be built under zoning and planning standards.[95] That leaves communities in the neighborhoods where zoning allows housing to be built with one primary pathway to access power over land use; they must go through project-level adjudication, or public hearings. Some neighborhoods have built up power over time and can now effectively block all development through project-level adjudication. Other neighborhoods have more recently begun advocating for community needs through project adjudication. Planners also described alliances between wealthy residents and community activists with less money and influence that are working to protect their communities from harm from what they perceive to be the "greedy developer."

Stakeholders explained that project-level adversarial politics may seem responsive to inequitable land use patterns because it allows communities to advocate for what they need, but

[95] These perspectives were consistent with what we discovered in earlier research on San Francisco's zoning, reviewing zoning neighborhood planning between 1921 (beginning with the 1921 San Francisco Building Zone Ordinance, and reviewing 1948, 1979 and 1990 zoning) through the Eastern Neighborhoods Plan adopted in 2009. We found that the entitlements for 5 or more units issued in 2014 - 2017 were concentrated almost entirely in neighborhoods that had zoning for multi-family housing in place since at least 1921 (the Mission) or in neighborhoods that may have been zoned industrial neighborhoods but later rezoned for mixed-use (such as SoMa and Potrero Hill).

this approach fails to change power imbalances or solve for structural inequities. Neighborhoods that have prevented density (through zoning and planning standards) remain unavailable for development. Other neighborhoods feel perpetually burdened. When project opponents from vulnerable neighborhoods cannot stop an approval, they also interpret the entitlement as signaling that political bodies do not care about their neighborhood's needs[96] even though planners state that the opposite is true. Planners believe that the Planning Commission cares very deeply about neighborhood needs. From the perspective of planners, it is because the Commissioners care deeply about neighborhood needs that they slow or block housing approvals.

Planners shared local rules do too little to facilitate meaningful public input into design because the local rules without state intervention lead to just one conversation about how the city may deny the proposed development. Planners perceive that soliciting meaningful community input into design does not happen until political bodies and neighbors accept a project approval is imminent. Only then, according to planners, does the entitlement process facilitate community input to make the design better and prevent unintended harm the neighborhood. But planners report that at present productive dialogue to allow for community input depends entirely on state law that intervenes in local discretion in some way, and that the current local regulatory framework provides an inefficient and slow means to achieve housing production sensitive to neighborhood needs.

Participants in confidential research interviews cautioned that proposals to rezone need to be coupled with local ministerial processes or the rezoning will leave the existing inequities in place. Planners predict that any rezoned neighborhoods that have not welcomed dense housing in the past will use San Francisco's procedural law to block development if rezoning is not coupled with a ministerial approval process. Affordable developers share this perspective. Also, planners believe a local ministerial process would require all parties to pay more attention to the requirements of the code, which would better achieve more predictable and desired housing outcomes. Many planners and housing advocates said that disrupting this structural imbalance of power requires the kind of procedural overhaul that challenges entrenched beliefs about what current discretionary processes offer, which these stakeholders believe makes local procedural reform politically impossible. Planners believe the ideological divide within political bodies limits legislative proposals; planners believe Supervisors are limited to developing legislation that Supervisors believe will get passed,[97] which may or may not result in effective reform. Nonetheless, there was an unequivocal consensus among planners and affordable developers that San Francisco needs major procedural reform because not all neighborhoods welcome affordable housing development.

Although within stakeholder groups there was agreement on these topics, there was no consensus across stakeholder groups on any of these points. Planners and developers (including affordable developers) agree that San Francisco needs substantial local process reform that removes some discretion, but not all Commissioners and Supervisors share this perspective. During meetings with HCD, some Commissioners and Supervisors' perceptions clearly aligned with planners and developers on the relationship between zoning, procedural rules, and substantive standards on development and inequities across neighborhoods. These

[96] During interviews, one development noted as illustrative was 792 Capp Street, which required a Conditional Use Authorization to demolish a single-family dwelling to build four units; the CUA hearing was continued seven times before entitlement.

[97] Supervisor Melgar's public statements during the hearing on June 1, 2023, where she states her recommendations are to help ensure that the Housing Element gets passed, reflect a similar perspective.

participants acknowledged the challenges with existing discretionary review and administrative appeals of post-entitlement permits, and articulated these rules as potential constraints on supply and affordability. These Commissioners and Supervisors explained the difficult tradeoffs political bodies grapple with when developing or amending procedural rules, but they did acknowledge a need for legal reform.

Other Commissioners and Supervisors, however, expressed entirely different perceptions. Some Commissioners and Supervisors emphasized the importance of maintaining discretionary review while proposing that reforms should promote faster, more predictable processes. Some Supervisors characterized San Francisco's political bodies as consistently inclined to approve most proposals for housing and stated that all neighborhoods welcome affordable housing (though they did not distinguish between neighborhood groups responding to proposals to build affordable housing and their own voting records on affordable housing). The perspectives of some Supervisors on the topic of affordable housing sharply contrasted with what both affordable developers and planners shared. Affordable developers stated that many San Francisco neighborhoods do not welcome affordable development and residents are concerned about more units or taller buildings, generally. Affordable developers also perceived the west side of the city as particularly unwelcoming of affordable development.

Some Supervisors also shared their skepticism about the need for market-rate housing supply to address the city's housing issues, and their belief that inadequate funding for subsidized housing was the primary obstacle to addressing the city's housing needs.[98] While affordable developers and planners agreed that more state funding is critical for San Francisco to develop needed affordable housing, affordable developers and planners also called out local policy obstacles to production (including post-entitlement problems). In sum, affordable developers see funding and regulatory reform as both essential to increasing affordable development, whereas some Supervisors critique the latter as an approach to solving the city's housing challenges.

Some Commissioners and Supervisors also expressed deep concerns about state law that they interpreted as punitive, or harmful to local implementation of important aesthetic controls and historic preservation. What also really stood out was the difference between affordable developer and planner perspectives and those of some members of political bodies on the role of state law in accelerating affordable development.

## All stakeholder groups report persistent post-entitlement challenges.

During interviews and meetings, *all* stakeholders, ranging from developers, architects, lawyers, and planners, complained of persistent challenges post-entitlement. Some of the dominant concerns related to the lack of uniformity in post-entitlement permitting. These stakeholders perceive that permitting depends on who is assigned to the process rather than on the form or

[98] In the November 15, 2022 hearing on the draft Housing Element, Supervisor Preston, for example, repeatedly stated that the aim of state law is to avoid providing more funding and to instead deregulate market-rate housing as the pathway to increase affordable development. *See S.F. Bd. of Supervisors: Hearing on the Draft Housing Element 2022* (Nov. 15, 2022) (statement of Dean Preston, Supervisor). Supervisor Preston shared these same perspectives in an open letter online, as well. Letter from Dean Preston, Supervisor, S.F. Bd. of Supervisors, to Gustavo Velasquez, Director, Cal. Dep't Hous. & Cmty. Dev. (Aug. 11, 2022), https://56a418ca-94d2-476c-9a45-f491ca4a0387.usrfiles.com/ugd/56a418_6abc98cb39f3429b85a1e3f2fb69fa17.pdf.

requirements of the development. Developers also commented that the system of review, itself, incentivizes extending review timelines. There is also no mechanism to escalate projects to someone with a higher position or a deeper understanding of what the projects require. The fact that there is priority review for affordable development is also negated by the fact that other developers can pay for priority review, so there is no true prioritization in the review process. Developers also shared that the subjectivity in the post-entitlement process can trigger a second stage of planning review even after the development has proceeded to the Department of Building Inspections.

Affordable developers were emphatic that state law, like SB 35, does nothing for post-entitlement challenges. All developers grapple with inadequate interagency coordination during the post-entitlement phase of development that creates duplicative review processes, delays, and inefficiencies. Interviews and meetings also suggest that affordable development may be most impacted. Developers attribute these problems to city departments lacking a production focus, and that no single person or department is sufficiently empowered to monitor the process. One stakeholder described post-entitlement as a “kickball game” with developers going back and forth between departments and personnel. Planners also described problems with permitting processes as at least in part due to a poorly structured operation that lacks adequate policy and transparency, so staff are unaccountable in the way that planning staff are held accountable. Developers shared similar perceptions. Stakeholders describe the lack of an intermediate administrator between DBI and the Building Inspection Commission (an administrator within the city’s executive branch) as a deficiency that contributes to inadequate coordination within and between departments.

Affordable developers shared significant difficulties with utilities processes for affordable development that led to extended periods of no power during and after construction. One developer characterized the San Francisco Public Utilities Commission (SFPUC) power requirements as “crippling” for affordable housing development. All developers expressed frustration with Pacific Gas & Electric (PG&E), generally, with some developers describing PG&E as monopolistic and engaged in “political retribution” with SFPUC by imposing infrastructure improvements or deprioritizing projects that go through the SFPUC. Affordable developers also report challenges with poor inter-agency coordination around meeting accessibility requirements, trouble with satisfying public art requirements, and difficulty meeting local hiring requirements because of labor shortages.

Nearly all participants offered their concerns about current efforts to address challenges with DBI and permitting. One frequent comment was that any directive to improve permitting processes (for example, by shortening permitting timelines) depends on having a baseline to make improvements from, but there is no baseline because there is poor data on permitting and no one has managed to track that information.

# Conclusion

We entered this research understanding that San Francisco’s entitlement timeframes were much longer than other jurisdictions. (The state’s Annual Progress Report Data Dashboard would later show that San Francisco self-reported the longest entitlement timeframes across the state.) What remained unclear was *why* retaining discretion over all development creates comparatively longer timeframes in San Francisco. Neighboring jurisdictions in the Bay Area also used discretionary review to approve all multifamily housing as well, but they did not take as long. Oakland, for example, retained discretion over all development of five or more units and

the median timeframe to approval was six months. Redwood City applied discretionary review to similar housing development and required *more* approval steps and the timelines were still shorter. Even entitlement in the City of Berkeley, which requires a use permit for any development, did not take as long as San Francisco. These are findings we could not explain because we did not dive into the details of how different discretionary pathways influenced approval outcomes or timeframes for specific types of multi-family housing.

Our earlier data also made it clear that San Francisco Planning prioritized 100% affordable developments—yet it was also true that affordable development did not move quickly, and the local regulatory environment was not hospitable to affordable housing despite staff efforts to quicken approvals for affordable development. In fact, our interviews from prior years signaled that even as San Francisco Planning prioritized 100% affordable development, local regulation, and local application of environmental review created risk that some affordable developers simply could not manage. Consistent with what interview and meeting participants shared, the 2014 - 2017 housing approvals data revealed there were only five 100% affordable developments entitled in those four years. Nearly three out of every four affordable housing units entitled in 2014 - 2017 depended on mixed-income development, or application of the city's inclusionary program to market-rate housing. It is important to note that before SB 35, increasing affordable housing production depended almost entirely on market-rate developers.

The data we have now, however, offers more insight into what parts of San Francisco's system generate comparatively longer timeframes and why. San Francisco, like so many other cities we have studied, continues to grapple with the consequences of inequitable land use policy from earlier decades. One of the primary tools San Francisco uses to redress past wrongs is process. Thus, like many other cities, San Francisco local law creates a procedural maze for housing entitlement through both zoning and aesthetic regulation. But what the data above tells us is that in San Francisco, the procedural maze is one with walls that move. Provisions within the Business and Tax Code and the city's Charter allow project opponents to repeatedly challenge approvals during and after planning review, and in some instances, impose new conditions of approval. No proposed housing development is immune under local law. This fosters a system of lengthy and repeated negotiations throughout and beyond entitlement.

The state asked whether San Francisco was fully implementing state housing law, and the data indicates that for the most part, the answer is no. This is true despite the diligent work of city personnel to facilitate housing approvals. What came through as a dominant theme in most interviews and meetings with developers was high regard for planning personnel combined with a heightened level of frustration with planning department processes. It was also clear that several Commissioners and Supervisors want to see more housing production, as well.

What exactly about local law blocks full implementation of state law that aims to simplify and quicken process? Stakeholders explained that the same rules which allow for repeated challenge to approvals, including post-entitlement approvals, are what invite subjective conditions of approval and constant negotiation outside of public hearings during the entitlement process. They also report that the risk of administrative appeal to local political bodies drives all planning practice, not just environmental planning practices—although environmental planning is particularly burdened. Though we found that most administrative appeals are withdrawn or denied, we heard that the beginning of an appeal creates more work for planning staff, which in turn changes the pace of all environmental planning review for all projects. All environmental determinations under CEQA occur near the end of the entitlement process (right before or at final entitlement). This practice seems to eviscerate the effects of PSA on timely approvals. If left as is, existing blanket discretionary review and planning practices will likely diminish the

effects of SB 330 as well, which targets excessive continuances and hearings, going forward. That suggests that addressing this problem requires scrutinizing both existing planning practice and the local administrative appeal process. According to most stakeholders we consulted, although many parts of San Francisco's local law need reform, the efficacy of any reform hinges on whether the city can revise its Business and Tax Code and Charter.

San Francisco's application of SB 35 yields the most insight into what legal reforms will likely expedite planning review. SB 35 changed San Francisco's application and intake process for qualifying development. Although the 2018 - 2021 data indicates that San Francisco's application intake process under local law was inconsistent with the PSA, the city regularly complied with SB 35's time constraints on planning review. When discussing what is needed to improve the housing approval pipeline in general, participants in confidential interviews shared that San Francisco needs a local ministerial process that parallels SB 35, to eliminate blanket discretionary review of all permits, thoughtful reform of local administrative appeal processes, and equitable rezoning in low density affluent areas. But no interview participant was optimistic that San Francisco could deliver on these reforms without state intervention in local power.

Also important—there was consensus among several stakeholder groups that communities within San Francisco have been harmed by the city's planning and zoning in the past, but no consensus on how the city should proceed going into the future. There was also no consensus between stakeholder groups, particularly between city staff and city officials, on what housing production would best serve the city's housing needs, on the role of local regulation in enabling or blocking housing production, the role of state law on facilitating housing production, and what the city should do to meet housing need *and* achieve spatial equity.

For example, planners and city personnel discussed the city's RHNA obligations when defining the city's housing problems. Planners described San Francisco land use policy with a wide lens, pulling in developer perspectives, neighborhood needs, and politics when discussing the effects of current policy and planning practice on production outcomes. Also notable, most city staff described how reforms could advance participation goals or spatial justice, but they also described individual policies and planning practices as pieces within a larger system that accounted for law, policy, and cyclical market conditions. Planners and city personnel offered detailed analysis of what is not working that was easy to verify using other data. City staff were clear that local legal reform would be the best solution, but also were not hostile to state laws that addressed some of San Francisco's procedural challenges.

Discussions with members of the political bodies responsible for developing and enacting the local legal reform were very different. All Commissioners and Supervisors agreed that the housing approval process was slow and needed improvement. One Supervisor even went so far as to describe San Francisco's entitlement process as difficult by design. Some Commissioners and Supervisors were also as pragmatic as staff offered robust explanations of how local regulation operates across the city, distinguishing between law and practice and explaining how politics influence planning practice and production outcomes. A few foregrounded specific and precise local legal reforms to support housing production citywide with sensitivity to equity and spatial justice within the city's existing policy framework and current market conditions. Some were deferential to planning staff as experts on what is needed in terms of procedural reform. Some were explicit in their support of program statements in the housing element that call for ministerial processes for at least some development.

But some political participants responded to questions about how policy and planning work within San Francisco with answers focused almost entirely on contributing factors to production

that were outside of the city's purview—like state funding for affordable housing. Some Commissioners focused most on how to improve implementation of the existing rules while retaining discretion in all planning review. There was also a split in how the Commissioners and Supervisors perceived state law, and the housing element process, as well. Some were explicit that they felt the state was penalizing San Francisco through the RHNA process, and that regulatory and practice reform would not resolve the challenges San Francisco is facing.

Thus, what the data also shows is that the primary gatekeepers to local policy reform do not agree with each other or city staff on the scope of San Francisco's housing need or on what the city must to do to meet that need. There is also no agreement on the relative importance of local regulation in creating, perpetuating, or ameliorating the city's housing problems.

**Appendix A: Regression Supplement With Methods**

In earlier writing, we found that longer timeframes within a city were not necessarily associated with more approval steps on average. But our analysis compared median timeframes and average local steps to entitlement in one city to another city. We did not explore the potential relationship between timeframes and local steps to entitlement in any single case study city. This analysis, within San Francisco only, is important because at least some procedural reform proposals assume that reducing steps to approval while maintaining discretionary review will shorten timeframes. At the same time, stakeholders describe San Francisco's regulations as creating variability and uncertainty in the approval process, even when a proposed development has few steps to approval.

Generally, within a single city, even if entitlement takes a long time overall, we expect that more approval steps extend timeframes. Theoretically, if a development conforms to existing planning and zoning and requires no local-level approvals, it should take less time than a development that requires one or more special approvals to secure entitlement. San Francisco's local law does provide for dense residential buildings in some neighborhoods, without any special approvals. San Francisco's law also allows dense residential housing in other neighborhoods but with required special approvals. For example, development over a specific height threshold in some areas requires a Conditional Use Authorization or Large Project Authorization. If the local law is operating as we think it should, planning review might take longer when a development requires a Conditional Use Authorization before a building permit than if the development requires only a building permit. Finally, when a property owner proposes development that requires a rezoning or General Plan Amendment, it might take even longer than a project requiring a Conditional Use Authorization because what the developer is proposing is not provided for in existing planning and zoning.

But what we have heard within interviews so far is that this is not how local planning and zoning operates in practice. Most stakeholders described a process where neighbors may oppose any proposed development in any context, and planners are placed in a position of mediating disputes. Because of this, the time to entitlement (and certainty of approval) is unpredictable for all development subject to discretionary review, whether a project conforms to the local planning and zoning or not.

Stakeholders describe informal and formal pre-application processes for initial outreach and meetings to help planners, and the property owners anticipate neighborhood reaction and adjust a proposed development before proceeding through the entitlement application process. They also described a process where planners worked to mediate and resolve potential conflicts before proposals went in front of approval bodies (like the Planning Commission).

But stakeholders also note that although a property owner may begin negotiations with neighbors before the application (and in cases where the Planning Department requires a Preliminary Project Assessment, sometimes before that process), and continue negotiations throughout planning review, project opposition may not manifest until late in the process. They emphasized that smaller buildings are most vulnerable. Therefore, no matter what work the planners and property owners put into anticipating and mediating disputes over proposed projects, the process allows the risk of opposition for new, sometimes unpredictable, reasons to remain. Because opposition can emerge at any time, stakeholders say this makes the timeframes and approval outcomes uncertain.

These statements suggest that we should explore the entitlement data to see if entitlement for code compliant development is associated with shorter timeframes as compared with entitlement that requires special approvals or deviates from planning and zoning. Theoretically, code-consistent development should always move faster. One way we do this is to explore relationships between local steps to entitlement and timeframe to entitlement. If longer timeframes are associated with more approval steps, then policy proposals that focus on eliminating or consolidating approval process steps to expedite housing approvals should help shorten timeframes. But if more approval steps are not associated with longer timeframes, this means that something else is occurring to lengthen timeframes. If that is true, reducing the number of discretionary approval steps, alone, may not resolve the uncertainty and unpredictability stakeholders describe. **Although analyzing our entitlement dataset using regression cannot "prove" or "disprove" what stakeholders have shared, this additional analysis allows us to use more than one method and multiple data points for insights, which is more reliable than relying on only one method or data point.**

We chose to run linear regression models, rather than probability models, because we are interested in understanding what drives project timeframes in San Francisco—not necessarily what drives extreme delays within the context of San Francisco's regulatory environment. If we used a probability model, we would need to generate a binary variable as the dependent variable in our analysis. This variable would distinguish observations that are delayed (in terms of the project timeframe). San Francisco's extraordinarily long entitlement timeframes make this very difficult. For example, generating a binary cutoff for delayed timeframes at the median would lead to a cutoff of 39 months. That means we would be defining observations with incredibly long timeframes as "not delayed" because they were below this median, and then using the probability model to see whether certain factors generate delays beyond 39 months. Since most discretionary projects in San Francisco are delayed, even if they are delayed for less than 39 months, a probability model with a binary dependent variable is not best suited for our analysis. Also, that model would ignore project factors that are associated with two- or three-year timeframes because it would classify these projects as "not delayed."

## Regression Analysis Using 2018 – 2021 Data (OLS Models)

We first analyze the existing associations between local land use approvals[99] required for entitlement in 2018 - 2021 and project timeframes using a multivariable, Ordinary Least Squares Regression (OLS). First, we ran a simple, OLS regression using local land use approval steps as the single independent variable, and timeframes as the dependent variable.

We used the statsmodel Python module to run all regressions in this analysis. We calculated all regression coefficients with robust standard errors (Errors of Order 3 (HC3)) to account for the existence of outliers and other issues within the data such as heteroskedasticity (variation in regression errors across our observations) and provide a small sample correction. Note that if we did not use robust standard errors with a small sample and clustered observation correction, the standard errors of our estimates would be smaller, so the standard errors and subsequent hypothesis testing are conservative.[100]

We observe a positive association between approval steps and timeframes. Interpreting the results of this simple regression, an additional approval step is associated with approximately a four-month increase in timeframes. While this positive association exists, our data suggests that observations with little to no local land use steps can take a long time. From this simple regression, we expect a development requiring a discretionary building permit only to take 32 months. Further, out of the 64 observations with less than a single local land use approval step, 23 observations (~36%) are above the mean (~38.6 months) and 26 observations (~41%) are above the median (~34.9 months) timeframe in San Francisco. While this positive association exists, timeframes are variable, regardless of the number of approval steps.

Even if such a relationship between local land use approval steps and timeframes exists, the magnitude of the relationship is, arguably, small. Meaning, the impact of approval steps on timeframes is small. From this simple regression, an additional approval step is associated with an additional ~3.7 months for approval. Given that the mean timeframe for all 111 observations is ~38.56 months, the impact of an additional approval step on timeframes is minimal.

[99] We define local land use approval steps as any discrete approval step required for entitlement under local law, not including the California Environmental Quality Act (CEQA) compliance pathway step.
[100] In regression analysis, the errors are defined by the difference between the observed values of the dependent variable (in this case, project timeframes) and values predicted by the regression specification. Accurate estimation of the uncertainty of OLS-predicted values generally depends on constant errors across observations. However, in this study, we do not assume that error is constant (homoscedasticity). For instance, model error might be larger for observations with substantially longer timeframes (i.e., where projects take two to three times longer than the median timeframe). When we use robust standard errors, we no longer assume that errors are constant across all observations, which can mitigate the impacts of this regression analysis being based on observational data. Further, we are using a small sample correction to mitigate the fact that our universe of observations is relatively narrow and to account for the natural clustering in timeframes that occurs at each local land use approval step.

*Figure 6: Regression 2018 - 2021 Observations (No Controls)*

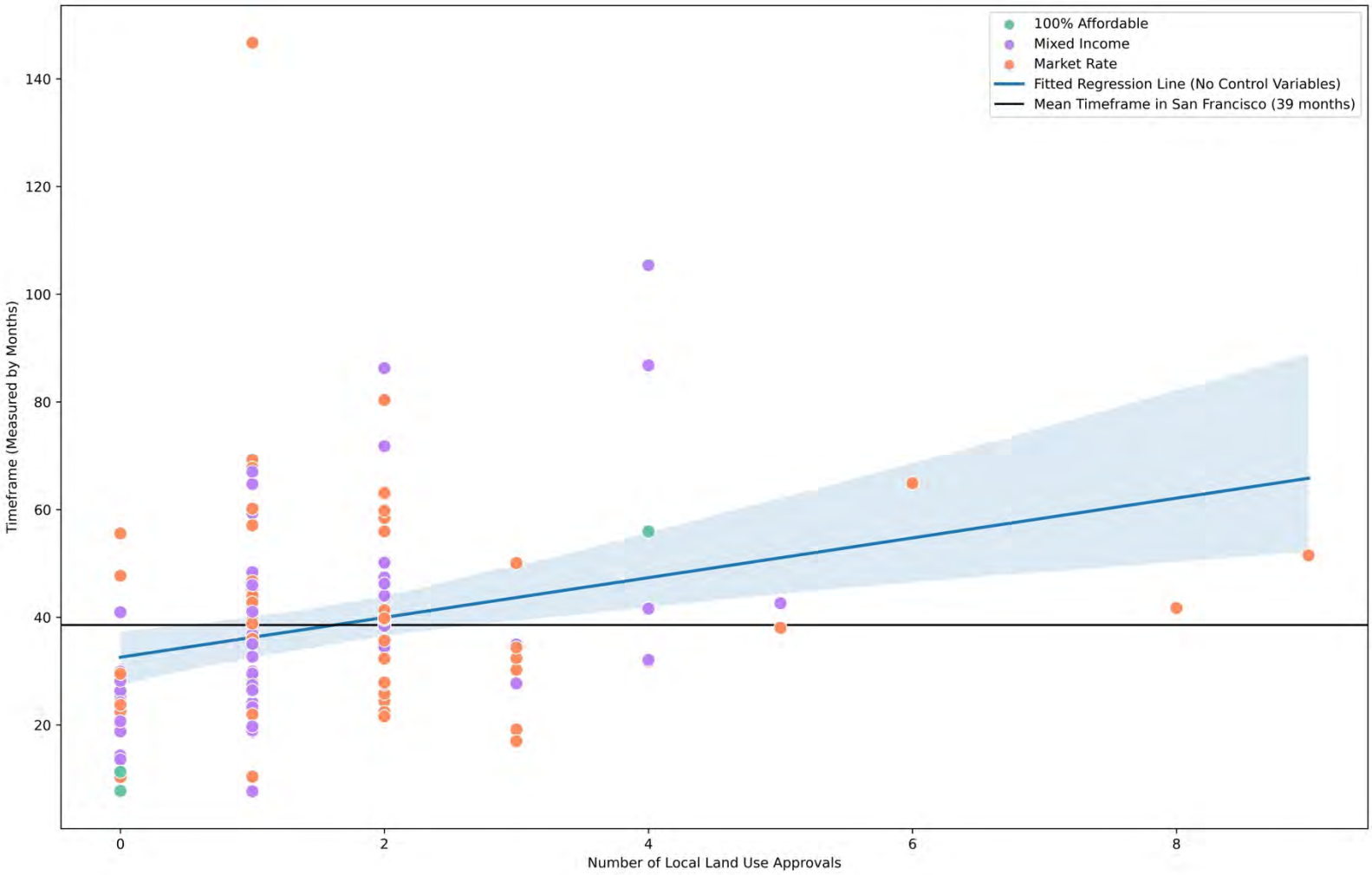



Figure 6 depicts the simple regression of time frames on local land use approval steps. In this graph, the translucent bounds represent the confidence interval for the regression line. Several observations, however, fall outside the bounds of the confidence interval for the regression line. The confidence interval indicates the uncertainty in our regression estimates. This uncertainty could suggest model misspecification.[101] More specifically, the number of approval steps does not adequately capture the variation in project timeframes. **This model misspecification could suggest that there are unaccounted variables that influence the existing relationship between the number of approval steps and timeframes.**

[101] A large confidence interval is also often a function of sample size. In other words, because of a limited amount of data, our regression estimates are uncertain. However, we capture a complete dataset of all discretionary, non-ADU entitlements greater than five or more units in 2018 - 2021. Because of this, we are not making statistical inferences based on a sample, but rather generating quantitative analysis on an entire population (and interpreting our results within the context of this population only). Therefore, theoretically, there is no statistical uncertainty through sampling uncertainty.

We controlled for project characteristics that based on interviews and meetings we assumed might influence the relationship between timeframes and the number of local land use approvals. One such example is affordability thresholds. We heard from planners, Commissioners, and Supervisors that the city wants to prioritize 100% affordable development. To control for affordability, we placed the 111 observations into three categories: market-rate, mixed-income, and 100% affordable. To avoid perfect multicollinearity, we did not include the indicator variable which controls for observations that are market-rate. However, due to the model specification, we are still controlling for all affordability classifications in our regression. Below is the distribution of all 111 discretionary observations, by affordability classification:

1) Market-Rate **(N=55)**
2) Mixed-Income **(N=52)**
3) 100% Affordable **(N=4)**

We also controlled for local process characteristics related to the intensity of the approval process—which is distinct from whether an approval process requires more steps. What we are referring to here is how a project proponent may seek only a Variance, or only a Conditional Use Authorization (CUA), or only a Large Project Authorization—and each may require one approval step, but these approval processes are quite different in terms of what we describe as process intensity. A Variance in San Francisco usually requires approval from the Zoning Administrator without a public hearing (though the public may request a public hearing in front of the Planning Commission through the exceptional Discretionary Review process). A Conditional Use Authorization and Large Project Authorization always requires a hearing in front of the Planning Commission. Interviews reveal, however, that the Planning Commissioners interpret the Housing Accountability Act as not applicable to Large Project Authorizations—and that they have the discretion to deny the Large Project Authorization.

Therefore, we wanted to explore whether the *type* of approval process—not necessarily the number of local land use approval steps—is what influences increases in timeframes. We identified five distinct process categories: Discretionary Building Permit, Variance, CUA & PUD, Large Project Authorizations and Downtown Project Authorizations, and Legislative Actions. We want to explore whether observations with a more intense process are associated with longer timeframes and, theoretically, more approval steps. Below is the distribution of all 111 discretionary observations, by process category:

1) Discretionary Building Permit (**N=23)**: The building permit category represents a group of observations that are only discretionary by virtue of the Business & Tax Code provision that renders all government approvals discretionary.

2) Variance Only (**N=17**): These are observations that required a variance for approval. The observations do not require any Conditional Use Authorizations, Large Project Exceptions, or Legislative Actions.

3) CUA & PUD (**N=49**): These are observations that required a Conditional Use Authorization or Planned Unit Development (PUD) Approval. The observations do not require any Large Project Exceptions or Legislative Actions.

4) Large Project Authorizations and Downtown Project Authorizations **(N=15)**: These are observations that required either a Downtown Project Authorization or Large Project Authorization. Interviews and meetings indicate that Large Projects face significant hurdles—because they are disfavored. The issue here though is that these large projects may only require one step, and they theoretically seem to be no different than a CUA if we only consider the process in terms of both the number of approval steps and the approval body. However, the procedural step allows for waivers or exceptions to allow for a large project under the planning code. Though these do not appear to require legislative action, interviews suggest that the Planning Commission eschews these approvals, believes that they are not covered by the Housing Accountability Act, and will deny these approvals. That the Planning Commission interprets the Housing Accountability Act as not applying to the LPAs is something planners dispute, as they think this is a faulty interpretation of state law.

5) Legislative Actions (**N=7**): These are observations that required a local legislative act (Planning Code Amendment, Zoning Map Amendment, General Plan Amendment, or Development Agreement) for approval.

To assess the impact of process intensity on approval steps, we translated process intensity and incremental numeric ranking in the following order: Discretionary Building Permit (least intense), Variance Only, CUA & PUD, Large Project Authorizations and Downtown Project Authorizations (referred to collectively as Exceptions), Legislative Actions (most intense). After running a simple regression of the number of approval steps on this numeric ranking, we find increasing process intensity is associated with an increase of one approval step (rounded).[102] A project that requires a local legislative act or a development agreement for approval is expected to have three to four more approval steps than a discretionary building permit project. This makes sense, as Development Agreements are often associated with proposals that require multiple approvals. This association is statistically significant at the 1% level. While process intensity and the number of local land use approval steps are related, they are not multicollinear. The correlation coefficient between the numeric translation between process intensity and local land use approval steps is 0.63. In an additional section of this report, we run a correlation heatmap between all independent variables to identify any possible sources of multicollinearity.

We also calculate the variation in the number of approval steps for all process categories. Below is a table that breaks out the quantile distribution of approval steps, by process intensity.

[102] The slope coefficient in the simple regression 0.856.

*Table 16: Variation in Number of Approval Steps, by Process Categories, Non-ADU Discretionary Observations 2018 - 2021 (N=111)*

| Process Categorization | Min. Steps | 25th Percentile Steps | **Median Steps** | 75th Percentile Steps | Max. Steps | **Mean Steps** | Standard Steps |
|---|---|---|---|---|---|---|---|
| Discretionary Building Permit (N=23)[103] | 0 | 0 | **0** | 0 | 2 | 0.13 | 0.46 |
| Variance (N=17)[104] | 1 | 1 | **1** | 1 | 3 | 1.29 | 0.59 |
| CUA & PUD (N=49)[105] | 1 | 1 | **2** | 2 | 4 | 1.96 | 0.96 |
| Exceptions (N=15)[106] | 1 | 1 | **1** | 2 | 5 | 1.60 | 1.12 |
| Legislative Acts (N=7)[107] | 1 | 3 | **5** | 7 | 9 | 5 | 2.94 |

We highlight this variation to show that process categorizations are not just a categorical grouping of the number of local land use approval steps. For instance, all process categorizations have observations that require a single approval step. However, an observation that requires only a variance is significantly different from an observation that requires only a Large Project Exception. It is because these single approval step processes are so different that we control for process in our analysis.

Finally, we also control for project size and whether the observation was in a vulnerable area. Interviews suggest that larger projects are disfavored. We control for project size (instead of just an LPA or DPA) because some proposed developments benefit from State Density Bonus Law, increasing their size, but they do not necessarily require an LPA or DPA (which is determined in part by location as well). Lastly, we control for location within a priority equity geography because interviews suggest political bodies are sensitive to proposals to build in these areas. These project and neighborhood characteristics can also impact the relationship between local land use approval steps and timeframes.

We completed several regression models to explore whether there is a relationship between number of approval steps and timeframes. Or in other words, does increasing the number of required approval steps create longer entitlement timeframes? **The regression models show that when we control for affordability characteristics, project size, location within a vulnerable geographic area, and intensity of the approval process, there is no**

[103] Out of the 23 discretionary building permit observations, one observation had an additional administrative approval. Another observation required an additional administrative approval and a Certificate of Appropriateness for approval.
[104] There are 13 observations that require only one step or only a variance for approval.
[105] There are 18 observations that require only one step, or only a CUA or PUD for approval.
[106] There are 10 observations that require only one step, or an exception (Downtown Project Authorization or Large Project Authorization) for approval.
[107] There is one observation that required only a legislative act for approval.

**statistically significant association between the number of approval steps and timeframes.**

This outcome supports what stakeholders say to be true in San Francisco—factors outside of law influence timeframes, and there is a lot of uncertainty of how entitlement will unfold in San Francisco no matter what a developer proposes to build. This outcome does not prove that there is no causal relationship between timeframes and approval steps; we cannot account for all confounding variables that influence this relationship. OLS identifies associations within our data only. And we are using observational data, as well. Thus, the data and methods do not allow us to prove or disprove that there is no relationship between number of approval steps and timeframes. **But importantly, the regression findings are consistent with what descriptive statistics and interviews both show—there is no easy entitlement pathway in San Francisco, and factors outside of law appear to influence entitlement outcomes. This tells us that reforms that focus on simplifying discretionary review by reducing the number of steps to approval may be insufficient to address uncertainty and lengthy timeframes to approval.**

## Discretionary Non-ADU Observations 2018 - 2021 with Controls

Table 17 below shows the association between local land use approval steps and timeframes was numerically smaller and no longer statistically significant after we controlled for affordability, process intensity, and project size. These results indicate that there are factors outside of what the planning and zoning law requires of developers that strongly affect the relationship between approval steps and timeframes.

What Table 17 illustrates is that project size may impact the relationship between approval steps and timeframes in our dataset. When controlling for number of approval steps to understand the relationship between project size and timeframes, an additional unit increase in project size is associated with a 0.021 month increase in timeframes. This relationship is statistically significant at the 5% level.

Another factor that may impact the relationship between approval steps and timeframes is the intensity of the process. An observation requiring a variance or CUA/PUD is associated with an increase in timeframes, relative to a discretionary building permit observation. This relationship is diminished (in terms of significance) but is still present when we add controls. Further, an approval requiring a Large Project Authorization is associated with an increase in timeframes, relative to a discretionary building permit observation—but this association is no longer statistically significant when we add all controls (including project size).

*Table 17: All Discretionary Non-ADU Observations 2018 - 2021*

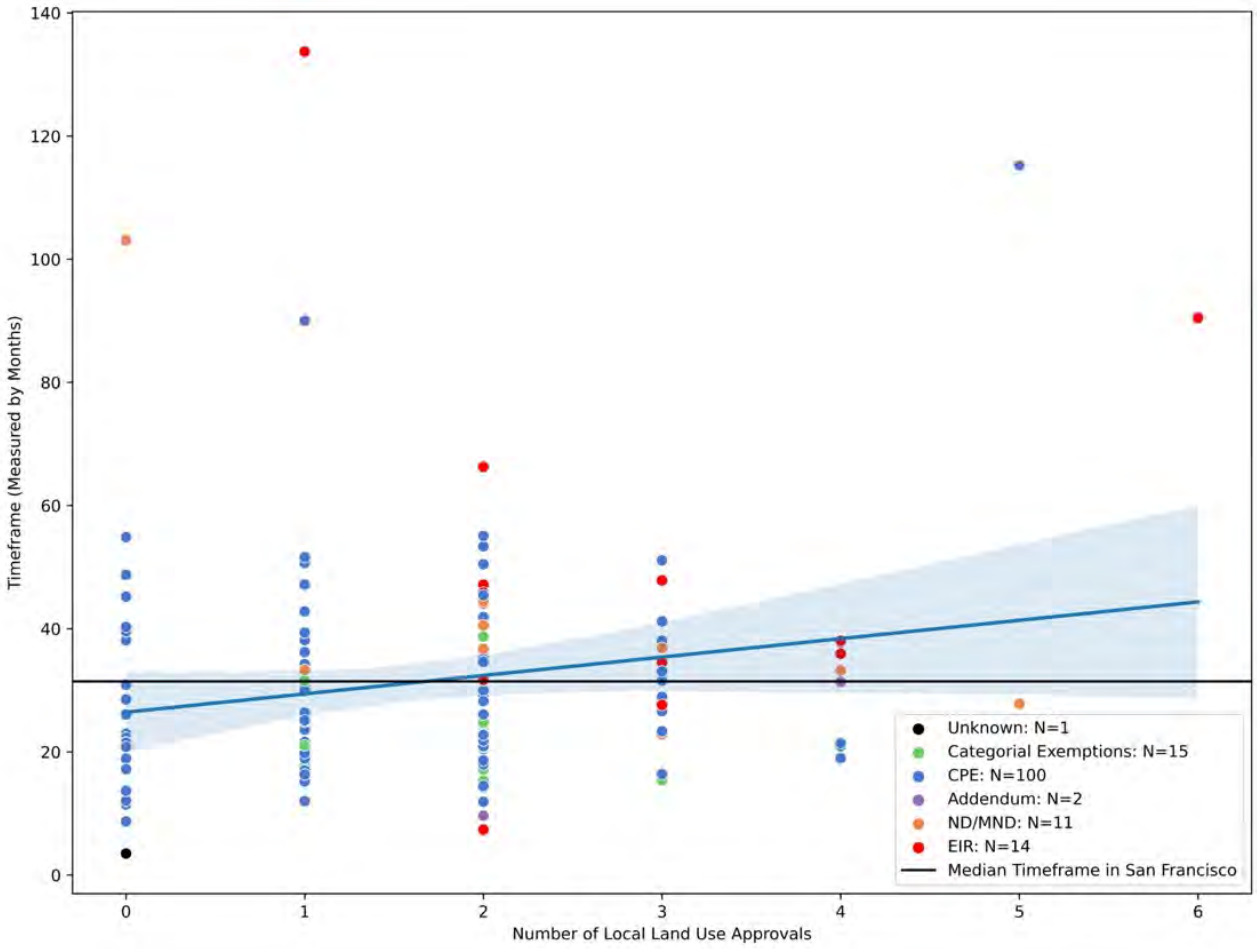
| Variables | No Controls | Affordability Controls | Neighborhood Controls | Size Controls | Process Controls | All Controls |
|---|---|---|---|---|---|---|
| **Dependent Variable:** Timeframe (denoted in months) | | | | | | |
| Num. Approvals | 3.693*** | 3.681*** | 3.743*** | 2.794** | 2.761* | 2.360 |
| | (1.244) | (1.353) | (1.260) | (1.117) | (1.637) | (1.755) |
| Market-rate | | 12.706 | | | | 4.160 |
| | | (9.493) | | | | (8.372) |
| Mixed Income | | 12.934 | | | | 6.833 |
| | | (9.242) | | | | (8.970) |
| Vulnerable Area | | | 1.584 | | | 1.307 |
| | | | (3.860) | | | (4.331) |
| Project Size | | | | 0.021** | | 0.028** |
| | | | | (0.011) | | (0.013) |
| Variance | | | | | 19.468** | 20.488** |
| | | | | | (8.799) | (9.149) |
| CUA & PUD | | | | | 12.286*** | 11.115** |
| | | | | | (4.092) | (4.547) |
| Exceptions | | | | | 9.987* | 6.653 |
| | | | | | (5.317) | (6.152) |
| Legis. Acts | | | | | 6.467 | 0.558 |
| | | | | | (9.207) | (11.431) |
| Constant | 32.580*** | 20.246** | 31.714*** | 32.369*** | 23.930*** | 17.656** |
| | (2.653) | (8.889) | (2.854) | (2.587) | (2.567) | (7.260) |
| Observations | 111 | 111 | 111 | 111 | 111 | 111 |
| R-squared | 0.075 | 0.088 | 0.076 | 0.094 | 0.157 | 0.197 |
| Adj. R-Squared | 0.066 | 0.063 | 0.059 | 0.077 | 0.117 | 0.126 |

Notes: *** indicates coefficient is significant at the 1% level. ** indicates coefficient is significant at the 5% level. * indicates coefficient is significant at the 10% percent level. Table presents robust standard errors in parentheses.

## Regression Analysis Using 2014 - 2017 Data

After running a simple regression on approval steps and timeframes using the 2014 - 2017 dataset, we find a positive association between approval steps and timeframes. This association is not statistically significant. In terms of magnitude, the association between local land use approval steps within the 2014 - 2017 dataset is weaker than in the 2018 - 2021 dataset.

*Figure 7: Ordinary Least Squares Regression 2014 - 2017 Observations (N=140)*



We also run our regressions on observations that received a Community Plan Exemption (N=100).
We did this to further explore whether local approval steps impact timeframes for projects that satisfy CEQA in the same way.

*Table 18: Regression Using 100 CPE Observations 2014 - 2017*

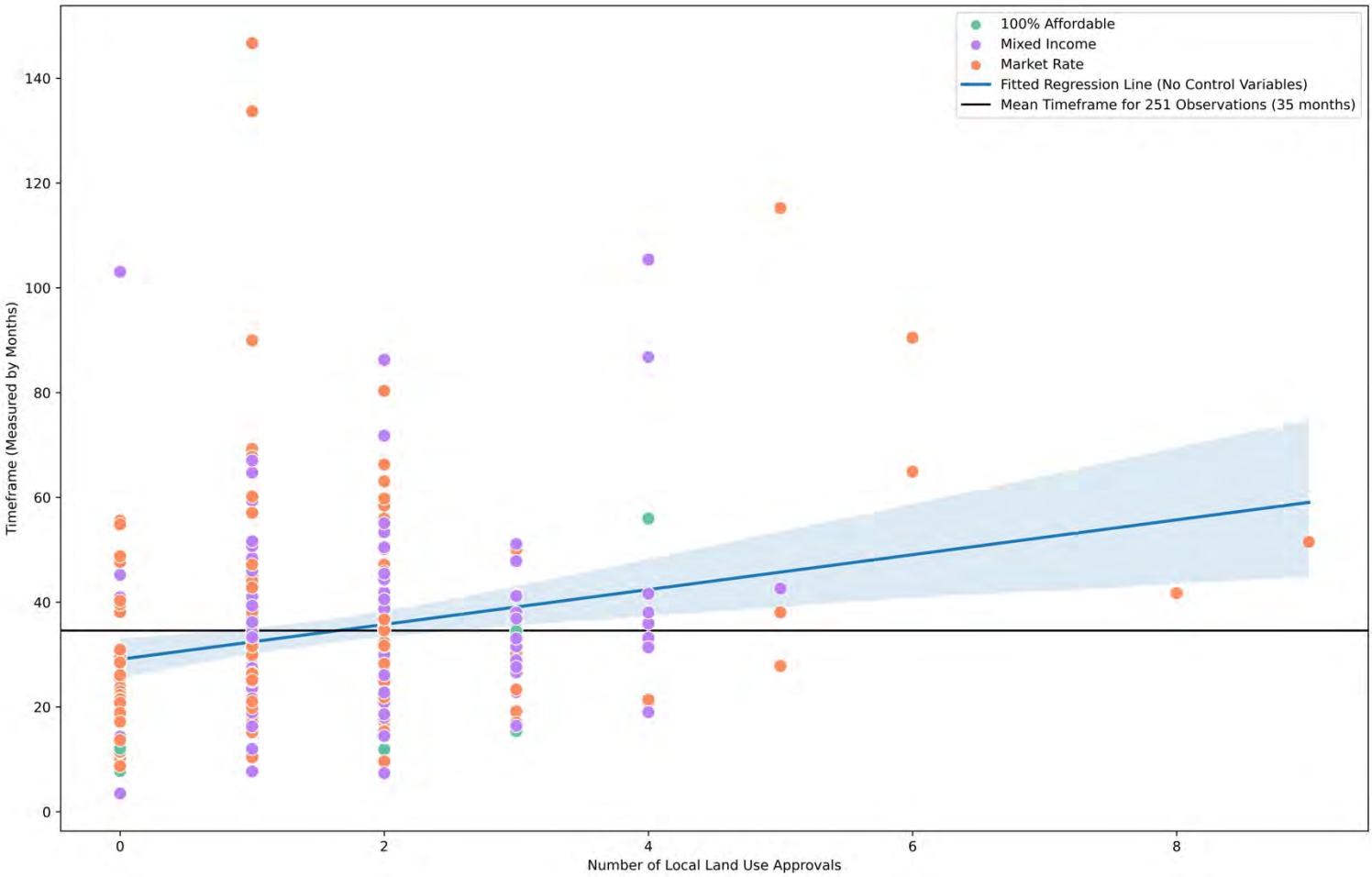
| Variables | No Controls | Affordability Controls | Neighborhood Controls | Size Controls | Process Controls | All Controls |
|---|---|---|---|---|---|---|
| **Dependent Variable:** Timeframe (denoted in months) | | | | | | |
| Num. Approvals | 3.295 | 3.521 | 3.009 | 4.097 | 4.062 | 2.515 |
| | (2.740) | (3.802) | (2.731) | (2.615) | (7.615) | (6.105) |
| Market-rate | | 15.159*** | | | | 22.226 |
| | | (5.177) | | | | (19.833) |
| Mixed Income | | 12.443* | | | | 23.791 |
| | | (6.614) | | | | (19.983) |
| Vulnerable Area | | | -2.478 | | | -1.423 |
| | | | (3.184) | | | (3.265) |
| Project Size | | | | -0.019 | | 0.002 |
| | | | | (0.022) | | (0.028) |
| Variance | | | | | 4.305 | 3.071 |
| | | | | | (9.589) | (9.902) |
| CUA & PUD | | | | | -5.188 | -6.306 |
| | | | | | (10.667) | (10.416) |
| Exceptions | | | | | -4.053 | -3.885 |
| | | | | | (19.060) | (17.804) |
| Legis. Acts | | | | | 10.918 | 20.784 |
| | | | | | (34.670) | (35.476) |
| Constant | 24.966*** | 11.406** | 26.813*** | 25.232*** | 25.700*** | 6.351 |
| | (3.513) | (5.124) | (4.363) | (3.667) | (2.779) | (19.031) |
| Observations | 100 | 100 | 100 | 100 | 100 | 100 |
| R-squared | 0.055 | 0.086 | 0.061 | 0.061 | 0.119 | 0.196 |
| Adj. R-Squared | 0.046 | 0.057 | 0.042 | 0.042 | 0.072 | 0.092 |

Notes: *** indicates coefficient is significant at the 1% level. ** indicates coefficient is significant at the 5% level. * indicates coefficient is significant at the 10% percent level. Table presents robust standard errors in parentheses.

## Regressions Using 2014 - 2021 Data

We ran our regression models on the entire 2014 - 2021 dataset. We find no differences in our main findings above. Figure 3 depicts the simple regression of time frames on local land use approval steps. We found a positive association between number of approval steps and timeframes that is statistically significant. In this graph, the translucent bounds represent the confidence interval for the regression line. As was true in the regression of 2018 - 2021 data only, several observations fall outside the bounds of the confidence interval for the regression line. The confidence interval indicates the uncertainty in our regression estimates. This uncertainty suggests that there are other unaccounted variables that influence the existing relationship between the number of approval steps and timeframes.

*Figure 8: Regression All Non-ADU Discretionary Observations 2014 - 2021 (No Controls)*



Our results using the 2014 - 2021 dataset also show that when we control for affordability characteristics, project size, location within a vulnerable geographic area, and intensity of the approval process, there is no statistically significant association between the number of approval steps and timeframes.

We also add an additional model where we only exclude process controls. We find that there exists a positive, statistically significant association between approval steps and timeframes when we only control for affordability, project size, and area characteristics, but this relationship is numerically smaller and decreases in statistical significance when we add these controls.

*Table 19: Regression All Discretionary Non-ADU Observations 2014 - 2021 With Controls*

| Variables | No Controls | Affordability Controls | Neighborhood Controls | Size Controls | Process Controls | All Controls Except Process Controls | All Controls |
|---|---|---|---|---|---|---|---|
| | **Dependent Variable:** Timeframe (denoted in months) | | | | | | |
| Num. Approvals | 3.328*** | 3.363*** | 3.149*** | 2.882*** | 2.998** | 2.643** | 2.263 |
| | (1.019) | (1.034) | (0.990) | (1.043) | (1.470) | (1.046) | (1.453) |
| Market-rate | | 14.441*** | | | | 13.854*** | 11.718** |
| | | (4.756) | | | | (5.168) | (5.446) |
| Mixed Income | | 12.003*** | | | | 11.610** | 10.510* |
| | | (4.539) | | | | (4.933) | (5.497) |
| Vulnerable Area | | | -3.878 | | | -3.577 | -3.798 |
| | | | (2.494) | | | (2.574) | (2.588) |
| Project Size | | | | 0.009 | | 0.012 | 0.016 |
| | | | | (0.010) | | (0.010) | (0.011) |
| Variance | | | | | 10.836* | | 10.407* |
| | | | | | (5.620) | | (5.763) |
| CUA & PUD | | | | | 4.266 | | 3.413 |
| | | | | | (3.793) | | (4.122) |
| Exceptions | | | | | 0.859 | | -0.183 |
| | | | | | (4.628) | | (5.428) |
| Legis. Acts | | | | | 5.815 | | 4.783 |
| | | | | | (8.056) | | (9.030) |
| Constant | 29.094*** | 16.346*** | 31.460*** | 28.968*** | 26.008*** | 18.847*** | 17.794*** |
| | (2.013) | (4.357) | (2.548) | (2.026) | (2.466) | (4.943) | (5.063) |
| Observations | 251 | 251 | 251 | 251 | 251 | 251 | 251 |
| R-squared | 0.052 | 0.070 | 0.061 | 0.055 | 0.080 | 0.082 | 0.109 |
| Adj. R-Squared | 0.048 | 0.059 | 0.053 | 0.047 | 0.062 | 0.063 | 0.076 |

Notes: *** indicates coefficient is significant at the 1% level. ** indicates coefficient is significant at the 5% level. * indicates coefficient is significant at the 10% percent level. Table presents robust standard errors in parentheses.

It is not typical for a development to have eight to nine steps to entitlement in San Francisco. Because it is possible that the relationship between approval steps and timeframes is driven by atypical projects in San Francisco (or observations that require eight or nine steps for approval), we also analyze the impact of outliers (in terms of the number of approval steps) on the relationship between approval steps and timeframes. Any observation in our discretionary, non-ADU dataset from 2018 - 2021 with more than four approval steps is considered an outlier.[108] We dropped these from our dataset and reran our regression models in the table below.

*Table 20: Regression Results, Dropping Approval Step Outliers (2014 - 2021 Data)*

| Variables | No Controls | Some Controls | All Controls |
|---|---|---|---|
| Dependent Variable: Timeframe (denoted by months) | | | |
| Num. Approvals | 1.987* | 1.685 | -0.756 |
| | (1.133) | (1.309) | (1.928) |
| Market-rate | | 17.294*** | 14.218*** |
| | | (3.723) | (3.982) |
| Mixed Income | | 15.522*** | 12.450*** |
| | | (3.397) | (4.428) |
| Vulnerable Area | | -1.829 | -2.090 |
| | | (2.666) | (2.683) |
| Project Size | | 0.006 | 0.010 |
| | | (0.012) | (0.013) |
| Variance | | | 13.440** |
| | | | (6.072) |
| CUA & PUD | | | 6.949 |
| | | | (4.802) |
| Exceptions | | | 7.935 |
| | | | (5.780) |
| Legs. Acts | | | 9.840 |
| | | | (7.396) |
| Constant | 30.585*** | 15.720*** | 15.110*** |
| | (2.205) | (3.880) | (4.142) |
| Observations | 229 | 229 | 229 |
| R-squared | 0.010 | 0.041 | 0.075 |
| Adj. R-Squared | 0.005 | 0.020 | 0.037 |

Notes: *** indicates coefficient is significant at the 1% level. ** indicates coefficient is significant at the 5% level. * indicates coefficient is significant at the 10% percent level. Table presents robust standard errors in parentheses

[108] We calculated the bounds for large outliers (based on the number of approval steps) with the following formula: 1.5 * [75% Percentile – 25% Percentile] + 75% Percentile. For all 251 observations, the 25% percentile is one approval step and the 75$^{th}$ percentile is two approval steps. Using this formula, 1.5 * (2 – 1) + 2 = 3.5. Meaning, any observations with more than four approval steps are outliers.

We observe a positive association between approval steps and timeframes when we discard outlier observations, although this association is numerically smaller and decreases in statistical significance. When we exclude process controls in our regression—and only control for affordability, project size, and neighborhood characteristics—we find no statistically significant association between approval steps and timeframes. This suggests that the observations which required significantly more steps for approval play a role in the association between approval steps and timeframes. In other words, when we discard these observations to generate a dataset of more typical developments in San Francisco, we find no statistically significant association between approval steps and timeframe, controlling for factors outside of planning and zoning law. This also suggests that a more typical observation (an observation with two or three steps) would likely see no substantial difference in timeframe if it have been approved with fewer steps.

## Robustness Checks for Analysis

We generated correlation heat maps to understand existing associations between the independent variables in our models. If high correlations exist between our independent variables, it could lead to imperfect multicollinearity.

In the following correlation heat maps, the only variables that are highly associated with each other are indicator variables that are mutually exclusive and exhaustive. As a result of these heatmaps, we feel comfortable using these variables as independent variables in our regression.

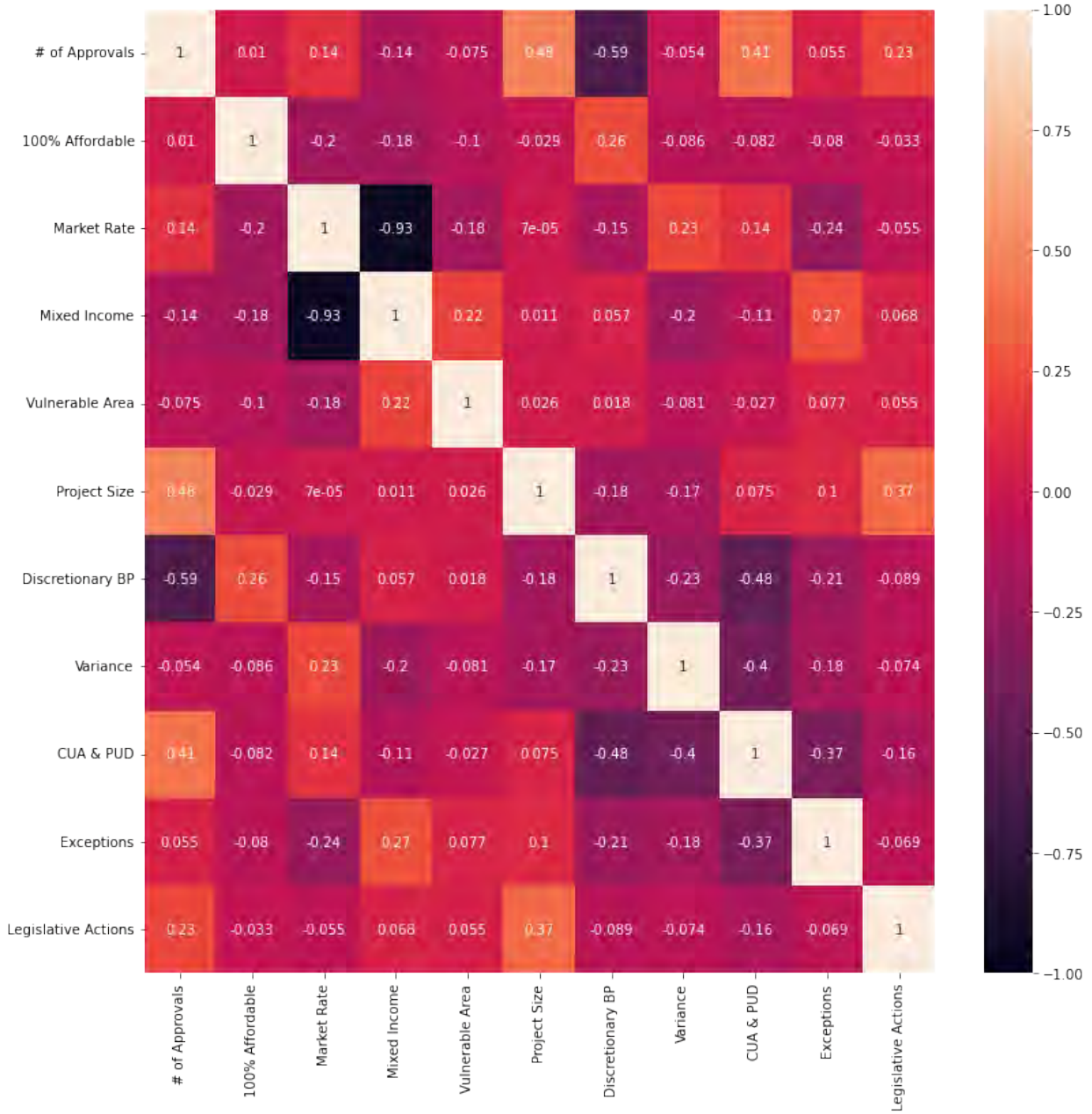



*Figure 9: Correlation Heat Map for 2018 - 2021 Regression Data (N=111) with Affordability, Neighborhood, and Process Characteristics*

Residual Plots for Regressions

We also run residual plots for some of our models for assessment. First, we use the residual plots to assess our model's functional form (e.g., is the association between the number of approval steps and timeframes linear?). We also use residual plots to assess the effectiveness of our control variables. We are interested in understanding if the introduction of these control variables help capture the underlying associations within our data.

*Figure 10: Residual Plot and LOESS Line for Simple Regression ("No Controls" in Table 1) Using All 111 Non-Discretionary Non-ADU Observations 2018 - 2021*

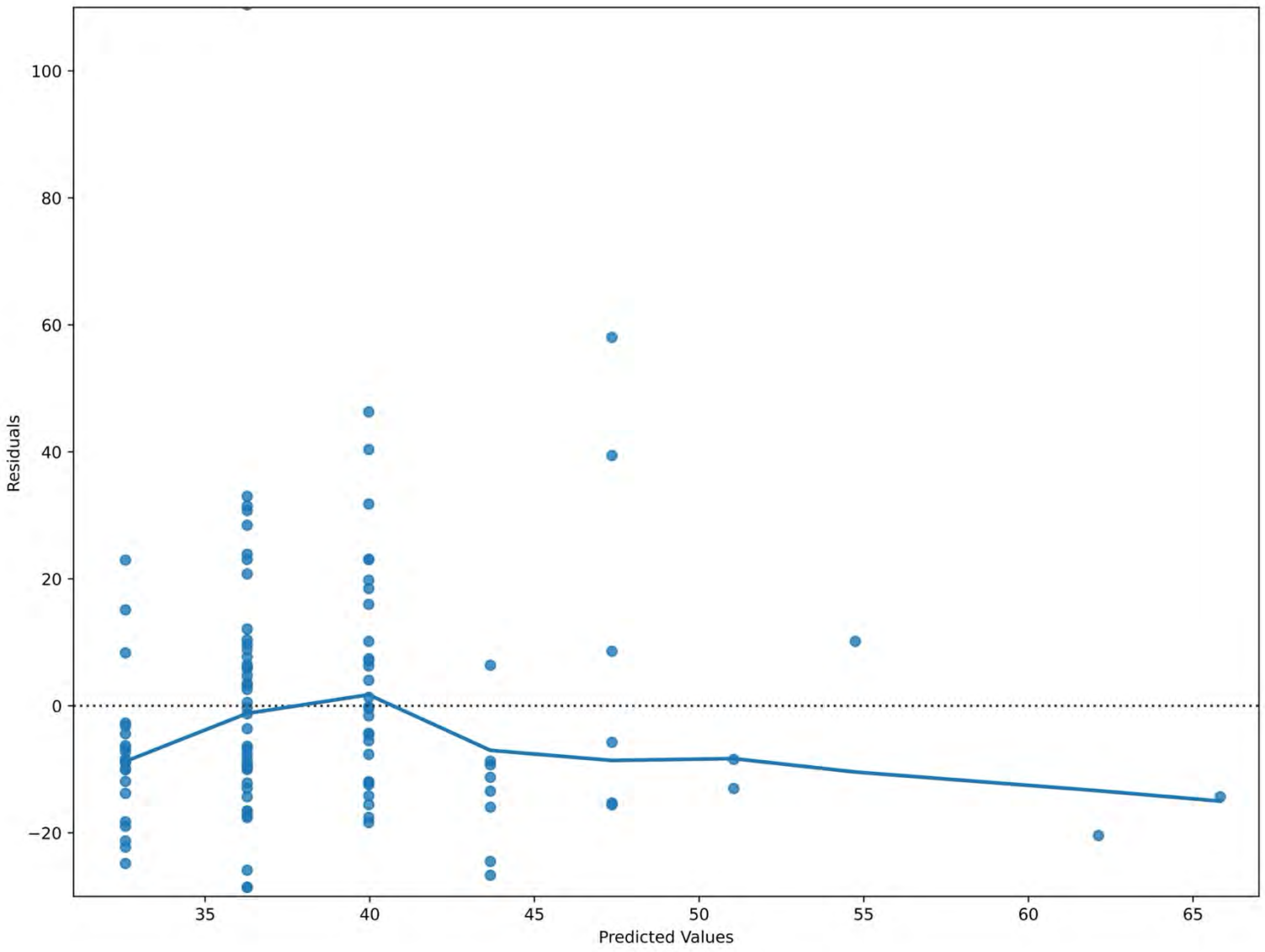
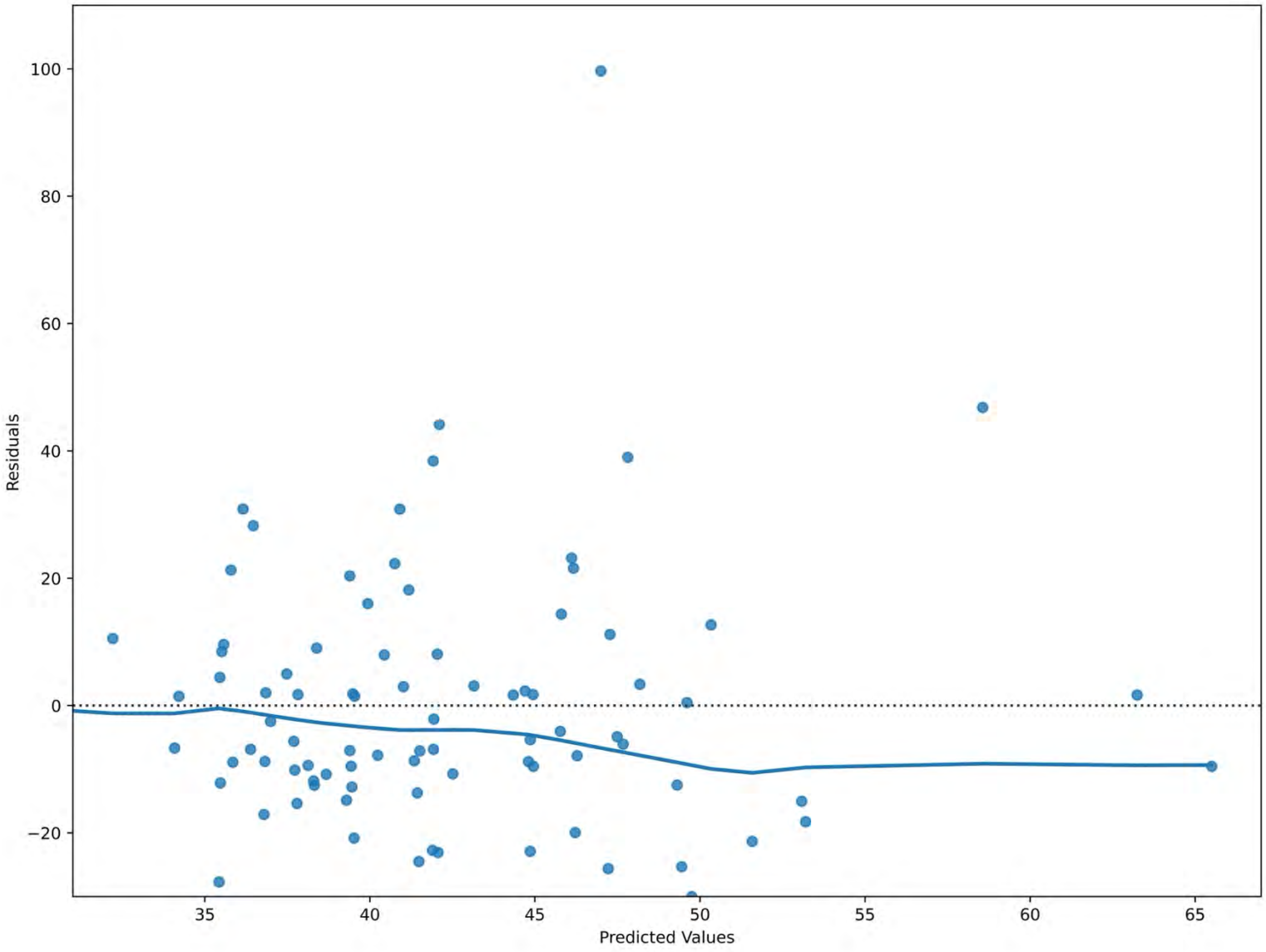


*Figure 11: Residual Plot and LOESS Line for Simple Regression ("All Controls" in Table 1) Using All 111 Discretionary Non-ADU Observations 2018 - 2021*




In Figure 10: Residual Plot and LOESS Line for Simple Regression ("No Controls" in Table 1) Using All 111 Non-Discretionary Non-ADU Observations 2018 - 2021, there is clustering in this plot. This indicates that the simple regression model is missing information to properly explain the relationship between the number of approval steps and timeframes. It strongly indicates that there are factors outside the number of approval steps that impacts the linear relationship between timeframes.

Figure 11: Residual Plot and LOESS Line for Simple Regression ("All Controls" in Table 1) Using All 111 Discretionary Non-ADU Observations 2018 - 2021 shows the residual plot of the regression specification when we control for process intensity, project size, neighborhood vulnerability, whether the project received an administrative appeal, and affordability. The clustering in this residual plot is less pronounced, which indicates that the controls are effective

in capturing sources of variation that influence the relationship between the number of approval steps and timeframes. Also, observe that there is no clear, consistent pattern in the residual plot. This indicates that a linear regression is most likely the best functional form for our model.

However, observe that the LOESS line is not a linear line at zero, but is rather slightly sloping downward. This indicates that there may be other omitted variables that impact the relationship between timeframes and approval steps, which may bias the magnitude of our regression estimates. Future regression work can test the use of interactive effects between independent variables or assess the impact of new control variables.

**Appendix B: Spatial Distribution of Developments**

Affordability and TCAC Category Cross Sectional Table (N=144), 2018 - 2021[1]

| Highest Resource | Projects | Units | Affordable Units | Median Time | Mean Time |
|---|---|---|---|---|---|
| Market-rate | 10 | 352 | - | 29.38 | 30.91 |
| Market-rate(ADU) | 1 | 5 | - | 6.41 | 6.41 |
| Mixed Inc.(Discretionary) | 3 | 150 | 38 | 28.21 | 31.34 |
| 100% Aff.(Discretionary) | 0 | - | - | - | - |
| 100% Aff.(SB 35–Began as Disc.) | 1[2] | 135 | 135 | 15.39 | 15.39 |
| **High Resource** | **Projects** | **Units** | **Affordable Units** | **Median Time** | **Mean Time** |
| Market-rate | 9 | 328 | - | 39.81 | 38.15 |
| Market-rate(ADU) | 6 | 47 | - | 9.63 | 17.20 |
| Mixed Inc.(Discretionary) | 6 | 242 | 43 | 53.51 | 53.48 |
| 100% Aff.(Discretionary) | 2 | 19 | 19 | 9.53 | 9.53 |
| 100% Aff.(Always SB 35) | 2 | 228 | 228 | 4.47 | 4.47 |
| **Moderate Resource (Rapidly Changing to higher resources)** | **Projects** | **Units** | **Affordable Units** | **Median Time** | **Mean Time** |
| Market-rate | 4 | 47 | - | 32.74 | 37.44 |
| Market-rate(ADU) | 1 | 7 | - | 21.99 | 21.99 |
| Mixed Inc.(Discretionary) | 3 | 237 | 81 | 32.08 | 28.48 |
| Mixed Inc.(ADU) | 1 | 24 | 3 | 41.19 | 41.19 |
| 100% Aff.(Discretionary) | 0 | - | - | - | - |
| 100% Aff.(SB 35–Began as Disc.) | 2[3] | 268 | 267 | 26.20 | 26.20 |
| **Moderate Resource** | **Projects** | **Units** | **Affordable Units** | **Median Time** | **Mean Time** |
| Market-rate | 18 | 1,555 | - | 40.41 | 40.30 |
| Market-rate(ADU) | 6 | 38 | - | 26.50 | 24.38 |
| Mixed Inc.(Discretionary) | 21 | 2,564 | 520 | 41.03 | 40.67 |
| 100% Aff.(Discretionary) | 1 | 178 | 176 | 28.04 | 28.04 |
| 100% Aff.(Always SB 35) | 2 | 175 | 173 | 4.65 | 4.65 |
| 100% Aff.(SB 35–Began as Disc.) | 1[4] | 63 | 63 | 41.39 | 41.39 |
| **Low Resource** | **Projects** | **Units** | **Affordable Units** | **Median Time** | **Mean Time** |
| Market-rate | 14 | 1,982 | - | 38.45 | 47.15 |

| | | | | | |
|---|---|---|---|---|---|
| Mixed Inc.(Discretionary) | 19 | 1,153 | 191 | 27.58 | 33.47 |
| Mixed Inc.(Always SB 35) | 2 | 720 | 294 | 6.84 | 6.84 |
| 100% Aff.(Discretionary) | 1 | 15 | 15 | 55.96 | 55.96 |
| 100% Aff.(Always SB 35) | 3 | 400 | 400 | 2.40 | 2.40 |
| 100% Aff.(SB 35–Began as Disc.) | 3[5] | 394 | 393 | 32.58 | 30.70 |

| High Segregation & Poverty | Projects | Units | Affordable Units | Median Time | Mean Time |
|---|---|---|---|---|---|
| Market-rate | 0 | - | - | - | - |
| Market-rate(ADU) | 2 | 13 | - | 19.04 | 19.04 |
| Mixed Inc.(Discretionary) | 0 | - | - | - | - |
| 100% Aff.(Discretionary) | 0 | - | - | - | - |

[1] Observations that are student or group housing developments have been categorized as market-rate. We confirmed that group housing beds are not deed-restricted affordable.
[2] This is 1360 43rd Ave, originally proposed under 1351 42nd Ave. This project began as a discretionary entitlement. We use the earliest file date to calculate timeframes.
[3] The two SB 35 projects in this category of Moderate Resource (Rapidly Changing) began before SB 35 was signed into law, which influences timeframe calculations in this neighborhood classification. We logged one project, 2340 San Jose Ave, as having an earliest file date of 9/21/2017. We logged a second project, 4840 Mission St, as having an earliest file date of 9/21/2016. Further, 2340 San Jose Ave does not have an eligibility determination date, though we know it received a building permit. But we excluded it from timeframe analysis.
[4] This is 2205 Mission St, which began as a discretionary project.
[5] Three SB 35 projects in this category (Low Resource) began before SB 35 was signed into law.

## Affordability and 2021 TCAC Category Cross Sectional Table, 2014 - 2017

| Highest Resource | Projects | Units | Affordable Units | Median Time | Mean Time |
|---|---|---|---|---|---|
| Market-rate | 3 | 69 | - | 89.98 | 79.68 |
| Mixed Income | 1 | 41 | 6 | 38.70 | 38.70 |
| 100% Affordable | 0 | 0 | 0 | 0.00 | 0.00 |

| High Resource | Projects | Units | Affordable Units | Median Time | Mean Time |
|---|---|---|---|---|---|
| Market-rate | 6 | 120 | - | 23.79 | 24.77 |
| Mixed Income | 5 | 287 | 27 | 18.94 | 20.92 |

| | | | | | |
|---|---|---|---|---|---|
| 100% Affordable | 0 | 0 | 0 | - | - |
| Moderate Resource (Rapidly Changing) | Projects | Units | Affordable Units | Median Time | Mean Time |
| Market-rate | 4 | 100 | - | 19.50 | 21.48 |
| Mixed Income | 3 | 527 | 171 | 34.26 | 32.10 |
| 100% Affordable | 0 | 0 | 0 | - | - |
| Moderate Resource | Projects | Units | Affordable Units | Median Time | Mean Time |
| Market-rate | 29 | 2415 | - | 26.37 | 34.31 |
| Mixed Income | 25 | 3071 | 415 | 31.59 | 35.11 |
| 100% Affordable | 0 | 0 | 0 | - | - |
| Low Resource | Projects | Units | Affordable Units | Median Time | Mean Time |
| Market-rate | 20 | 1600 | - | 23.98 | 27.17 |
| Mixed Income | 39 | 5472 | 982 | 31.23 | 30.30 |
| 100% Affordable | 4 | 400 | 400 | 13.73 | 14.16 |
| High Segregation & Poverty | Projects | Units | Affordable Units | Median Time | Mean Time |
| Market-rate | 0 | 0 | - | - | - |
| Mixed Income | 0 | 0 | 0 | - | - |
| 100% Affordable | 1 | 167 | 167 | 34.49 | 34.49 |

Affordability and Priority Equity Geographies (PEG) Sectional Table, 2018 - 2021 (N=144)

| Vulnerable Area, Denoted by PEG | Projects | Units | Affordable Units | Median Time | Mean Time |
|---|---|---|---|---|---|
| Market-rate(Discretionary) | 26 | 2,377 | - | 36.85 | 43.54 |
| Market-rate(ADU) | 6 | 37 | - | 21.70 | 22.56 |
| Mixed Inc.(Discretionary) | 35 | 2,424 | 468 | 32.09 | 34.97 |
| Mixed Inc.(Always SB 35) | 1 | 270 | 109 | 6.05 | 6.05 |
| Market-rate(ADU) | 1 | 24 | 3 | 41.19 | 41.19 |
| 100% Aff.(Discretionary) | 1 | 15 | 15 | 55.96 | 55.96 |
| 100% Aff.(Always SB 35) | 4[2] | 512 | 510 | 2.91 | 3.31 |
| 100% Aff.(SB 35–Began As Disc.) | 6 | 725 | 723 | 32.58 | 31.94 |
| **Not In a Vulnerable Area, Denoted by PEG** | **Projects** | **Units** | **Affordable Units** | **Median Time** | **Mean Time** |
| Market-rate | 29 | 1,88773 | - | 36.00 | 36.40 |
| Market-rate(ADU) | 10 | | - | 9.71 | 18.07 |
| Mixed Inc.(Discretionary) | 17 | 1,922 | 405 | 42.44 | 45.09 |
| 100% Aff.(Always SB 35) | 1 | 450 | 185 | 7.63 | 7.63 |
| 100% Aff.(Discretionary) | 3 | 197 | 195 | 11.31 | 15.70 |
| 100% Aff.(Always SB 35) | 3 | 291 | 291 | 2.76 | 3.90 |
| 100% Aff.(SB 35–Began As Disc.) | 1 | 135 | 135 | 15.39 | 15.30 |

**Distribution of Affordable Units (Inclusive of 11 Observations From Updated APR)**

2014 - 2015 Affordable Units, by 2021 TCAC Distribution (N=351 new affordable units)

| Neighborhood TCAC Category | Total Affordable Units in Category | Percentage (of Total Affordable Units) |
|---|---|---|
| Highest Resource | 0 | 0.00% |
| High Resource | 3 | 3.70% |
| Moderate Resource (Rapidly Changing) | 0 | 0.00% |
| Moderate Resource | 194 | 55 .27% |

| | | |
|---|---|---|
| Low Resource | 144 | 41.03% |
| High Segregation and Poverty | 0 | 0.00% |

2016 - 2017 Affordable Units Distribution, by 2021 TCAC (N=1,817 new affordable units)

| Neighborhood TCAC Category | Total Affordable Units in Category | Percentage (of Total Affordable Units) |
|---|---|---|
| Highest Resource | 6 | 0.33% |
| High Resource | 14 | 0.77% |
| Moderate Resource (Rapidly Changing) | 171 | 9.41% |
| Moderate Resource | 221 | 12.16% |
| Low Resource | 1,238 | 68.13% |
| High Segregation and Poverty | 167 | 9.19% |

2018 - 2019 Affordable Units Distribution by 2021 TCAC, Expanded by SB 35 Affordable Units (N=1,390 new affordable units, SB 35 affordable units=896)

| Neighborhood TCAC Category | Total Affordable Units in Category | Percentage (of Total Affordable Units) |
|---|---|---|
| Highest Resource | Total: 22<br>• SB 35: 0<br>• Non SB 35: 22 | Total: 1.58% |

| | | |
|---|---|---|
| High Resource | Total: 17<br>• SB 35: 0<br>• Non SB 35: 17 | Total: 1.22% |
| Moderate Resource (Rapidly Changing) | Total: 336<br>• SB 35: 267<br>• Non SB 35: 69 | Total: 24.17% |
| Moderate Resource | Total: 321<br>• SB 35: 0<br>• Non SB 35: 321 | Total: 23.09% |
| Low Resource | Total: 694<br>• SB 35: 629<br>• Non SB 35: 65 | Total: 49.93% |
| High Segregation and Poverty | Total: 0<br>• SB 35: 0<br>• Non SB 35: 0 | Total: 0.00% |

2020 - 2021 Affordable Units Distribution by 2021 TCAC, Expanded by SB 35 Affordable Units (N=1,649 new affordable units, SB 35 affordable units=1,057)

| Neighborhood TCAC Category | Total Affordable Units in Category | Percentage (of Total Affordable Units) |
|---|---|---|
| Highest Resource | Total: 151<br>• SB 35: 135<br>• Non SB 35: 16 | Total: 9.16% |
| High Resource | Total: 273<br>• SB 35: 228<br>• Non SB 35: 45 | Total: 16.56% |
| Moderate Resource (Rapidly Changing) | Total: 15<br>• SB 35: 0<br>• Non SB 35: 15 | Total: 0.91% |
| Moderate Resource | Total: 611<br>• SB 35: 236<br>• Non SB 35: 375 | Total: 37.05% |
| Low Resource | Total: 599<br>• SB 35: 458<br>• Non SB 35: 141 | Total: 36.33% |

| | | |
|---|---|---|
| High Segregation and Poverty | Total: 0<br>• SB 35: 0<br>• Non SB 35: 0 | Total: 0.00% |

**Distribution of Affordable Units, by Priority Equity Geographies**

2014 - 2015 Affordable Units by Priority Equity Geographies (N=351 new affordable units)

| | Total Affordable Units in Category | Percentage (of Total Affordable Units) |
|---|---|---|
| Vulnerable Area, Denoted by Priority Equity Geographies | 154 | 43.87% |
| NOT in a vulnerable Area, Denoted by Priority Equity Geographies | 197 | 56.13% |

2016 - 2017 Affordable Units by Priority Equity Geographies (N=1,817 new affordable units)

| | Total Affordable Units in Category | Percentage (of Total Affordable Units) |
|---|---|---|
| Vulnerable Area, Denoted by Priority Equity Geographies | 282 | 15.52% |
| NOT in a vulnerable Area, Denoted by Priority Equity Geographies | 1,535 | 84.48% |

2018 - 2019 Affordable Units by Priority Equity Geographies (N=1,390 new affordable units, SB 35 affordable units=896)

| | Total Affordable Units in Category | Percentage (of Total Affordable Units) |
|---|---|---|
| Vulnerable Area, Denoted by Priority Equity Geographies | Total: 294<br>• SB 35: 0<br>• Non-SB 35: 294 | Total: 21.15% |

| | | |
|---|---|---|
| NOT in a vulnerable Area, Denoted by Priority Equity Geographies | Total: 1,096<br>• SB 35: 896<br>• Non-SB 35: 200 | Total: 78.85% |

2020 - 2021 Affordable Units by Priority Equity Geographies (N=1,649 new affordable units, SB 35 affordable units=1,057)

| | Total Affordable Units in Category | Percentage (of Total Affordable Units) |
|---|---|---|
| Vulnerable Area, Denoted by Priority Equity Geographies | Total: 732<br>• SB 35: 446<br>• Non-SB 35: 286 | Total: 44.39% |
| NOT in a vulnerable Area, Denoted by Priority Equity Geographies | Total: 917<br>• SB 35: 611<br>• Non-SB 35: 306 | Total: 55.61% |

Number and Percentage of 100% Affordable Developments in Areas with a Higher Density of Vulnerable Populations, by Year.

| Year | Number of 100% Affordable Entitlements | Percentage of 100% Affordable Entitlements in Sensitive Geographies |
|---|---|---|
| 2014 – 2017 (N=5) | Total: 5 | Total: 100% |
| 2018 – 2019 (N=8) | Total: 6<br>• SB 35: 6<br>• Discretionary Non-ADU: 0 | Total: 75% |
| 2020 – 2021 (N=10) | Total: 5<br>• SB 35: 4<br>• Discretionary Non-ADU: 1 | Total: 50% |

## Appendix C: Analysis of Accuracy of Annual Progress Report Data on Entitlements and SB 35 Approvals

We relied on Annual Progress Report data that we pulled over three periods. For the 2018 - 2019 analysis, we first built a list of observations from 2018 - 2019 APR data that we gained access to on May 18, 2020. We began collecting data on these observations for related research during the 2021 - 2022 academic year, prior to working with HCD on this study. We did not collect as much information as we did for this research during that period, however. We then downloaded San Francisco's Original 2020 - 2021 APR data on or around October 2, 2022, to construct our original observation list for data collection. We then downloaded 2021 APR data on February 18, 2023. Then we downloaded all four years—2018 - 2021—APR data on July 14, 2023, from the state data dashboard to do a final check to confirm if we had any additional observations that may have come in through corrected reporting for any one of these four years. We also separately reviewed environmental review determinations to identify any possible observations not included in any APR data.

San Francisco reported 72 entitlements or SB 35 approvals in 2018 and 2019 on the report we accessed dated May 18, 2020.

- Of the 72 entitlements or SB 35 approvals from 2018 - 2019, we determined that 45 of these observations (~63%) were entitled in 2018 - 2019 and reported in the correct year.
- Therefore, 27 entitlements or SB 35 approvals (~38%) in the 2018 - 2019 APR (N=72) were incorrect reports.
- We found an additional seven entitlements or SB 35 approvals issued in 2018 - 2019 that San Francisco reported in another year (or the wrong year).
- The 2018 - 2019 APR Report also missed 33 entitlements issued in those years, which we found from reviewing San Francisco's Environmental Review Documents and Planning Commission Agendas.

San Francisco reported 82 observations entitled in 2020. San Francisco reported 30 entitlements or SB 35 approvals in 2021. Combined, San Francisco reported 112 entitlements or SB 35 approvals across 2020 - 2021.

- Of the 112 observations from 2020 - 2021, we determined that 45 of these observations (~40%) were entitled in 2020 - 2021 and San Francisco reported the correct year.
- We found an additional 18 entitlements or SB 35 approvals issued in 2020 - 2021 that San Francisco reported, but reported as entitled in the wrong year.
- 67 observations (~60%) in the 2020 - 2021 APR (N=112) are incorrect reports.
- Most, or 62 (out of 67), incorrect reports in the 2020 - 2021 APR are from Reporting Year 2020.
- The 2020 - 2021 APR data also missed an additional 21 entitlements, which we found through reviewing environmental review determinations.

In the inaccurate reporting across 2018 - 2021, we determined six entitlements that San Francisco incorrectly reported in 2018 - 2021 were entitled sometime in 2014 - 2017.

We also used the July 14, 2023, download of San Francisco's Annual Progress Reports to HCD a final time to run a second audit of the 2018 - 2021 APR before completing all analysis. In total, San Francisco underreported on 69 entitlements or SB 35 approvals across those four years.

| | |
|---|---|
| **From:** | Howard |
| **To:** | Board of Supervisors (BOS); Calvillo, Angela (BOS); Carroll, John (BOS) |
| **Cc:** | Lurie, Daniel (MYR); Sauter, Danny (BOS); dennis-phillips@sfgov.org; rachel.tanner@sfgov.org; Chen, Lisa (CPC); So, Lydia (CPC); Moore, Kathrin (CPC); Imperial, Theresa (CPC); Braun, Derek (CPC); Campbell, Amy (CPC); Mcgarry, Sean (CPC); Williams, Gilbert A (CPC); CPC-Commissions Secretary |
| **Subject:** | UPZONING: ANALYSIS: PERFECT PLANNING = ICONIC BEAUTY + HOUSING |
| **Date:** | Monday, December 1, 2025 6:02:46 AM |
| **Attachments:** | ~~~~PERFECT PLANNING = ICONIC BEAUTY + HOUSING 12-25.pdf |

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

FOR HEARINGS ON UPZONING PLAN
**TO:** Board of Supervisors
**CC:** Mayor Lurie/ Office, Planning Commission/ Staff
**ATTACHED: PERFECT PLANNING = ICONIC BEAUTY + HOUSING**

An entertaining and informative analysis of the history of Waterfront Land-Use Battles, development fights, upzoning, housing options, affordable housing around the world and photos.
Best Regards, Howard Wong, AIA
**P.S.: Please include in Board Package---online and printed (if possible) for public education.**

# PERFECT PLANNING = ICONIC BEAUTY + HOUSING



## OPPOSE WATERFRONT UPZONING *Please share this!*

**SEE BELOW: HISTORY OF SF WATERFRONT LAND-USE BATTLES:**

PROTECT WATERFRONT BEAUTY AND HISTORIC NEIGHBORHOODS AS ECONOMIC ASSETS
San Francisco's waterfront/ hilltop beauty is priceless. Environmental capital, like physical/ visual links to the Bay, has quantifiable value. The City's Mediterranean beauty differentiates it from most cities. Tourism attracts 23 million visitors and $9 billion/ year. Public vistas fuel a real estate industry of up to $10 billion/ year. Conservatively, waterfront beauty has a $2 billion valuation/ year---for perpetuity.

**History makes the case for Voter Approval of waterfront development/ height increases**
Generations of San Franciscans have fought to protect the beauty and scale of the northern waterfront. Upzoning at the northern waterfront would override General Plans, urban design/ environmental elements, planning priorities, design guidelines, settled law, ballot measures, legislation, codes, and voter advocacy for a Mediterranean scale---with building heights tapering gently upward to hilltops.

**Planning codes have reinforced the waterfront's 40-foot height limit** as a benchmark for tapering heights---protecting visual corridors to the bay. Public and legal directives have elevated environmental beauty as a priority, aspiring to the beauty of Venice, Florence, Santorini, Paris and great places that have protected their timeless treasures and World Heritage Sites---actual and potential.

## HOUSING: SUPERLATIVE OPTIONS *Please share this!*

INSTEAD OF PLANNERS, HIRE MATHEMATICIANS AND FINANCIERS TO CREATE NEW HOUSING.
San Francisco's Chief Economist deems the SF Upzoning Plan as unrealistic. ***Why approve a deleterious upzoning plan, harming neighborhoods and waterfronts, when better options exist?*** Throughout the world, cities/ countries/ people have built vast amounts of affordable housing for their growing populations. Besides, San Francisco has already built, entitled more projects, and forecasts more development than almost any city in the region and state.

**Mathematicians can finetune hypotheses and calculate housing construction accurately.**
Depending on the timeline, completed projects, in-progress projects, entitled projects, proposed projects (more every day), untapped zoning capacity, infill development, availability of public land, new financing plans, new area/ neighborhood plans, and revised incentives/ housing types/ unit sizes/ densification, San Francisco can likely meet its RHNA (Regional Housing Needs Allocation)---without flailing citywide upzoning. Rather than number of housing units, the focus should be on the number of people housed.

**Financiers can coalesce all funding to effectively build housing:** $20 billion MTC Regional Affordable Housing Bond (2028 as a revolving fund), local/ state housing bonds, grants, trust funds, tax credits, tax increment financing, low-interest loans, public banks, nonprofits, philanthropy, partnerships, rent subsidies, and more. Many countries have affordable housing strategies and programs---worth emulating. ***Affordable housing is not for lack of zoning, but lack of comprehensive planning.***

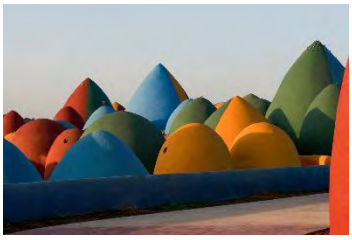




**DO THE MATH: HOUSING TAKES MANY FORMS:** After the 1906 Earthquake, 250,000 San Franciscans were homeless (60% of the population)---quickly housed in tens/t camps and tiny redwood cottages. Today, the homeless instinctively gather in encampments, RV/ car clusters, for community and self-support. As seen throughout the world, affordable housing can take the form of cooperative housing, micro-housing, shared housing, land trusts, accessory units, modular dwellings, single-room occupancies, boarding houses, public housing, dual-use spaces, and informal communities (at least for the near/ short term). Rio de Janeiro's favelas are naturally-occurring low-income squatter housing---a normal human response to homelessness. 35% of Lima's population live in squatter settlements and 50% are employed in informal jobs. Around the world, 1 billion people live in slums or other informal settlements.

**AFFORDABLE HOUSING IS A PUBLIC POLICY CHOICE.** Government has economic tools to invest in land, utilize public property, zone for public benefits, provide public services, incentivize smaller/ plentiful dwellings, provide flexibility in housing, give tax incentives, prioritize approvals and permitting. Not inconceivable, like China and forty other countries, government can build new cities and towns---on public land. China has built hundreds of new cities, including many with one million residents. ***The region and the state can carry its housing fair share, not just the 49 square miles of San Francisco.***

**RENTCHAMBER: The Top 10 Countries with Exceptional Housing Policies**
**https://rentchamber.com/the-top-10-countries-with-exceptional-housing-policies/**
**WIKIPEDIA: Affordable Housing by Country:**
**https://en.wikipedia.org/wiki/Affordable_housing_by_country**






**GUARDIAN: The social housing secret: how Vienna became the world's most livable city**
**https://www.theguardian.com/lifeandstyle/2024/jan/10/the-social-housing-secret-how-vienna-became-the-worlds-most-livable-city**
**NPR: Could this city be the model for how to tackle the housing crisis and climate change?**
**https://www.npr.org/2025/06/15/nx-s1-5400642/affordable-housing-environment-vienna-climate-change**
**HOUSING PERSPECTIVES: What Can We Learn from the Dutch Social Housing System?**
**https://www.jchs.harvard.edu/blog/what-can-we-learn-dutch-social-housing-system**
**ASSEMBLE PAPERS: A primer on social housing in Amsterdam**
**https://assemblepapers.com.au/2018/12/13/amsterdam-social-housing-a-primer/**
**ROUTE FIFTY: Hungry for affordable housing, communities turn to land trusts** **https://www.route-fifty.com/management/2024/09/hungry-affordable-housing-communities-turn-land-trusts/399784/?oref=rf-today-nl&utm_source=Sailthru&utm_medium=email&utm_campaign=Route%20Fifty%20Today:%20September%2025%2C%202024&utm_term=newsletter_rf_today**
**BLOOMBERG: Why Singapore Has One of the Highest Home Ownership Rates**
**https://www.bloomberg.com/news/articles/2020-07-08/behind-the-design-of-singapore-s-low-cost-housing?cmpid=BBD102120_CITYLAB&utm_medium=email&utm_source=newsletter&utm_term=201021&utm_campaign=citylabdaily**

WATERFRONT BEAUTY = BEST ECONOMICS ***Please share this!***

# HISTORY: SF WATERFRONT LAND-USE BATTLES

**Over time, by tapering heights downward towards the waterfront, public vistas and San Francisco's hills/ beauty will be preserved for all---an economic asset that attracts 23 million visitors and $9 billion per year.**



SAN FRANCISCO HAS THWARTED DARWINIAN MARKET FORCES, which threaten prime waterfront sites for obstructive development. Big money is spent to push projects by the few who benefit financially---developers, contractors, consultants, public relations firms, city staff, politicians, and groups that reap donations, fees, payments, and wages. Instead, citizens/ height limits/ codes have protected our Mediterranean village-like character for all.

**SAN FRANCISCO'S WATERFRONT BATTLES** led to protective tapering height limits, which preserve public vistas and a Mediterranean village-like beauty for everyone. Powerful special interests attempt to override codes---to gain extraordinary favors. Each code exemption is used to justify subsequent height increases----a never-ending ratcheting upward. Learning from history, we can better appreciate the waterfront's esthetic and economic value.



The Fontana Towers led to the 40-foot height limit on the waterfront.



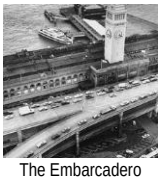
The Fontana Towers battle stopped five other high-rises at Aquatic Park.



San Francisco's Freeway Revolt started a national movement.



The Embarcadero Freeway was stopped at Broadway---in mid-construction.



The Embarcadero Freeways demolition opened the waterfront.



Freeway plans wrapped around the entire waterfront and throughout the city.



WPA Freeway Plan, around northern waterfront---and over Columbus Ave.



The freeway wall along the waterfront was a near reality.




"Save The Bay" map and Reber Plan for bay infill.



Citizen activists and founders of "Save The Bay": Esther Gulick, Sylvia McLaughlin, Catherine Kerr.

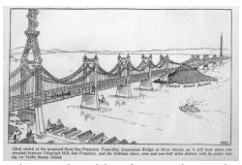
HISTORY TEACHES US that many design options exist for any site---like fully code-compliant alternatives or open space. After contentious debates, better designs often result.
FOUNDSF: The Fontana Towers and Waterfront Battle.
http://foundsf.org/index.php?title=Height_Limit_Revolt_Saves_Waterfront_Vistas
Residents of Russian Hill and Attorney Casper Weinberger (a Republican conservationist) stopped towers along the waterfront. A coalition fought for the waterfront 40-foot height limits. Later, height limits on Russian Hill were passed.



Bridge and large development proposed adjacent to Telegraph Hill---through North Beach.



Bridge and freeways proposed atop Telegraph Hill.



The Rush Bridge from Telegraph Hill had three stories of traffic lanes.



Proposed bridge from Telegraph Hill to Angel Island & Tiburon---stopped by Washington officials.



Russian Hill: Ten years after 40-foot height limit.



Ferry Building Project (1968) with helipad atop roof.



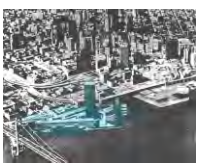
World Trade Center (1950) demolishes Ferry Building.



World Trade Center's terraced high-rises at waterfront.



Proposed 30-story skyscraper at waterfront.



U.S. Steel Building Complex---South of Ferry Building.



Embarcadero Crescent (1961): Ferry Building to Aquatic Park.



Embarcadero Crescent (1961): Bay development east of Telegraph Hill.



The 1963 Downtown Plan had two high-rises flanking the saved Ferry Building's tower.



Old Produce Market's tenants fought and were displaced by the Golden Gateway towers.



Instead of more Golden Gateway towers, activists fought for the low-rise Golden Gateway Commons.

ENVIRONMENTAL CAPITAL: A long-term economic measure includes incorporating "natural capital"---the value of such things as esthetics, nature, and generic diversity---into economic decision-making. From a long-range perspective, waterfront beauty has incalculable economic value---for regional drawing power and people's happiness quotient.



Russian Hill Towers (1958): Mies van der Rohe proposal with block-long parking garage.



Port Authority Plan (1959: Office buildings, hotel, commercial, terminal….



International Market Place (1968): Multiblock complex at foot of Telegraph Hill.



Ferry Building Plans (1968): Northern Waterfront Plan.



Port Plaza Project (1970)" Ferry Building and Pier 1.



Villamarina Project (1974): The piers and area around Aquatic Park developed.



Pei-Cobb-Fried Proposal (1980)" Office and commercial at Ferry Building and Pier 1.



Koll's Sailing Center (1980)" Piers at Bay Bridge---Hotel, restaurant, retail, marina….



SWL 330 Condo Tower (2006) built though Pier 30-32 cruise terminal cancelled.



Arena/ Condo Project (2014): Entertainment venue and condo towers around Pier 30-32---moved.

THE DEVELOPER-POLITICAL COMPLEX of financial interests works to heighten development, to escalate land values and to transfer public assets to private interests. Freeways and subways are regional escalators of real estate values by promoting well-heeled commuters. The Developer-Political Complex is a network of financial self-interests --- developers, realtors, contractors, consultants, public relations firms, politicians, city staff, nonprofits, and groups who receive donations, fees, payments, and wages. Citizens have rightfully fought for their assets.

FOUNDSF: "The Freeway Revolt" **http://foundsf.org/index.php?title=The_Freeway_Revolt**

**O**n November 2, 1956 the *San Francisco Chronicle* graciously published a map of the proposed and actual freeway routes through San Francisco even though its accompanying editorial was already chastising protestors: "The remarkable aspect of these protests and claims of injury is their tardiness. They concern projects that have for years been set forth in master plans, surveys, and expensive traffic studies. They have been ignored or overlooked by citizens and public official alike—until the time was at hand for concrete pouring and when revision had become either impossible or extremely costly. The evidence indicates that the citizenry never did know or had forgotten what freeways the planners had in mind for them."

**WE ARE ON LIFE'S STAGE EVER SO BRIEFLY** relative to the timeless beauty of the waterfront environment. It is the responsibility of each generation to protect natural assets for all.

## Howard Wong, AIA









| | |
|---|---|
| **From:** | patricia_inez@everyactioncustom.com on behalf of Patrice Thompson |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Don"t Block Common-Sense and Compliant Amendments [File Nos. 250700, 251073, 251072, 230001, 250701, 250985, 251071, 250966] |
| **Date:** | Tuesday, November 25, 2025 9:13:04 PM |

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

Dear Board of Supervisors,

The Land Use Committee, on a vote of 2-1, has blocked Supervisor Chan's amendments and its Chair declined to invite HCD, the state oversight agency, to answer questions publicly.

The Committee must advance these compliant amendments for the protection of sound housing, historic resources, and our coastline to the full Board so the public can see where every Supervisor stands.

HCD leadership should also appear before the Board to explain how the housing numbers are calculated and how the proposed upzoning affects compliance.

San Franciscans deserve transparent and accountable planning.

Additional comments:

Sincerely,
Patrice Thompson
San Francisco, CA 94121

| | |
|---|---|
| **From:** | mark@everyactioncustom.com on behalf of Mark Hanlon |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Protect Our Neighborhoods — Reject Extreme Upzoning [Files: 250700, 250701, 250966] |
| **Date:** | Wednesday, November 26, 2025 9:45:25 AM |

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

Dear Board of Supervisors,

As a long-time San Franciscan whose family has lived her for generations, both as renters and home-owners, I care deeply about the character and livability of our neighborhoods. I write to express my strong opposition to Mayor Lurie's current upzoning proposal. As written, the plan incentivizes the demolition of existing homes, displaces renters and small businesses, and risks turning diverse residential areas into corridors of luxury high-rises that most San Franciscans cannot afford.

I'm asking you to:

Substantially scale back the Mayor's proposed upzoning maps

Request a postponement of the arbitrary January 2026 upzoning deadline

These maps would create permanent and irreversible land-use changes across the city, far beyond what state or regional requirements demand — and with no meaningful affordability commitments. In practice, they clear a path for widespread demolition and large luxury developments that largely serve investors rather than the communities they reshape.

San Francisco deserves thoughtful, community-driven planning that protects existing residents, supports small businesses, and ensures genuine affordability — not displacement packaged as progress.

Thank you for your attention to this critical issue.

Sincerely,
Mark Hanlon
San Francisco, CA 94118

**From:** Justin Truong
**To:** Board of Supervisors (BOS)
**Subject:** San Francisco Needs More Housing Options: Support Family Zoning Plan
**Date:** Thursday, November 27, 2025 11:23:55 PM

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

Clerk of the Board Angela Calvillo,

Dear San Francisco Supervisors,

I'm writing to express my strong support for the Family Zoning Plan.

San Francisco urgently needs more homes — and this plan moves us in the right direction. It will expand housing choices across the city, especially in high-opportunity areas near transit, jobs, and schools. It gives families the flexibility to build backyard units, in-law apartments, and small buildings that allow them to stay close to the people they love.

This is a thoughtful, community-informed proposal that aligns with our Housing Element goals while addressing the real, everyday needs of San Franciscans. I urge you to support the Family Zoning Plan and to continue working toward a housing system that is fair, inclusive, and responsive to the city's future.

Let's build a San Francisco where everyone can belong. Thank you for your partnership and collaboration.

Justin Truong
justintruong56@gmail.com
33 Junior Terrace
San Francisco, California 94112

| | |
|---|---|
| **From:** | Bullock, John (BOS) |
| **To:** | BOS-Supervisors; BOS-Legislative Aides |
| **Cc:** | BOS-Operations; Carroll, John (BOS); BOS Legislation, (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS) |
| **Subject:** | 7 Letters Regarding File Nos. 250700, 250701, 250966, and 251072 |
| **Date:** | Tuesday, December 2, 2025 12:10:13 PM |
| **Attachments:** | 7 Letters Regarding File Nos. 250700, 250701, 250966, and 251072.pdf |

Hello,

Please see attached 7 letters regarding File Nos.:

250700: Zoning Map - Family Zoning Plan
250701: Planning, Business and Tax Regulations Codes - Family Zoning Plan
250966: General Plan Amendments - Family Zoning Plan
251072: Planning, Business and Tax Regulations Codes - Family Zoning Plan

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

| | |
|---|---|
| **From:** | Mchugh, Eileen (BOS) |
| **To:** | BOS-Operations |
| **Subject:** | Fw: San Francisco Eastern Neighborhoods Democratic Club (SFENDC) Support for Mayor Lurie"s Family Zoning Plan |
| **Date:** | Tuesday, December 2, 2025 9:57:18 AM |

Get Outlook for iOS

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**From:** Bruce Agid <bruce.h.agid@gmail.com>
**Sent:** Tuesday, December 2, 2025 9:02 AM
**To:** Melgar, Myrna (BOS) <myrna.melgar@sfgov.org>; Mahmood, Bilal (BOS) <bilal.mahmood@sfgov.org>; Chen, Chyanne (BOS) <Chyanne.Chen@sfgov.org>; Sherrill, Stephen (BOS) <Stephen.Sherrill@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>; Chan, Connie (BOS) <connie.chan@sfgov.org>; Sauter, Danny (BOS) <Danny.Sauter@sfgov.org>; Dorsey, Matt (BOS) <matt.dorsey@sfgov.org>; Fielder, Jackie (BOS) <Jackie.Fielder@sfgov.org>; Alan.Wong1@sfgov.org <Alan.Wong1@sfgov.org>; Mandelman, Rafael (BOS) <rafael.mandelman@sfgov.org>
**Cc:** Meaghan Mitchell <Meaghanmitchell@gmail.com>; Tyra Fennell <tyrafennellsf@gmail.com>; Sean Karlin <sean.karlin@gmail.com>; Amerika Sanchez <amerikasanchez@gmail.com>; Charley Goss <charlesbgoss@gmail.com>; Derek Lee <derekjlee27@gmail.com>; Kurt Grimes <kurtb.grimes@gmail.com>; Chris Chang <chriskchang@gmail.com>; Maika Pinkston <maikapinkston@gmail.com>; Latoya Pitcher <ltpitcher@gmail.com>; Spencer Lam <spencerl1296@gmail.com>; Eric Dew <edew@theizegroup.com>; Mark Malouf <mmalouf@teamsters665.org>; Alan Tsui <alant2k@yahoo.com>; Rachael Tanner <r.ann.tanner@gmail.com>; Gary Pegueros <garypegueros@sbcglobal.net>; Chanel Blackwell <chanelblackwell1@gmail.com>; Elijah Ball <elijahiball@gmail.com>; Courtney Sid <courtneysid@gmail.com>; sliubettencourt@gmail.com <sliubettencourt@gmail.com>; JiLon Li <jilonli@gmail.com>; Rupali Singhal <rupa9988@gmail.com>; Carroll, John (BOS) <john.carroll@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Herrera, Ana (BOS) <ana.herrera@sfgov.org>; Burch, Percy (BOS) <percy.burch@sfgov.org>; Yan, Calvin (BOS) <calvin.yan@sfgov.org>; Andrews, Michelle (BOS) <michelle.andrews@sfgov.org>; Tam, Madison (BOS) <madison.r.tam@sfgov.org>; Rosas, Lorenzo (BOS) <Lorenzo.Rosas@sfgov.org>; Low, Jen (BOS) <jen.low@sfgov.org>; Fieber, Jennifer (BOS) <jennifer.fieber@sfgov.org>; Cooper, Raynell (BOS) <raynell.cooper@sfgov.org>; Sciammas, Charlie (BOS) <charlie.sciammas@sfgov.org>; Ho, Calvin (BOS) <calvin.ho@sfgov.org>; DorseyStaff (BOS) <DorseyStaff@sfgov.org>; Waltonstaff (BOS) <waltonstaff@sfgov.org>; Mathew Castillon <mcastillon10@gmail.com>; Lurie, Daniel (MYR) <daniel.lurie@sfgov.org>; Thongsavat, Adam (MYR) <adam.thongsavat@sfgov.org>; Zou, Han (MYR) <han.zou@sfgov.org>
**Subject:** San Francisco Eastern Neighborhoods Democratic Club (SFENDC) Support for Mayor

Lurie's Family Zoning Plan

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

December 2, 2025

RE: Support Mayor Lurie’s Family Zoning Plan

Dear Members of the Board of Supervisors,

The Board of the Eastern Neighborhoods Democratic Club (ENDC) supports the passage and adoption of Mayor Lurie’s Family Zoning Plan.

This proposal plans to build more housing for San Franciscans while ensuring we can control our own destiny by maintaining local land use controls. Without the Family Zoning Plan, San Francisco will face the Builder’s Remedy as well as fines and loss of ~$100 million in funding for transit and housing. Furthermore, this plan incentivizes family-sized homes of at least two, three, or more bedrooms. These types of homes help more families stay in San Francisco.

The plan aligns with ENDC's Mission & Vision. The San Francisco Eastern Neighborhoods Democratic Club (ENDC) was established by residents of San Francisco’s Supervisorial Districts 3, 6, and 10 to organize voters and provide a discussion and educational forum to address the most pressing issues facing the eastern neighborhoods of our City.

The ENDC provides a Democratic political voice to advocate an urbanist-equity platform (a focus on creating complete communities) with twin goals of keeping current residents and families in San Francisco while welcoming newcomers. The Family Zoning Plan aligns firmly with these values.

We are proud to support the Family Zoning Plan, which incorporates many important accepted amendments, and urge the Board of Supervisors to adopt the plan without delay.

Thanks in advance,

Bruce Agid
President, ENDC on behalf of the Board of ENDC

| | |
|---|---|
| **From:** | Richard Drury |
| **To:** | Board of Supervisors (BOS); MandelmanStaff (BOS); ChanStaff (BOS); SherrillStaff; SauterStaff; MelgarStaff (BOS); ChenStaff; MahmoodStaff; DorseyStaff (BOS); FielderStaff; Waltonstaff (BOS); Carroll, John (BOS); CPC.SF.Housing.Choice; CPC.FamilyZoningCEQA; Shum, Ryan (CPC) |
| **Cc:** | Lori Brooke |
| **Subject:** | Family Zoning Plan Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985 |
| **Date:** | Tuesday, December 2, 2025 9:02:54 AM |
| **Attachments:** | 2025.12.02.SF Rezone Supoplemental BOS ComLtr-PDF w Exhibit.pdf |

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

Dear Board of Supervisors:
Attached please find the supplemental comments of Neighborhoods United SF concerning the San Francisco "Family Zoning Plan." Board of Supervisors December 2, 2025. Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985.
Thank you for considering our comments, and please include these comments in the record for this matter.
Richard Drury

--
Richard Drury
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
(510) 836-4200
richard@lozeaudrury.com

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Oakland, CA 94612
www.lozeaudrury.com
richard@lozeaudrury.com

BY E-MAIL

December 2, 2025

Board President Rafael Mandelman and
Honorable Supervisors
San Francisco Board of Supervisors
Attn: Angela Calvillo, Clerk of the Board
Land Use and Transportation Committee c/o Clerk John Carroll
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Board.of.Supervisors@sfgov.org
mandelmanstaff@sfgov.org
ChanStaff@sfgov.org
SherrillStaff@sfgov.org
SauterStaff@sfgov.org
MelgarStaff@sfgov.org
ChenStaff@sfgov.org
MahmoodStaff@sfgov.org
DorseyStaff@sfgov.org
FielderStaff@sfgov.org
waltonstaff@sfgov.org
John.Carroll@sfgov.org
Lisa Chen, sf.housing.choice@sfgov.org
Ryan Shum, CPC, cpc.FamilyZoningCEQA@sfgov.org; ryan.shum@sfgov.org

**RE: Comment on CEQA Addendum for San Francisco "Family Zoning Plan."**
**Board of Supervisors December 2, 2025.**
**Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985**

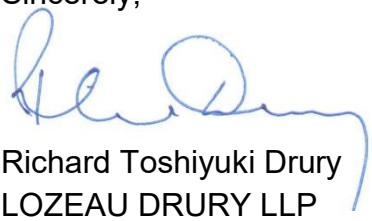
President Mandelman and Honorable Supervisors:

I am writing on behalf of Neighborhoods United SF, a consortium of San Francisco neighborhood and community groups representing thousands of San Francisco residents, concerning the so-called San Francisco "Family Zoning Plan" ("Rezone"). This letter supplements our filing yesterday in which we requested that the Board defer any decision on the Rezone until the City Planning Department prepares a Supplemental Environmental Impact Report ("SEIR").

We attach hereto the shadow "heat map" prepared by Adam Noble of FastCast showing that the Rezone will have dramatic shadow impacts on Joe DiMaggio Park. This is a zero-tolerance park under the City's Prop M (Planning Code Section 295). This is a new significant impact of the Rezone that must be analyzed in an SEIR, along with the

impacts discussed in yesterday's letter. We urge the City to prepare a SEIR to consider feasible mitigation measures to reduce the Rezone's impacts, and also to consider feasible alternatives, such as placing the proposed 4,000 additional units in specific locations, rather than upzoning entire swaths of the city in hopes that the 4,000 units will be built somewhere within the upzoned areas. We do not need to destroy the City to save it. Instead, the necessary new development can be place in areas of the City where it will not destroy rent-controlled housing and where it will not destroy functional, urban communities.

Sincerely,

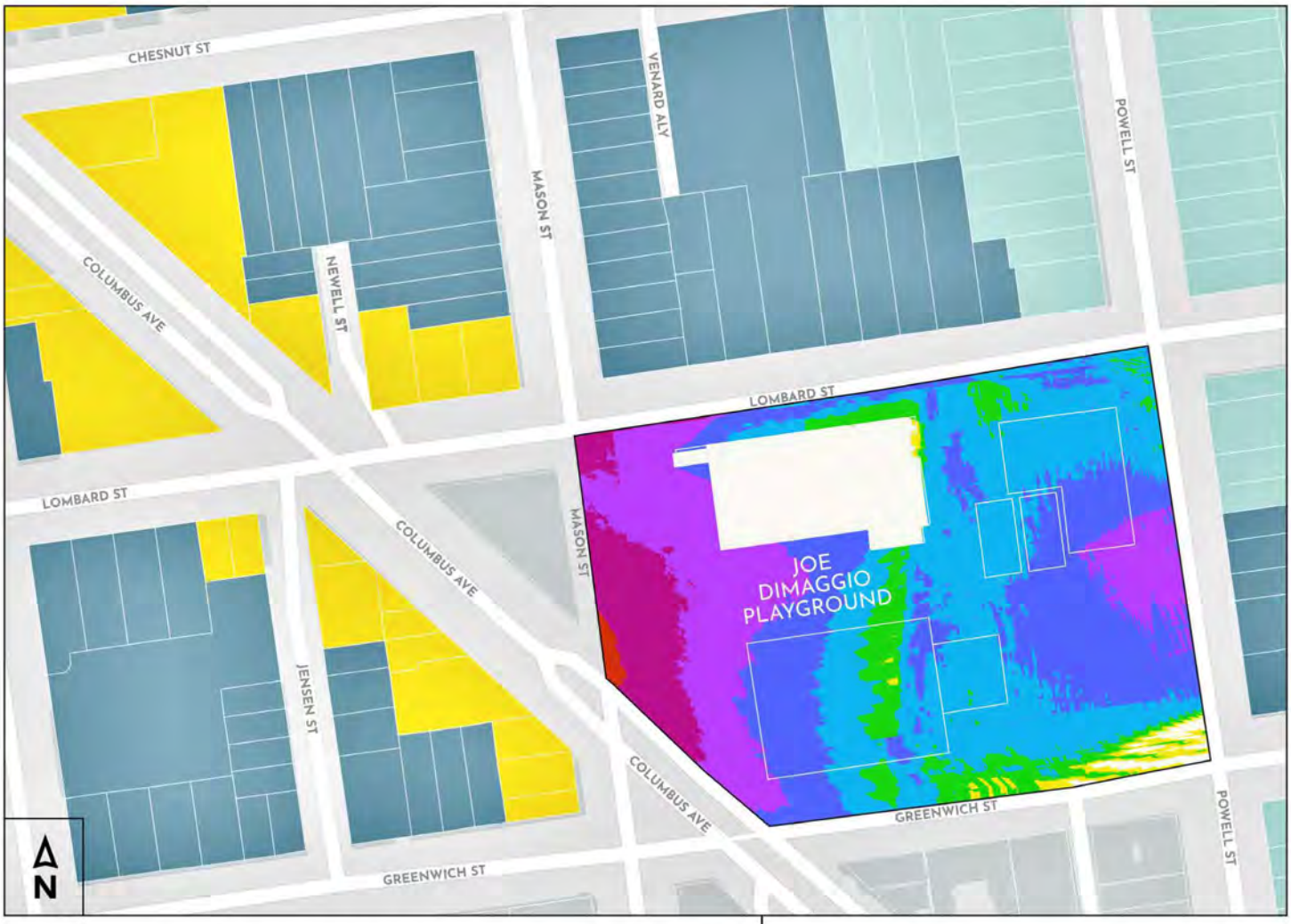


Richard Toshiyuki Drury
LOZEAU DRURY LLP

# FAMILY ZONING SHADOW ANALYSIS

**Joe DiMaggio Playground, Single Day**

EXHIBIT B




## NET NEW SHADOW LOCATIONS & DURATIONS

Full Year Distribution

### Duration Range of Net New Shadow

| | |
|---|---|
| Under 2 min/day | (under 13 hrs/year) |
| 2 - 4 min/day | (13 - 25 hrs/year) |
| 4 - 8 min/day | (25 - 49 hrs/year) |
| 8 - 16 min/day | (49 - 98 hrs/year) |
| 16 - 32 min/day | (98 - 195 hrs/year) |
| 32 - 64 min/day | (195 - 390 hrs/year) |
| 64 - 128 min/day | (390 - 779 hrs/year) |
| Over 128 min/day | (over 779 hrs/year) |

# FULL YEAR

### SHADOW FAN ANALYSIS

Rec & Park Open Spaces

Joe DiMaggio Playground*

Proposed Local Program Height Limits

40’

50’

65’

Shadow Fan is cropped to park boundaries

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# JUNE 21

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# JUNE 28

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# JULY 5

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# JULY 12

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# JULY 19

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# JULY 26

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# AUGUST 2

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# AUGUST 9

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# AUGUST 16

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# AUGUST 23

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# AUGUST 30

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# SEPTEMBER 6

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# SEPTEMBER 13

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# SEPTEMBER 20

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# SEPTEMBER 27

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# OCTOBER 4

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# OCTOBER 11

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# OCTOBER 18

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# OCTOBER 25

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# NOVEMBER 1

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# NOVEMBER 8

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# NOVEMBER 15

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# NOVEMBER 22

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# NOVEMBER 29

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# DECEMBER 6

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# DECEMBER 13

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40’
- 50’
- 65’

# FAMILY ZONING SHADOW ANALYSIS

## Joe DiMaggio Playground, Single Day




### NET NEW SHADOW LOCATIONS & DURATIONS

Single Day Distribution

**Duration Range of Net New Shadow**

- Over 16 hr
- 8 hr - 16 hr
- 4 hr - 8 hr
- 2 hr - 4 hr
- 1 hr - 2 hr
- 30 min - 1 hr
- 15 min - 30 min
- 1 min - 15 min

# DECEMBER 20

**SHADOW FAN ANALYSIS**

Rec & Park Open Spaces

- Joe DiMaggio Playground

Proposed Local Program Height Limits

- 40'
- 50'
- 65'

| | |
|---|---|
| **From:** | Kathryn Hyde |
| **To:** | Press Office, Mayor (MYR); Severiano.Christian@sen.ca.gov; Raayan.Mohtashemi@sen.ca.gov |
| **Cc:** | Carroll, John (BOS); Chan, Connie (BOS); MelgarStaff (BOS); Board of Supervisors (BOS); Hsieh, Frances (BOS); Mandelman, Rafael (BOS); Walton, Shamann (BOS); Andrews, Michelle (BOS); radhika.gawde@sen.ca.gov |
| **Subject:** | Re: housing SF |
| **Date:** | Monday, December 1, 2025 6:51:15 PM |

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

Dear Supervisors,

The City Economist's report shows clearly that Lurie's plan will not work and will trigger the State to hijack San Francisco's housing decisions. This is because zoning changes don't produce new affordable housing.

- We do not have the infrastructure, police force, roads, parking and water to support this plan.
- Structures should be limited to 5 stories to preserve lighting and wind

- Much of the new construction is poorly designed - i,e, Haight and Stanyan

- We are only 7 x 7 square miles. SF is not like cities that have space
- Concerns about earthquakes
- There is space to build on vacant lots, Walgreens sites, 7/11 on Clment/9th Ave., etc.
- No buildings close to the shoreline
- We still have 2 months to replace the Mayor's plan with one that will work. Here's a real strategy to solve the City's affordable housing crisis.

I favor producing housing out of existing vacancies and empty office space as much as possible, instead of building new units. New construction uses massive amounts of cement, wood, and diesel construction equipment, releasing more greenhouse gas emissions.

The Mayor's plan would build more excess housing for the wealthy, create more homelessness, and is an environmentally destructive giveaway to rapacious Wall Street and corporate real estate speculators.

Thank you!

Kathryn Hyde
130 Frederick St SF 94117

| | |
|---|---|
| **From:** | Kathy Howard |
| **To:** | ChanStaff (BOS); ChenStaff; DorseyStaff (BOS); Fielder, Jackie (BOS); MahmoodStaff; MandelmanStaff (BOS); MelgarStaff (BOS); SauterStaff; Walton, Shamann (BOS); SherrilStaff@sfgov.org; Board of Supervisors (BOS); Lurie, Daniel (MYR) |
| **Cc:** | Mcgarry, Sean (CPC); Campbell, Amy (CPC); Imperial, Theresa (CPC); Moore, Kathrin (CPC); Braun, Derek (CPC); So, Lydia (CPC); Williams, Gilbert A (CPC); Ionin, Jonas (CPC) |
| **Subject:** | BOS: Postpone vote on the "Family" Zoning plan. |
| **Date:** | Monday, December 1, 2025 9:11:37 PM |

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

Dear Supervisors,

The entire City voted on District 4's Great Highway, but once again **District 4**, through no fault of our own, **has NO voice in the upzoning legislation**. This is despite the fact that the upzoning legislation could result in bulldozing our entire neighborhood. We have had a new Supervisor all of one day and no easy way to contact him. He has not had time to hold neighborhood meetings; he has not had the opportunity to find out what his district thinks.

You should **postpone this vote** until we have had the opportunity to meet with our new Supervisor. *We are tired of being ignored*.

As to the legislation, many changes must be made:

- **Eliminate in-lieu fees**. In-lieu fees delay affordable housing and create exclusive enclaves of luxury housing.
- **Dedicate all suitable public land – excluding parks and public open space - to 100% affordable housing.**
- **Preserve the Coastal Zone as it is today.**
- **Prohibit upzoning in the Tsunami Zone.** It is reckless to increase building heights or density in areas at high risk of tsunami inundation.
- **Repair and reactivate the local tsunami warning system**.
- **Protect historic and culturally significant buildings, districts and open space.** All **Category A and A-eligible historic buildings, districts, and open space** should be exempted from upzoning. District 4's mid-century homes and civic buildings reflect our community's unique cultural heritage and deserve preservation.
- **Prevent height increases near parks and schools.** Casting shadows on open spaces

and classrooms undermines the very “well-resourced” character of our district that the City claims to value.

- **Install the emergency firefighting system before more density is built, or a major quake and the ocean winds could result in an unstoppable fire that will run from west to east over all of San Francisco.**

Thank you for your consideration of these points.

Sincerely,

Katherine Howard

Outer Sunset

District 4

| | |
|---|---|
| **From:** | deejoyce@everyactioncustom.com on behalf of Marie D. Joyce |
| **To:** | Board of Supervisors (BOS) |
| **Subject:** | Protect Our Neighborhoods — Reject Extreme Upzoning [Files: 250700, 250701, 250966] |
| **Date:** | Monday, December 1, 2025 9:37:39 PM |

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

Dear Board of Supervisors,

The Board of Supervisors now faces a Tuesday, 12/2 vote on the most massive zoning changes in San Francisco history. Yet without hearing a single public comment, less than a dozen people could allow sweeping redevelopment along our parks, beaches, waterfronts and thriving commercial corridors. Even more incredulously, one of those supervisors was just appointed today.

A proposal of this magnitude should go before voters on a citywide ballot. Back in 2013, voters resoundingly rejected a proposed "Wall on the Waterfront," which was merely one luxury project on the Embarcadero. But under the "Family Zoning Plan," huge swaths of our northern and western neighborhoods are now targeted - mainly for their potential high-rise iconic views. And this development can only be accomplished with a wrecking ball, which will also displace beloved small businesses and tenant neighbors.

As a 20-year San Francisco resident, I urge you to:.

- Drastically scale back the Mayor's upzoning maps
- Request a postponement of the arbitrary January 2026 upzoning deadline

Mayor Lurie's upzoning maps would impose permanent, irreversible changes to San Francisco's land use — going far beyond what is required, with zero affordability guarantees.

Together, these plans clear the way for mass demolition and luxury towers, prioritizing the interests of developers and billionaire investors while silencing the voices of the very communities they are supposed to represent. This is not planning — it is displacement disguised as progress.

Sincerely,
Marie D. Joyce
San Francisco, CA 94121

| | |
|---|---|
| **From:** | Richard Drury |
| **To:** | Board of Supervisors (BOS); MandelmanStaff (BOS); ChanStaff (BOS); SherrillStaff; SauterStaff; MelgarStaff (BOS); ChenStaff; MahmoodStaff; DorseyStaff (BOS); FielderStaff; Waltonstaff (BOS); Carroll, John (BOS); FamilyZoningCEQA@sfgov.org |
| **Subject:** | CEQA comments for Family Zoning Plan (Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985) |
| **Date:** | Monday, December 1, 2025 12:44:59 PM |
| **Attachments:** | 2025.12.01.SF Rezone BOS ComLtr-PDF w exhibits.pdf |

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

Dear Board of Supervisors and Land Use and Transportation Committee:
Attached please find the comments of Neighbors United SF concerning the Family Zoning Plan, (Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985). Thank you for considering these comments. Please include these comments in the record for this matter.
Richard Drury

--
Richard Drury
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richard@lozeaudrury.com

BY E-MAIL

December 1, 2025

Board President Rafael Mandelman and
Honorable Supervisors
San Francisco Board of Supervisors
Attn: Angela Calvillo, Clerk of the Board
Land Use and Transportation Committee c/o Clerk John Carroll
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Board.of.Supervisors@sfgov.org
mandelmanstaff@sfgov.org
ChanStaff@sfgov.org
SherrillStaff@sfgov.org
SauterStaff@sfgov.org
MelgarStaff@sfgov.org
ChenStaff@sfgov.org
MahmoodStaff@sfgov.org
DorseyStaff@sfgov.org
FielderStaff@sfgov.org
waltonstaff@sfgov.org
John.Carroll@sfgov.org
Lisa Chen, sf.housing.choice@sfgov.org
Ryan Shum, CPC, FamilyZoningCEQA@sfgov.org

**RE: Comment on CEQA Addendum for San Francisco "Family Zoning Plan."**
**Board of Supervisors December 2, 2025.**
**Board File Nos. 250966, 250700, 251071, 250701, 251073 and 250985**

President Mandelman and Honorable Supervisors:

I am writing on behalf of Neighborhoods United SF, a consortium of San Francisco neighborhood and community groups representing thousands of San Francisco residents, concerning the so-called San Francisco "Family Zoning Plan" ("Rezone"). We request that the Board defer any decision on the Rezone until the City Planning Department prepares a Supplemental Environmental Impact Report ("SEIR"). CEQA review would force the City to consider feasible mitigation measures to reduce the Rezone's impacts, and also to consider feasible alternatives, such as placing the proposed 4,000 additional units in specific locations (such as Park Merced, Stonestown, Treasure Island, Hunters Point, etc.), rather than upzoning entire swaths of the city in hopes that the 4,000 units will be built somewhere within the upzoned areas.

## I. INTRODUCTION

The Rezone will forever change the face of the City. It will allow new development to accommodate 54,000 new housing units in so-called "well-resourced" areas of the City.[1] While the City prepared an environmental impact report ("EIR") for its Housing Element in 2022 (2022 EIR), the proposed Rezone is vastly different from the zoning studied in the 2022 Housing Element and its associated 2022 EIR. Nevertheless, the Planning Department proposes to rely on the 2022 EIR.

A rezoning of this magnitude requires thorough environmental review under the California Environmental Quality Act ("CEQA") so that the City's residents and decision-makers can be aware of its impacts, can consider all feasible mitigation measures and alternatives, and can have a robust and open discussion prior to making irreversible changes to San Francisco's landscape for all time. The California Court of Appeal recently held that a supplemental EIR ("SEIR") is required for a general plan amendment that allows taller buildings than allowed by a prior plan (as here), and that the SEIR must analyze all of the increased impacts caused by the taller buildings. (*Save Our Access v. City of San Diego*, 2025 WL 2945714, 115 Cal.App.5th 388 (Cal. Ct. App. Oct. 17, 2025) (*Save Our Access II*); *Save Our Access v. City of San Diego*, 92 Cal.App.5th 819 (2023) (*Save Our Access I*).) Under the *Save Our Access* line of cases, an SEIR is clearly required for the Rezone since it allows vastly taller building heights, and includes different geographic areas than the 2022 Plan.

The Rezone will have myriad significant new impacts that were not analyzed in the 2022 EIR or included in the Housing Element.

- HISTORIC RESOURCES: The Rezone, unlike the Housing Element, will allow new, high-rise development in the historic northeast neighborhoods of North Beach and the Northern Waterfront, including Fisherman's Wharf– something not allowed or analyzed the 2022 EIR or Housing Element.
- HEIGHT LIMITS INCREASED: The Rezone, unlike the Housing Element, includes amendments to base zoning and base height limits, and creating new zoning for many areas. The Rezone will allow the construction of buildings up to 350-feet taller than anything analyzed in the 2022 EIR, resulting in new wind, aesthetic, biological and shadow impacts not analyzed in the 2022 EIR.

[1] While the Rezone purports to address racial disparities in the City by targeting "well-resourced" areas, the Rezone seems to focus on largely Asian "well-resourced" areas, such as the Sunset District, Richmond District, and Northeast, while leaving largely untouched predominantly Caucasian "well-resourced" area such as Pacific Heights, Marina and Seacliff. As such, the Rezone may have discriminatory impacts, much like the development of the Western Addition, or the City's historic bans on wood-framed buildings that targeted Chinese-owned businesses. (See, *Yick Wo v. Hopkins*, 118 U.S. 356, 6 S. Ct. 1064, 1065, 30 L. Ed. 220 (1886).) The City should analyze the potentially racially discriminatory impacts of the Rezone.

- HOUSING SUSTAINABILITY DISTRICT: The Rezone, unlike the Housing Element, establishes a housing sustainability district.
- WIND: The Rezone will create significant new wind impacts from vastly taller buildings, while at the same time the Rezone ordinance proposes to weaken the City's wind ordinance to eliminate the requirement for mandatory wind mitigation, and to redefine significant wind impacts from 1-hour to 9-hours – all of which will conspire to create significant new wind impacts far greater than anything analyzed or contemplated in the 2022 EIR.
- DISPLACEMENT OF RENT-CONTROLLED HOUSING: The Rezone will result in the displacement of rent-controlled tenants and legacy businesses, by replacing rent-controlled and existing affordable units with luxury, high-rise condos and allowing development in the areas within the Priority Equity Geographies Special Use District – something avoided in the 2022 Housing Element.
- AIR POLLUTION: The Rezone will create significant airborne cancer risks in newly identified APEZ zones (air pollutant exposure zones), and will result in criteria air pollution far above CEQA significance threshold set by the Bay Area Air District .
- SHADOW: The Rezone will create significant new shadow impacts due to much taller buildings.
- CONTAMINATED SITES: The Rezone will allow development on contaminated sites not analyzed in the 2022 EIR.
- TRAFFIC: The Rezone will create new significant air quality impacts from increased vehicle miles travelled (VMT), and from construction emissions.
- SEWAGE TREATMENT PLANT: The Rezone will allow development on the site of the North Point Wet Weather Sewage Treatment Facility, which will require either a replacement facility or vast amounts of infrastructure to transport sewage to other plants.
- NORTH BEACH SUD: The Rezone will have cumulative impacts with the recent repeal of the North Beach Special Use District, which removes protections for almost all historic resources in the North Beach area.
- GREAT HIGHWAY CLOSURE CUMULATIVE IMPACTS: The City has failed to analyze new changed circumstances, particularly the closure of the Great Highway, which will exacerbate significant traffic and public transit impacts on the Rezone, which adds thousands of new residential units to the Sunset and Richmond neighborhoods.

It is legally improper for the City to bypass CEQA review for the Rezone. Addenda are only allowed where '(2) Only **minor technical changes** or additions are necessary to make the EIR under consideration adequate under CEQA." (CEQA Guidelines §15164, subd. (a); *Save Our Heritage Organization v. City of San Diego*, 28

Cal. App. 5th 656, 664–65 (2018) (emphasis added). The Proposed Rezone in this case allows **increased height of up to 350-feet above those analyzed in the 2022 EIR**. (Addendum No. 1 to 2022 Housing Element Environmental Impact Report, ("Addendum") at p. 11). The 2022 EIR analyzed building heights of up to 300 feet for proposed buildings, which the Rezone allows building heights of up to 500 to 650 feet – 350 feet taller than anything analyzed in the 2022 EIR. (Addendum 11). These are not "minor technical changes," but rather major substantive changes with significant environmental impacts.

For these reasons, we ask the City to prepare a Supplement EIR to analyze the Rezone, and to consider feasible mitigation measures and alternative to reduce its myriad impacts.

## II. PROJECT DESCRIPTION

The Rezone proposes to add 54,000 new housing units to San Francisco, above levels that would occur without rezoning. The City contends that the Rezone is necessary to meet state-mandated Regional Housing Needs Assessment (RHNA) goals of 36,200 additional housing units. The 2022 Housing Element provided for 50,000 new units of housing, so the Rezone allows for significantly more housing – 4,000 additional units. The Rezone moves the proposed housing to different areas of the city where it will have far greater impacts to historic resources, air quality, transportation, displacement and other resources.

We are commenting on the version of the Rezone that has been provided to the public. However, we are aware that the Rezone is in a state of flux, as new amendments are being proposed on an almost daily basis. The Rezone is a moving target, which makes meaningful public comment all but impossible. "An accurate, stable and finite project description is the sine qua non of an informative and legally adequate EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192.) "[A] curtailed or distorted project description," on the other hand, "may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance." (*Id.* See also, CEQA section 15124.) The City has abjectly failed to provide the public with an accurate and stable project description that would allow meaningful comment. At the very least, the City should allow a 30-day public comment period between the first reading of the Rezone Ordinance at the Board of Supervisors, anticipated to occur on December 2, 2025 and the second reading. The Project description will not be stable until the December 2, 2025 vote. This will allow a 30-day period for the public to review and comment on the stable project description.

The Project description in the 2022 EIR simply does not accurately describe the Rezone project. As such, the City may not rely on the 2022 EIR, which describes a very different Project. Some courts have allowed agencies to rely on prior EIRs when the revised project has the same footprint or the same or reduced environmental impacts.

(*Sw. Reg'l Council of Carpenters v. City of Los Angeles* (2022) 76 Cal. App. 5th 1154). However, when, as here, the project's footprint is expanded, the project's height is increased, and/or the project's impacts are increased, a supplemental EIR is required. (*Save Our Access I and II*).

The City largely ignores or mischaracterizes the Rezone's environmental impacts. For example, the Addendum does not even mention the fact that the Rezone (unlike the 2022 Housing Element) will allow redevelopment in the northeast districts of Telegraph Hill, North Beach and the Northern Waterfront, including Fisherman's Wharf. The City also ignores the fact that it has already approved 71,772 new units of housing that have yet to be built. The City' RHNA goal is 82,069. Therefore, the City only needs another 10,297 units to meet its RHNA goal – not 36,200, or 54,000.[2] Nor does the City discuss the fact that the Rezone is likely to displace low-income residents from rent-controlled units, while constructing new market-rate units without rent-control. The Rezone does not require any affordable housing and allows rent-controlled units to be replaced with luxury housing. The net result is likely to be less affordable housing – not more. The City's own calculations show that the Rezone will abjectly fail to meet RHNA's affordable housing goals.

The City fails to accurately describe the Rezone project. The City calculates that the "realistic" projected build-out as a result of the Rezone will be 54,000 additional housing units – 4,000 more than analyzed in the 2022 EIR. However, the Rezone actually creates a capacity for an additional 800,000 housing units. Full build-out would more than double the population of the City. Even the City's own calculations estimate that the Rezone could result in a range of additional housing ranging from 64,000 units (soft sites method); 39,000 units (citywide capacity method); to 19,000 units (financial feasibility method). (SF Planning Dept., Family Zoning Plan Rezoning Capacity Calculations Fact Sheet). Since the City's own staff admits that these are all realistic scenarios, a CEQA document should be prepared to compare the environmental impacts of these feasible outcomes, as well as the full build-out scenario.

The Rezone is vastly different from the Housing Element analyzed in the 2022 EIR. Supplemental CEQA review is required to analyze the impacts created by these vast changes to the Housing Element. These major modifications are discussed in the attached letter from Certified Urban Planner, Deborah Holley. (Exhibit A). Ms. Holley provides a map showing that the Rezone adds massive amounts of new development to District 3 (North Beach, Fisherman's Warf), and District 8 (Mission/Noe Valley), none of which was even mentioned in the 2022 EIR.

- The 2025 Rezone adds 6,938 parcels and 12,150 units, that were not in the 2022 Housing Element.

[2] Housing and Community Development barely accounted for the capacity created by the 4-plex and 6-plex legislation passed in 2023. Roughly 120,000 parcels are eligible, and even a fraction of those converting to 4–6 units would generate hundreds of thousands of potential homes.

- The Rezone increases height on 7,580 parcels and 10,009 units, above heights analyzed in the 2022 EIR.
- The Rezone increases density on 16,135 parcels, with 16,135 units currently on those parcels.
- The Rezone adds 30,653 parcels with 38,692 units that were not analyzed in the 2022 EIR – mostly in District 3 and District 8.
- The Rezone almost doubles the square footage of developable land, increasing the amount by 254,211,574 square feet.

The Rezone opens up thousands of rent-controlled units for high density, market rate development, virtually ensuring that thousands of low-income residents will be displaced to make way for luxury housing. The Rezone includes 3,481 two-unit rent-controlled parcels with 32,237 units, increases height on 4,345 rent-controlled parcels with 26,784 units, an increases density on 1,341 rent-controlled parcels with 20,691 units. While the Board of Supervisors is considering amendments to protect rent-controlled units with 3 or more units, this leaves about 20,564 two-unit rent-controlled units (10,282 parcels) with absolutely no protection from displacement and redevelopment.

None of these impacts were proposed, discussed or analyzed in the 2022 EIR, and must be analyzed and mitigated in a supplemental EIR.

## III. LEGAL STANDARD.

### A. CEQA Addendum (Pub. Res. Code section 21166).

The City Planning Department proposes to approve the Rezone based on an Addendum to the 2022 Housing Element EIR. This is entirely inappropriate since, as discussed above, the Rezone adds 30,653 parcels that were not analyzed in the 2022 EIR. The proposed Rezone is vastly different from the project analyzed in the 2022 EIR, and will have significant new environmental impacts that must be analyzed in a Supplemental EIR. (SEIR).

The court of appeal has stated, “The addendum is the other side of the coin from the supplement to an EIR. This section provides an interpretation with a label and an explanation of the kind of document that does not need additional public review.” “It must be remembered that an addendum is prepared where ‘(2) **Only minor technical changes or additions are necessary to make the EIR under consideration adequate under CEQA; and (3) The changes to the EIR made by the addendum do not raise important new issues about the significant effects on the environment.**’ (CEQA Guidelines §15164 (a); *Save Our Heritage Organization v. City of San Diego*, 28 Cal. App. 5th 656, 664–65 (2018) (emphasis added).) Even a 15-foot increase in height for a residential building (increasing height from 75 feet to 90 feet) requires a supplemental EIR, not an addendum. “Accordingly, the appropriate protocol is to have the county draft and recirculate a focused supplemental EIR, limited solely to analysis of height and profile-related impacts of the medical clinic, as built and where built to a height of ninety feet.” *Ventura Foothills Neighbors v. Cty. of Ventura*, 232 Cal. App. 4th 429, 434, (2014).

Section 15164(a) of the CEQA Guidelines states that "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Pursuant to Section 15162(a) of the State CEQA Guidelines, a subsequent EIR or Negative Declaration is only required when:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
(C) Mitigation measures or alternatives previously found not to be feasible would, in fact, be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The "fair argument" standard applies to analysis under Section 21166 when the proposed project is outside the scope of the prior EIR. As the Court of Appeal recently held:

> We similarly apply the **fair argument** test to review an agency's determination whether to prepare a **new** or **supplemental EIR** in a later **new project** following certification of a **program EIR**. [Citation.] The Legislature's use of similar language in sections 21151 and 21094 indicate "it intended to establish a similar **low threshold** for an agency's determination **whether to prepare a new EIR** on a later new project that follows certification of a program or plan EIR. In other words, **if** there is **substantial evidence** in the record that the **later project may arguably have** a **significant adverse effect** on the environment

> which was **not examined in the prior program EIR, doubts must be resolved in favor of environmental review** and the agency **must prepare** a **new tiered EIR, notwithstanding** the existence of **contrary evidence**." [Citation.]
>
> (*Save Our Access I*, 92 Cal.App.5th at 860 [citing *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1320–1321] [emph. added].)

As the court held in *Save Our Access I*, a project that allows development of a greater height than analyzed in a prior programmatic EIR, is outside the scope of the prior EIR. (*Save Our Access I*, 92 Cal.App.5th at 845.) Therefore, the "fair argument" standard applies to subsequent projects that exceed the height limits in the program EIR. (*Id*. at 860). A project that includes geographic areas outside the scope of the prior program EIR is also subject to the fair argument standard. (*Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1320–1321). A subsequent project is not within the scope of a previous Program EIR if it is inconsistent with the plan addressed in the Program EIR. (14 CCR § 15168(c)(2); *see* PRC § 21094(b).) "**If the subsequent project is not consistent with the program or plan, it is treated as a new project and must be fully analyzed in a project—or another tiered EIR if it may have a significant effect on the environment.**" (*Friends of College of San Mateo Gardens v. San Mateo County Community College Dist*. (2016) 1 Cal.5th 937, 960 [emph. added]; *Save Our Access I,* 92 Cal.App.5th at 845.)

Since the Rezone allows vast swaths of development outside of geographic areas analyzed in the 2022 EIR, allows building heights of up to 350 taller than analyzed in the 2022 EIR, and allows development of historic resources and contaminated sites not analyzed in the 2022 EIR, the "fair argument" standard applies to the City's use of an Addendum. Under the fair argument standard, an EIR is required if there is a "fair argument" based on substantial evidence that the project may have any significant adverse environmental impacts. Pub. Res. Code § 21080(d).

**B. SB 131.**

The Addendum briefly argues that the recently passed SB 131 applies to some, but not all, of the Rezone. (Addendum 8). SB 131 exempts from CEQA review "a rezoning that implements the schedule of actions contained in an approved housing element pursuant to subdivision (c) of section 65583 of the Government Code." The City argues that this exemption applies to all but 3.4 percent of the parcels in the Rezone, which are excluded from SB 131 as "natural and protected lands." (Addendum 8).

The City misinterprets SB 131. First, the Rezone does not implement the approved 2022 Housing Element. In fact, the Rezone is flatly inconsistent with the 2022 Housing Element. Most obviously, the 2022 Housing Element included almost no new development in the historic Northeast sector of the city (800 units), while the Rezone allows 5,900 units in that area. (Addendum 19). The 2022 Housing Element provided for negative 1,800 units in Downtown, while the Rezone placed 500 units in the Downtown area. (Id.). The Rezone placed 2,800 additional units in the Western Addition. Also, the

Rezone allows construction of buildings up to 350 taller than allowed by the Housing Element. As discussed above, the Rezone adds 30,653 parcels that were not analyzed in the 2022 EIR. Since the Rezone is inconsistent with the 2022 Housing Element, SB 131 does not apply at all.

Second, SB 131 provides that it does not apply to "natural and protected lands," and the Rezone admittedly includes numerous parcels that meet this definition. (Pub. Res. Code § 21080.085).

> (a) This division does not apply to a rezoning that implements the schedule of actions contained in an approved housing element pursuant to subdivision (c) of Section 65583 of the Government Code.
> (b) (1) Subdivision (a) does not apply to either of the following:
> (B) A rezoning that would allow for construction to occur within the boundaries of any natural and protected lands as defined pursuant to Section 21067.5.
> (2) (A) (i) Subdivision (a) applies to a rezoning that contains within its boundaries any natural and protected lands as defined pursuant to Section 21067.5 if those natural and protected lands are excluded from the rezoning.
> (ii) The definition of "natural and protected lands" described in clause (i) does not include the lands described in subdivision (p) of Section 21067.5.
> (B) The rezoning of any parcel or portions of a parcel that is excluded from a rezoning under this paragraph shall be a separate project that is subject to this division.
>
> Public Resources Code §21067.5 defines "natural and protected land" as follows:
>
> "Natural and protected lands" means sites located within any of the following locations:
> (a) The state park system, as described in Article 1 (commencing with Section 5001) of Chapter 1 of Division 5.
> …
> (i) A hazardous waste site that is listed pursuant to Section 65962.5 of the Government Code or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code, unless either of the following apply:
> (1) The site is an underground storage tank site that received a uniform closure letter issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code based on closure criteria established by the State Water Resources Control Board for the use proposed by the project. This paragraph does not alter or change the conditions to remove a site from the list of hazardous waste sites listed pursuant to Section 65962.5 of the Government Code.
> (2) The State Department of Public Health, State Water Resources Control Board, Department of Toxic Substances Control, or a local agency making a determination pursuant to subdivision (c) of Section 25296.10 of the Health and Safety Code has otherwise determined that the site is suitable for the use proposed by the project.

> (j) Within a regulatory floodway as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency, unless the development has received a no-rise certification in accordance with Section 60.3(d)(3) of Title 44 of the Code of Federal Regulations.
> …
> (m) An environmentally sensitive area within the coastal zone, as defined in Section 30107.5…

The Addendum admits that at least 3.4 percent of the Rezone area are "natural and protected lands," within the meaning of SB 131. The Upzoning Plan includes several Cortese List contaminated sites. Several of these sites are "active," meaning that they have not be remediated. We have retained a hazardous materials expert to identify all of the Cortese List sites covered by the Upzoning. But we have already identified at least nine active Cortese List sites in our informal review, including 1100 JUNIPERO SERRA BLVD; and 300 W PORTAL AVE. The Rezone also includes parcels in listed flood zones. The Rezone also includes environmentally sensitive areas in the Coastal zone. These areas are expressly excluded from SB 131 and render the entire Rezone project ineligible for an SB 131 exemption.[3]

## IV. CEQA ANALYSIS.

### A. HISTORIC RESOURCES.

The Rezone will have significant historic resources impacts that were not analyzed in the 2022 EIR. The 2022 EIR found significant and unmitigated impacts to historic resources, (Addendum 60), but the Rezone's impacts are far greater and also significant and unmitigated. (Addendum 61). Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).)

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[3] The Addendum suggests that it can review the Rezone using a hybrid approach – reviewing the natural and protected lands under CEQA section 21166, and the remainder of the Project under SB 131. However, CEQA prohibits such a schizophrenic analysis. Under CEQA, the agency must review the "whole of the action" in a single document. A "project" is "the whole of an action" directly undertaken, supported, or authorized by a public agency "which may cause either a direct physical change in the environment, or a reasonably foreseeable ***indirect*** physical change in the environment." (PRC § 21065; CEQA Guidelines, 14 CCR § 15378(a).) A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole. "The requirements of CEQA, 'cannot be avoided by chopping up proposed projects into bite-size pieces which, individually considered, might be found to have no significant effect on the environment or to be only ministerial.' [Citation.]" (*Topanga Beach Renters Assn.* v. *Department of General Services* (1976) 58 Cal.App.3d 188, 195-196 [129 Cal.Rptr. 739].)

We submit herewith the comments of Architectural Historian Bridget Maley, former President of the San Francisco Landmarks Advisory Board. (Exhibit B). She states:

> The Rezone would result in a myriad of significant new impacts that were not analyzed in the 2022 EIR or included in the Housing Element, not the least of which are impacts to historic resources. The Rezone will have significant historic resources impacts that were not analyzed in the 2022 EIR. The 2022 EIR found significant and unmitigated impacts to historic resources, but the Rezone's impacts are far greater, with significant and unmitigated impacts. Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).)
>
> The Rezone allows high-rise development on, near, or within areas that contain historic resources. Many of these areas were not included for development in the 2022 Housing Element, and the impacts of this potential development on historic resources was not analyzed in the 2022 EIR.
>
> Further, the Rezone includes the following language related to Bonuses for "Historic Preservation." However, these bonuses, as shown below, encourage height increases, facadism, and other over-scaled additions that would result in diminished historic fabric and result in unintended impacts to historic resources. Additionally, this proposed legislation added at the last minute in the September 11, 2025 version of the legislation, and has not been evaluated in the Addendum or in a SEIR.
>
> (Maley at 2-3).

Maley goes on to discuss provisions of the Rezone that encourage development of historic buildings. She states, "This late addition to the legislation has the great potential to cause impacts to historic resources, instead of preserving them, as it would allow large sections of historic buildings to be demolished and over scaled additions and height increases to be implemented as bonuses. For the reasons listed above, it is my professional opinion that the Rezone, if approved, would have potentially significant environmental impacts that must be analyzed and mitigated under the California Environmental Quality Act ("CEQA") through a full recirculated SEIR." (Id. at 4).

The 2022 EIR assumed that historic buildings (Category A resources) would not be redeveloped for housing. (2022 EIR, App. C, pp. 10, 17). The 2022 EIR stated, "The department's housing growth projection factored in the locations of known historic districts in San Francisco and assumed that future development would primarily occur outside those districts." (2022 EIR p. 4.2-82). The HE EIR conceded that its "analysis cannot anticipate the exact manner in which future construction may be designed or whether such projects will propose altering or demolishing historic resources." (2022 EIR p. 4.2-85.) The 2022 EIR stated:

> The representative pattern of growth depicted in the department's projection of future housing units under the Housing Element 2022 Update takes into account

> the presence of individual built-environment historic resources and historic districts identified as of 2021 (including resources designated or found eligible for listing in local, state, and federal historic resource registers). Specifically, the projection assumes future housing construction would be less likely to occur on parcels that currently contain Category A resources (i.e., properties that are already known to qualify as historic resources)... This assumption reflects that Category A resource status would act as a development constraint for future housing development construction. Additionally, the planning department did not increase height limits in historic districts identified in [the Planning Code]. (2022 EIR, App. C, pp. 10, 17.)

However, the Rezone now identifies numerous historic resources for upzoning for residential development, contrary to the analysis in the 2022 EIR.

The 2022 EIR concluded that any impacts to historic resources would be significant even after mitigation. By increasing impacts to historic resource, the 2025 Rezone will have "significant effects previously examined will be substantially more severe than shown in the previous EIR," and a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).) The 2022 EIR concluded that even with the implementation of mitigation, impacts to "project-level and cumulative: built-environment historic resources" would be significant and unmitigated. (2022 EIR p. S-4.) "Because demolition of built-environment historic resources or alteration in an adverse manner could still occur, the impact would be significant and unavoidable with mitigation." (2022 EIR, p. 4.2-100.)

In *Communities for a Better Environ. v. Calif. Resources Agency* (2002) 103 Cal.App.4th 98 at 122-125 (*CBE v. CRA*), the court held that when a "first tier" EIR admits a significant, unavoidable environmental impact, a lead agency must prepare second tier EIRs for later projects to ensure that those unmitigated impacts are "mitigated or avoided." (Id.) The court reasoned that the unmitigated impacts were not "adequately addressed" in the first tier EIR since they were not "mitigated or avoided." (Id.) Thus, significant effects disclosed in first tier EIRs will trigger second tier EIRs unless such effects have been "adequately addressed," in a way that ensures the effects will be "mitigated or avoided." (Id.) Such a second tier EIR is required even if the impact still cannot be fully mitigated and a statement of overriding considerations will be required. The court explained, "The requirement of a statement of overriding considerations is central to CEQA's role as a public accountability statute; it requires public officials, in approving environmentally detrimental projects, to justify their decisions based on counterbalancing social, economic or other benefits, and to point to substantial evidence in support." (Id. at 124-125.) Since the 2022 EIR determined that impacts to historic resources would be significant and unmitigated, supplemental CEQA review is required for the 2025 Rezone, which increases impacts to historic resources.

The Rezone allows high-rise development in the Northeast Sector of the City, including in the historic district of North Beach. These areas were not included for development in the 2022 Housing Element, and the impacts of this development on historic resources was not analyzed in the 2022 EIR. By moving over 5000 units of new housing to this area, the Rezone exacerbates the impact on historic resources. Since this

is “one or more significant effects not discussed in the previous EIR,” (CEQA Guidelines 15162(a)(3)(A)), a supplemental EIR is required to analyze and mitigate this impact. Since this impact is beyond the scope of the 2022 EIR, it is subject to the fair argument standard.

The Housing Element EIR Addendum fails to analyze impacts of additional height and density increases, as well as changes in zoning use districts, on designated historic resources or historic districts or areas with known concentrations of “A” rated historic resources, but not yet designated as historic districts. Bridget Maley’s letter includes a listing of historic resources adversely affected by the Rezone. Impacts to these historic resources were not analyzed in the 2022 EIR and must be analyzed in a Supplemental EIR. That list included herein by reference. It includes, but is not limited to:

- Fully documented North Beach National Register Historic District submitted to the State Historic Preservation Office and awaiting hearing by the State Historical Resource Commission was not included in the 2022 Housing Element or analyzed in the 2022 EIR .The Rezone could have significant impacts to this identified historic district, including heights rezoned from 40 feet to 50 feet in block Block 0076.
- Designated Northeast Waterfront Article 10 Historic District.
- Eligible Washington Square Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Eligible Upper Grant Avenue Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR .
- Designated Otis Elevator Company National Register No. 99001265 (1 Beach Street; Parcel 0018/001).
- Designated Grabhorn Press Building National Register No. 97000349 (1335 Sutter Street; Parcel 0690/012A).
- Designated Thomas Payne House National Register No. 80000847 (1409 Sutter Street; Parcel 0689/025). This parcel is rezoned from its existing height limit of 130 feet to 500 feet.
- Designated Washington Square Article 10 Landmark No. 226 ( 1651 Stockton Street and Filbert Street; 0102/022001) . The parcels on the northern edge of Washington Square are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the 2022 EIR . This could result in significant impacts to this park.
- Temple Sherith Israel National Register #10000114 (2266 California St., Parcel 0637/011).

- Designated Cable Car National Register Historic District No. 66000233. The Cable Car lines located within areas being upzoned and/or density decontrolled by the Upzone Plan could be significantly impacted.
- Designated Grace Cathedral Article 10 Landmark No. 170 (1100 California Street; Parcel 0246/001). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR.
- Designated Old Flood Mansion, Pacific Union Club, both Article 10 Landmark No. 64 and National Register No. 66000230 (1000 California Street; Parcel 0245/001).
- Historic Category "A" rated buildings across the city would be impacted by the Rezone as it affords no protection for these previously identified but not designated historic resources. The City of San Francisco Planning Department has previously required full Historic Resource Evaluations for projects involving Category "A" rated buildings. This policy change was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Casebolt House Article 10 Landmark No 51 (2727 Pierce Street, Parcel 0560/005). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Spreckels Residence Article 10 Landmark No. 197 (2080 Washington Street, Parcel 0601/005. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.
- Haas-Lilienthal House Article 10 Landmark No. 69 and National Register No 730000438 (2007 Franklin St. 0600/002). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.
- Sacred Heart Parish Complex Article 10 Landmark No.316 and National Register 10000112 (660 Oak Street, Parcel 0828/012; 735 Fell Street, Parcel 0828/022A; 554 Filmore Street, Parcel 0828/22; and 546-548 Filmore Street, Parcel 0828/21). The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the EIR.
- Many other historic buildings listed in letter of Bridget Maley.

**B. HEIGHT AND RELATED IMPACTS.**

The Rezone will allow construction of buildings up to 350-feet taller than analyzed in the 2022 EIR. The 2022 EIR analyzed building height ranging from 55 feet to 300 feet high. (Addendum 11). The Rezone allows building heights up to 500 feet high, and up to 650 feet high in two areas. (Addendum 11). These taller buildings are beyond the scope of the 2022 EIR, triggering the fair argument standard of review, as in the *Save Our Access* cases, discussed above. As the court of appeal held in *Save Our Access II*, supplemental CEQA review is required to analyze all of the impacts stemming from the greater building heights allowed by the Rezone.

**1. Biological Impacts.**

The Addendum admits that taller buildings may have biological impacts by obstructing flight paths of birds and impacting movement of special status species. (Addendum 48-49). The 2022 EIR found biological impacts to be less than significant. Since the Rezone will have significant biological impacts, the project will have "one or more significant effects not discussed in the previous EIR," (CEQA Guidelines 15162(a)(3)(A),) and a supplemental EIR is required.

The 2022 EIR did not analyze biological impacts since it found the impact to be less than significant. (2022 EIR, p. 4.1-1.) Since the EIR found biological impacts to be less than significant, it imposed no mitigation measures. (2022 EIR, p. 4.1-149.) Since biological impacts were not examined as significant effects in the 2022 EIR, CEQA review is now mandated because the project will have one or more significant effects not discussed in the previous EIR or negative declaration. (CEQA Guildelines 15163(a)(3)(A)).

Expert wildlife biologist Dr. Smallwood, Ph.D., concludes that the 2025 Rezone will have significant biological impacts not analyzed in the 2022 EIR. (Exhibit C). Dr. Smallwood concludes that by adding 4,000 additional residential units, changing the spatial distribution of the buildings, and increasing building heights, that the Rezone will have greater impacts on birds than the 2022 Plan. In particular, he concludes that the Rezone will have greater impacts on bird-window collisions, and that these impacts will not be adequately mitigated by the City's bird-safe window requirements. (Smallwood at 2-3). Dr. Smallwood states, "the additional 4,000 residential units could result in very large numbers of collision fatalities despite implementation of the City's Standards for Bird-Safe Buildings." (Id. at 3).

Dr. Smallwood notes that San Francisco includes areas in the Pacific Flyway and areas that are rich in biological diversity. He states, "San Francisco is situated within the Pacific Flyway, which is one of the most intensely used bird migration pathways in the world." (Id. at 13). He states that "there are 147 special-status species of wildlife documented near enough to the project site to warrant a closer look at their occurrence likelihoods for the purpose of predicting potential project impacts." (Id.at 3). Dr. Smallwood concludes that the 2025 Rezone will result in 7,095 additional bird fatalities each year compared to the 2022 Plan, to a 95% confidence level. (Id. at 12). Dr. Smallwood concludes:

> Nearly all predicted deaths would be of birds protected under the Migratory Bird Treaty Act and under the California Migratory Bird Protection Act, thus causing significant impacts. Given the predicted level of bird-window collision mortality, it is my opinion that the proposed project would result in potentially significant adverse biological impacts, including the unmitigated take of aerial habitats of birds, bats and other volant wildlife. Not only would the project take habitat of rare and sensitive species of birds, but it would transform the building's airspace into a lethal collision trap to birds. (Id. at 13).

Dr. Smallwood concludes that CEQA review is required to analyze patterns of bird movement through the City and to propose feasible mitigation measures and alternatives to avoid impacts. (Id. at 17).

**2. Wind.**

The 2022 EIR concluded that the Housing Element would have significant and unmitigated wind impacts. (Addendum 99). The 2022 EIR did not analyze the impacts of the taller buildings allowed in the 2025 Rezone. The 2022 EIR assumed that projects would "stay within existing height limits." (2022 EIR, App. C, p. 17, 3.)

The Addendum admits that the Rezone will have significant unmitigated wind impacts. (Addendum 108). It concluded that buildings over 85-feet tall would have significant wind impacts. (Addendum 104). The Rezone will add taller buildings over 85-feet to more areas of the City, resulting in much greater wind impacts. Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," (CEQA Guidelines 15162(a)(3)(B)), a supplemental EIR is required.

The Rezone allows buildings of up to 650-feet tall in certain areas. It allows increased heights along Market Street between Castro and Van Ness. Up to 160 feet. (Addendum 100). The Rezone allows 85-feet heights along Geary, and up to 300 feet at Geary and Masonic. (Addendum 101). The height difference between the rezoned blocks and the surrounding blocks with low heights would result in wind speeds that would likely exceed the hazard criteria. (Addendum 102).

The 2022 EIR stated, "Wind impacts are generally caused by large building masses that are substantially taller than their surroundings." (2022 EIR, p. 4.7-2.) The 2022 EIR states, "All projects greater than 85 feet In height would require a screening-level assessment conducted by a qualified wind expert in consultation with the department to determine their potential to result in a new wind hazard exceedance or aggravate an existing pedestrian-level wind hazard exceedance defined as the one-hour wind hazard criterion with a 26 mph equivalent wind speed." (2022 EIR, p. 4.7-11.) Since the Rezone will allow much taller buildings, well over 85-feet tall and up to 650-feet tall, it will have significant wind impacts under the standards set forth in the 2022 EIR, and an SEIR is required to analyze and mitigate these impacts.

The Rezone includes a change to the City's wind ordinance that requires CEQA review for buildings over 85 feet. The Rezone proposes to change the hazard criterion such that proposed development must not create any net new exceedance of 26 MPH wind speed for nine hours or more in a year, rather than one hour. (Addendum 104). In other words, after the Rezone, a building may cause hazardous wind conditions for a full workday, which is not currently allowed. The Rezone also eliminates an existing code requirement for "landscaping and/or wind baffling measure shall be installed on the windward side .. of the areas of concern.:" (Addendum 109).

By allowing vastly greater building heights, and eliminating previously existing mitigation standards and mitigation measures, the Rezone will have much greater wind

impacts that were never analyzed in the 2022 EIR. A supplemental EIR is required to analyze these wind impacts because "significant effects previously examined will be substantially more severe than shown in the previous EIR," (CEQA Guidelines section 15162(a)(3)(B)), and "Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative." (CEQA Guidelines section 15162(a)(3)(D)).

**3. Shadow.**

The vastly taller buildings allowed by the Rezone will have significant shadow impacts exceeding the City's CEQA significance thresholds. The 2022 Housing Element had significant unmitigated shadow impacts on Duboce Park, Larsen Playgrond, and Laurel Hill Playground.(Addendum 110-111). The Rezone creates new significant unmitigated shadow impacts on public parks including but not limited to, Noe Valley Town Square and Helen Wills Park, (Addendum 111, 113, 119) and on other parks and open spaces in areas added by the Rezone to the Northeast District including Washington Square, Joe DiMaggio Playground, and Levi Plazza Park. A supplemental EIR is required to analyze these impacts because "significant effects previously examined will be substantially more severe than shown in the previous EIR," (CEQA Guidelines section 15162(a)(3)(B))

We submit herewith the analysis of shadow expert Adam Noble of the consulting firm FastCast. (Exhibit D). Mr. Noble concludes that the Rezone will result in net new shadow impacts on Joe DiMaggio Playground not analyzed in the 2022 EIR. This is a zero-tolerance park, not allowed to have any additional shadow under CEQA and Measure M (Planning Code Section 295). Mr. Noble's analysis shows that on certain periods of the year and times of day, the Rezone will more than double the amount of shadow on Joe DiMaggio Park.

The City contends that a project that adds new shadow to sidewalks or a publicly accessible open space (whether subject to Section 295 or not) does not necessarily result in a significant impact under CEQA. The shadow impact analysis described in the city's Initial Study CEQA Checklist examines whether a project would "***create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces***".

Under planning code section 295 and the joint Planning Commission/Recreation and Park Commission criterion, the impact of any amount of shadow cast by a project on public parks, open spaces, or recreational facilities under the jurisdiction of SFRPD would be considered "significant" if it would affect a facility with an established quantitative limit.

Joe DiMaggio Playground has an established quantitative limit of zero, and as detailed below, the proposed rezoning would have a net increase in shadow cast on the playground, and would therefore, result in a significant impact.

In assessing impacts per the City's CEQA significance criterion, the environmental review requires evaluation of quantitative and qualitative factors but requires ***use and enjoyment of the park or public space to be substantially and adversely affected for the impact to be "significant."*** Therefore, the City contends that in certain situations, new shadow effects on an open space might not be a significant environmental impact under CEQA but could be found to be significant under planning code section 295. (Housing Element EIR p 4.8-17)[4]

Because Joe DiMaggio playground is heavily used throughout all periods of the day throughout the year by residents from the neighborhood and nearby neighborhoods, as well as schools for P.E. classes, the additional shadow would adversely and substantially impact the use and enjoyment of the park.

As detailed in Mr. Noble's analysis, this would be particularly true for fall periods when shadow impacts would be the most significant and lower temperatures create a greater need for sunlight to be able to enjoy the park.

## C. DISPLACEMENT.

The Addendum admits that the Rezone will result in displacement of low-income residents, small businesses, and legacy businesses. (Addendum 37-38). The Addendum states, "new market-rate housing development may contribute to indirect displacement of lower-income communities in San Francisco." (Addendum 37). It continues, "there could be a connection between market rate housing development and displacement." (Addendum 38). By allowing more market rate housing in the Rezone than in the 2022

[4] Commenter disputes the City's shadow impacts methodology because it conflicts with well-established court of appeal precedent. Where a local or regional policy of general applicability, such as an ordinance, is adopted in order to avoid or mitigate environmental effects, a conflict with that policy in itself indicates a potentially significant impact on the environment. (*Pocket Protectors v. Sacramento* (2005) 124 Cal.App.4th 903.) Indeed, any inconsistencies between a proposed project and applicable plans must be discussed in an EIR. (14 CCR § 15125(d); *City of Long Beach v. Los Angeles Unif. School Dist.* (2009) 176 Cal. App. 4th 889, 918*; Friends of the Eel River v. Sonoma County Water* Agency (2003) 108 Cal. App. 4th 859, 874 (EIR inadequate when Lead Agency failed to identify relationship of project to relevant local plans).) A Project's inconsistencies with local plans and policies constitute significant impacts under CEQA. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4; *Georgetown Preservation Society v. County of El Dorado* (2018) 30 Cal.App.5th 358.) Since the Rezone Project has significant impacts under Prop M (Section 295), it also has significant impacts under CEQA. However, because the Rezone Project has significant shadow impacts even under the City's improperly narrow interpretation of the law, the issue is moot.

Housing Element, this displacement impact will be exacerbated. According to an economic analysis prepared by the San Francisco Office of the Controller, as a result of Rezone 500 to 1,000 additional units would be demolished over 20 years. Many of these units will be rent-controlled (pre-1979) units since these properties will have the lowest land value. This is very different than the 2022 Housing Element, which avoided Priority Equity Geographies (PEGs), where lower income residents live. By contrast, the Rezone includes large PEG areas, where displacement is inevitable.

While the Supervisors are considering measures to provide some protection for rent-controlled properties with 3 or more units, this does nothing to protect the thousands of duplex rent-controlled properties found throughout the Richmond and Sunset Districts and elsewhere in the City. Ms. Holley calculates that the Rezone will affect 3,838 2-unit rent-controlled parcels with 7,676 rent-controlled units. Holley states (Exhibit A):

> under the rezoning, there are a significant number of two-unit rent-controlled buildings on parcels with an existing height limit of 40 feet that would be rezoned to allow heights of 50', 65' and 85', and would no longer require setbacks, creating greater incentives and likelihood that they would be redeveloped under the proposed rezoning.

Also, the Rezone allows increased development in North Beach and the Western Addition (Addendum 19), which include high levels of rent-controlled units and Priority Equity Geographies, which were excluded from development in the 2022 Housing Element. San Francisco Planning Code states that "The Priority Equity Geographies SUD is comprised of areas or neighborhoods with a higher density of vulnerable populations" and that the 2022 Update of the Housing Element of the General Plan ((2022 Housing Element) identifies them as "areas…where zoning changes must be tailored to serve the specific needs of the communities that live there; and where programs that stabilize communities and meet community needs need to be prioritized."

The Rezone shifts 5,100 units of housing to the Northeast District, (Addendum 19) which is home to the highest percentage of rent-controlled units in the City. The Rezone adds 939 parcels in PEG areas, with 2,321 units, including 70 two-unit rent-controlled buildings with 140 units.

Urban Planner Deborah Holley states, "The inclusion of parcels in the Priority Equity Geographies SUD and the associated displacement impacts need to be identified and assessed in a supplemental EIR."

Allowing this development and displacement in the Priority Equity Geographies SUD is flatly inconsistent with the 2022 EIR and the 2022 Plan since the stated purpose of the 2022 Plan was to focus development on "well-resourced areas" and away from Priority Equity Geographies. The 2025 Rezone does the exact opposite of the stated goal of the 2022 Plan, which is an obvious inconsistency requiring supplemental CEQA review.

Ms. Holley also points out that the Rezone for the first time adds Laguna Honda Hospital. Redevelopment of this parcel would result in massive displacement. Ms. Holley

states, “The 62-acre Laguna Honda hospital and rehabilitation center located 375 Laguna Honda Boulevard was added to the rezoning plan, and if redeveloped would result in significant displacement impacts for the long-term nursing home residents. Laguna Honda has 769 beds and offers short-term rehab and long-term nursing care…The FEIR did not address the impacts of redevelopment of Laguna Honda with housing because this site was not designated for rezoning. The rezoning program changes the allowable height limit on this site from 40’ which covers the majority of the 62 acres under existing height limits, to 85’ for the entire site, and increases the likelihood that it would be redeveloped with housing.”

Displacement is an environmental issue under CEQA. (*Save Berkeley Neighborhoods v. Regents* (2020) 51 Cal.App.5th 226, 233 (displacement of tenants is a CEQA impact)). CEQA requires the lead agency to determine whether the “environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly,” (PRC § 21083(b)(3), (d)). CEQA Guidelines Appendix G, Section XII provides that a project will have significant impacts where it will:

- Induce substantial population growth or concentration of population in an area, either directly (for example, by proposing new housing or businesses), or indirectly (for example, through extension of roads or other infrastructure);
- Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere; or
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. See CEQA Guidelines Appendix G, Section XII.

The Addendum suggests vague mitigation measures such as “advancing equitable housing access, promoting racial and social equity, and eliminating displacement with strategies such as tenant protections, preservation of affordability, production of affordable housing, and advancing equitable access to housing resources and affordable units.” However, these are vague and unenforceable measures. The Addendum fails to propose any binding and enforceable mitigation measures, such as requiring the mandatory construction of affordable housing, requiring payment for the construction of affordable housing, or requiring public lands to be used for 100% affordable housing. In fact, the city is reversing or weakening all of these requirements. The 2025 Rezone requires absolutely no affordable housing.

A public agency may not rely on mitigation measures of uncertain efficacy or feasibility. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 727.) “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (14 CCR § 15364.) Mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments. (14 CCR § 15126.4(a)(2).) In fact, proposals to provide benefits to legacy businesses, may not be legally allowable, let alone, legally enforceable. (*City of Santa Barbara v. Adamson* (1980) 27 Cal.3d 123, 134.)

The Rezone is reminiscent of the City's "urban renewal" of the Western Addition in the 1960s and 1970s, which wiped out what was at that time one of the most ethnically diverse communities in the United States and displaced much of the City's African-American community. Like the current "Family Zoning Plan," the urban renewal of the Western Addition was justified by the alleged need for more affordable housing. However, to make way for the new housing, the City destroyed a thriving African-American, Latino and Asian-American community, which never fully recovered, and the new housing was occupied largely by wealthier, white residents. The main difference is that the 2025 Family Zoning Plan is now targeting the City's Chinese Community, in the Richmond and Sunset Districts, which will undoubtedly face widescale displacement under the Rezone. This form of "White Urbanism" is now well-documented. (See, e.g,, Goetz, Whiteness and Urban Planning, *Journal of the American Planning Association*, Vol 86 (2020).)

The Federal Reserve Bank has concluded that supply-side constraints such as zoning and environmental regulation have absolutely no impact on housing costs. The single most significant factors driving high housing costs are extreme wealth disparities, and remote work. (Federal Reserve Bank of San Francisco, J. Mondragon, Supply Constraints Do Not Explain House Price and Quantity Growth Across U.S. Cities (2025), https://www.frbsf.org/research-and-insights/publications/working-papers/2025/03/supply-constraints-do-not-explain-house-price-and-quantity-growth-across-u-s-cities/); Federal Reserve Bank, J. Mondragon, Housing Demand and Remote Work (2025), https://www.nber.org/papers/w30041). Building more luxury housing does not decrease housing costs and in fact often leads to gentrification of previously affordable neighborhoods. Trickle-down economics did not work in the Reagan Administration and it will not work now.

Since the Rezone will displace both existing housing and people, it will have a significant impact that must be analyzed in a supplemental EIR. The SEIR must consider mitigation measures and feasible alternatives to reduce this impact.

## D. AIR QUALITY AND CANCER RISK.

The Addendum admits that the Rezone will create significant air quality impacts, including additional cancer risk from fine particulate matter, known as PM-2.5. (Addendum 95). The Housing Element EIR admitted significant unmitigated PM-2.5 cancer risk (Addendum 90), but the Rezone will have even greater air quality and cancer risks since it allows more development and taller buildings, and will result in more vehicle miles traveled (VMT). (Addendum 90, 92-93).

The 2022 EIR concluded that buildings under 240-feet and 495 units would have less than significant construction air quality impacts. (Addendum 89). Taller buildings have significant PM-2.5 and nitrogen oxide impacts. (Addendum 94). But allowing taller and larger buildings, the Rezone will create more significant construction air quality impacts, including emissions of cancer-cause PM-2.5. The Rezone will have significant unmitigated cancer risk from PM-2.5 and the Rezone will change the distribution of those risks compared to the Housing Element. (Addendum 95).

The 2022 EIR concluded that even with the implementation of mitigation, air quality impacts would be significant and unmitigated. (2022 EIR, p. S-4, 4.6-56, 4,6-70.) By adding another 4,000 housing units, the 2025 Rezone will have "Significant effects previously examined will be substantially more severe than shown in the previous EIR." (CEQA Guidelines §15164(a)(3)(B).)

Attached hereto are the comments of Dr. Paul Rosenfeld and Matthew Hagemann, P.G., C. Hg., of the environmental consulting firm Soil, Water, Air Protection Enterprise (SWAPE). (Exhibit E). SWAPE notes that the Addendum erroneously states, "The proposed rezoning program and subsequent development is expected to result in the same significant criteria air pollutant impacts from construction but not substantially more severe impacts than those disclosed in the EIR" (Addendum 93). However, SWAPE points out that by adding 4,000 additional residential units, the Rezone vastly exceeds air quality significance threshold set by the Bay Area Air District ("BAAD").

The Bay Area Air District has published screening thresholds to determine whether proposed projects will have significant impacts to air quality. (https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en) Under the official BAAQMD thresholds, construction of 416 apartments is expected to have significant air quality impacts from the construction phase, and 638 apartments are expected to have significant operational air quality impacts. The addition of 4,000 residential units will vastly exceed these significance thresholds, and will therefore have a significant impacts on air quality that must be analyzed under CEQA. (SWAPE at 4).

SWAPE calculates that the additional 4,000 units of housing will create emissions of Reactive Organic Gases (ROGs) of 148 pounds per day (ppd) for the construction phase (far above the CEQA significance threshold of 54 ppd) and 145 ppd of operation ROG emissions (far above the CEQA significance threshold of 54 ppd). (SWAPE at 5). SWAPE concludes, "This finding indicates a potentially significant air quality impact that the Addendum did not identify or address. In our opinion, a subsequent EIR should be conducted to provide a more substantial calculation of the Project's emissions and a more detailed evaluation of the Project's potential air quality impacts." (SWAPE at 5).

When a project exceeds an Air District CEQA significance threshold, as here, this alone establishes substantial evidence that the project will have a significant adverse environmental impact. Indeed, in many instances, such air quality thresholds are the only criteria reviewed and treated as dispositive in evaluating the significance of a project's air quality impacts. (See, e.g. *Schenck v. County of Sonoma* (2011) 198 Cal.App.4th 949, 960 [County applies Air District's "published CEQA quantitative criteria" and "threshold level of cumulative significance"]; see also *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 110-11 ["A 'threshold of significance' for a given environmental effect is simply that level at which the lead agency finds the effects of the project to be significant"].) The California Supreme Court has shown the importance an air district significance threshold has in providing substantial

evidence of a significant adverse impact. (*Communities for a Better Environment v. South Coast Air Quality Management Dist*. (2010) 48 Cal.4th 310, 327 [estimated emissions in excess of air district's significance thresholds "constitute substantial evidence supporting a fair argument for a significant adverse impact"].)

Also, in 2025 city released a new APEZ (air pollutant exposure zone) map showing areas with high cancer risk. The Rezone allows development in some of these newly identified areas. This is a significant new information and a changed circumstance that was not known at the time of the 2022 EIR. (Addendum 95). The new APEZ areas include Sunset Blvd, and Lake Merced. These areas will receive significant development under the Rezone. This impact must be analyzed. (Addendum 96). The Addendum admits that the cancer risks created by the Rezone in the new APEZ areas are significant and unmitigated. (Addendum 97). The Northeast District is within the APEZ area. By moving over 5000 units of new housing to this area, the Rezone exacerbates cancer risks from airborne pollutants.

A supplemental EIR is required because "significant effects previously examined will be substantially more severe than shown in the previous EIR." (CEQA Guidelines section 15162(a)(3)(B).) Also, the new APEZ map constitutes, "new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete." (CEQA Guidelines section 15162(a)(3).)

SWAPE states,

> The Addendum proposes development in the Downtown, Marina, Mission, Northeast, and Western Addition planning districts, which have areas within the City's air pollutant exposure zones ("APEZ"). The Addendum states that "the proposed rezoning program may result in a small proportion of additional rezoned parcels being in the APEZ, which could increase the number of people exposed to the generally high pollutant concentrations in the APEZ" (p. 97).
>
> In 2025, the City identified new APEZ areas, defined as locations "where particulate matter (PM2.5) is greater than or equal to 9 µg/m3 or where the risk of cancer from air pollutants is greater than or equal to 100 in a million." (SWAPE at 5).

The Addendum concludes that this impact is "significant and unavoidable." (Addendum 97). SWAPE disagrees with this conclusion and proposes numerous feasible mitigation measures to reduce air pollution impacts that should be analyzed in a supplemental EIR. (SWAPE at 7-9). Among the mitigation measures suggested by SWAPE are requiring the use of ultra-low VOC paints, advanced air filtration units, emissions controls on backup generators, and many other measures. These mitigation measures should all be analyzed and imposed through a supplemental EIR process.

**E. TRANSIT DELAY.**

The Addendum admits that the Rezone will create significant impacts related to public transit delay, particularly along the busy 19th Avenue corridor, and on the 38-Geary and 19-Polk lines. (Addendum 71, 78, 84). The Addendum concludes that Rezone would contribute considerably to significant and unavoidable bus loading impacts. (Addendum 84). These impacts, particularly along the 19th Avenue corridor, will be exacerbated by the recent closure of the Great Highway, which has caused congestion on 19th Avenue by closing a major thoroughfare in the Western side of the City. The closure of the Great Highway is a changed circumstance that was unknown at the time of the 2022 EIR.

A supplemental EIR is required because "substantial changes [have] occur[ed] with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." (CEQA Guidelines §15162(a)(2).) The closure of the Great Highway is clearly a significant changed circumstance that was not analyzed in the 2022 EIR and that will impact the Transportation analysis for the Rezone.

**F. PUBLIC SERVICES.**

The Rezone will allow residential development on the site of the North Point Wet Weather Sewage Treatment Facility. This site was not slated for development in the 2022 Plan. This amendment will require either a replacement facility or vast amounts of infrastructure to transport sewage to other plants. The sewage currently treated by the North Point Plant must go somewhere. Urban Planner Deborah Holley states, "This City-owned and -operated sewage treatment plant is one of three facilities in San Francisco that treats wastewater. It is only active during wet weather and treats up to 150 million gallons a day (MGD) during rainstorms, or 26 percent of the wastewater treated on a rainy day." She continues, "The FEIR did not address the impacts of redevelopment of this treatment plant with housing because this site was not designated for rezoning. The rezoning program changes the allowable height limit on this site from 40' to 85' and increases the likelihood that it would be redeveloped with housing. The site is in the P (Public) District where residential uses in 100 percent Affordable Housing Projects and Educator Housing Projects are permitted, and other residential uses are conditional. There is no reason the City would include this site in the rezoning program other than the fact that the City believes rezoning this site will increase the likelihood of housing development at this location. Since it is inconceivable that a developer would build housing on top of a sewage treatment plant, the City needs to analyze the impacts associated with elimination of the sewage treatment plant." Ms. Holley states:

> Elimination of the sewage treatment plant would result in reduced sewage treatment capacity during wet weather. This would require (a) the construction of a new sewage treatment facility in this area of the city, or (b) the construction of new infrastructure to convey wastewater from the northeast quadrant of the city to the Oceanside Treatment Plant or the Southeast Treatment Plant in Bayview/Hunters

Point and expansion of one of these facilities to expand the treatment capacity by 150 MGD to compensate for the loss of the North Point facility.

The potential public health and hazardous materials impacts of redeveloping the site with housing must be identified and analyzed and mitigation measures must be identified in a supplemental EIR. This includes but would not be limited to testing and classification of contaminants, calculations of health risk, specific remediation measures, associated secondary impacts due to the excavation of contaminated soil, transportation and disposal of infrastructure, and treatment and disposal of contaminated water and soil.

CEQA does not allow the City to defer analysis of obvious sewage treatment needs. When a project will require construction of additional sewage treatment infrastructure, the CEQA document must analyze and mitigate the impacts of that necessary new construction. (*Sundstrom v. Cnty. of Mendocino* (1988) 202 Cal. App. 3d 296; *San Joaquin Raptor/Wildlife Rescue Ctr. v. Cnty. of Stanislaus* (1994) 27 Cal. App. 4th 713 (EIR was also inadequate with respect to project description by its lack of reference to wastewater treatment plant which was necessary element of project).)

## V. GENERAL PLAN ANALYSIS.

The Rezone is legally prohibited because it is inconsistent with the General Plan. "The Legislature has mandated that every county and city must adopt a 'comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning.'" (*Citizens of Goleta Valley v. Bd. of Sups*. (1990) 52 Cal.3d 553, 570 (quoting Gov. Code §65300).) The Supreme Court has described the general plan as "the constitution for all future developments within the city or county." *Id*. (internal quotation marks omitted). The "propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." (*Id. DeVita v. Cty. of Napa*, 9 Cal. 4th 763, 803 (1995).) The "propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." (*Citizens of Goleta Valley v. Bd. of Sups.* (1990) 52 C.3d 553, 570.)

The Rezone is flatly inconsistent with the adopted General Plan, and its adopted Housing Element. The Rezone allows development in historic districts, such as North Beach and Telegraph Hill, which were protected from development in the General Plan. The Rezone allows development in Priority Equity Geographies that were protected from development in the General Plan. The Rezone allows building heights and density throughout the City that vastly exceed limits set forth in the General Plan. As such, the Rezone is legally prohibited unless and until the City amends its General Plan.

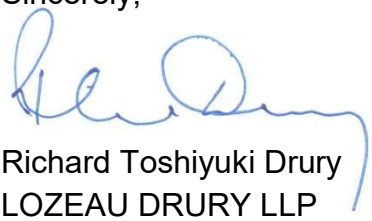
In addition, each of these General Plan inconsistencies is a significant impact that must be analyzed in an EIR. Any inconsistencies between a proposed project and applicable plans must be discussed in an EIR. (14 CCR § 15125(d); *City of Long Beach v. Los Angeles Unif. School Dist*. (2009) 176 Cal. App. 4th 889, 918; *Friends of the Eel*

*River v. Sonoma County Water Agency* (2003) 108 Cal. App. 4th 859, 874 (EIR inadequate when Lead Agency failed to identify relationship of project to relevant local plans).) A Project's inconsistencies with local plans and policies constitute significant impacts under CEQA. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4.)

## VI. CONCLUSION.

For the foregoing reasons, we respectfully request that the Planning Commission direct the Planning Staff to prepare a Supplement EIR to analyze the Rezone and to consider feasible mitigation measures and alternatives to reduce its significant environmental impacts that were not analyzed in the 2022 EIR for the Housing Element. We further request that the Planning Commission conclude that the Rezone is prohibited since it is inconsistent with the City's General Plan.

Sincerely,



Richard Toshiyuki Drury
LOZEAU DRURY LLP

# EXHIBIT A

December 1, 2025

Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA  94612

**RE: Adequacy of the San Francisco Housing Element 2022 Update FEIR Addendum**

Dear Mr. Drury,

The San Francisco Planning Department published an Addendum to the Final Environmental Impact Report for the 2022 Housing Element ("Housing Element FEIR") on September 3, 2025, stating that no supplemental or subsequent environmental review was required for the Family Housing Rezoning Program ("proposed rezoning program, Family Zoning Plan, FZP, rezoning plan").

Because there are potential new or more severe environmental impacts that would result from the proposed rezoning program that were not identified and analyzed in the Housing Element FEIR, a supplemental EIR should have been prepared instead of an Addendum.

Such impacts include, but are not limited to the following:

A. The rezoning plan would result in new impacts associated with the potential redevelopment of the North Point Wet Weather Sewage Treatment Facility which was not included and therefore not analyzed in the Housing Element FEIR but which, as a result of the rezoning plan, is now designated as a site for the development of housing.

B. The rezoning plan would result in more severe displacement impacts, particularly those associated with the addition of numerous parcels within the Priority Equity Geographies SUD that were added to the rezoning plan but not included, and therefore not analyzed, in the Housing Element FEIR.

My qualifications for preparing this analysis include over 25 years of professional experience in land use and environmental planning, including the management and preparation of CEQA documents, and a Master of Science degree in Urban Planning

from Columbia University. My resume can be accessed via this link: https://www.holleyconsulting.com/resume/.

The Addendum to the Housing Element FEIR maintains that no supplemental or subsequent environmental review is required for the proposed rezoning program because the environmental impacts were adequately identified and analyzed in the Housing Element FEIR, and the rezoning program "…would not result in any new or more severe environmental impacts than were identified previously."

Specifically, the Addendum states that "…no additional environmental review is required under CEQA Section 21166 and CEQA Guideline Sections 15162-15164 for the following reasons:

(1) the Family Housing Rezoning Program would not involve new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Housing Element EIR;
(2) no substantial changes have occurred that would require major revisions to the Final EIR due to the involvement of new environmental effects or a substantial increase in the severity of effects identified in the Housing Element EIR; and
(3) no new information of substantial importance has become available which would indicate that (i) the Family Housing Rezoning Program will have significant effects not discussed in the Final EIR; (ii) significant environmental effects will be substantially more severe; (iii) mitigation measure or alternatives found not feasible that would reduce one or more significant effects have become feasible, or (iv) mitigation measures or alternatives that are considerably different from those in the Housing Element EIR would substantially reduce one or more significant effects on the environment."

**2022 FEIR compared to Proposed Rezoning**

***Baseline Map***. In order to understand what was analyzed in the 2022 FEIR, and what was added in subsequent policy changes, I reconstructed "Figure 2-7 Projected Heights and Density Controls Under the Proposed Action" from page 2-25 of Vol. 1 of the FEIR. ***Figure 1***, below, provides the most detailed description of the parcel-level impacts of the proposed rezoning for parcels analyzed in the 2022 Final EIR.

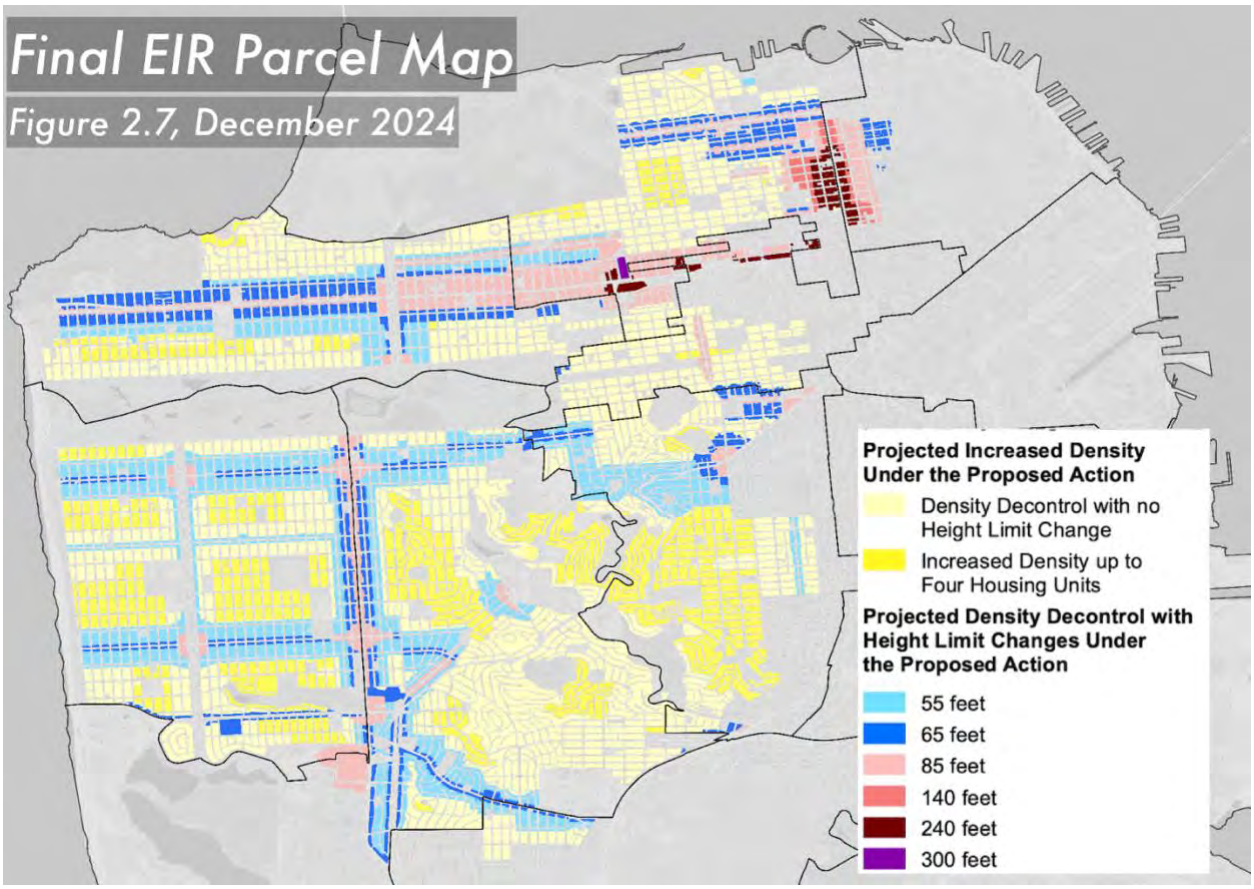



**Figure 1. Baseline Map: 2022 FER Map Compared to the September 2025 Map, plus removing 3-unit+ Rent-Controlled Buildings and Hotels**

The September 2025 map, based on the rezoning legislation introduced in board file 250700, was the most recent parcel-level map released by the Planning Department. The most significant amendments passed include exempting rent-controlled buildings of three units or larger from the local program, and exempting hotel parcels. *Planning recently released a November 17th map but it is not accurate as it does not yet exclude three-units+ rent controlled buildings.*

***Figure 2*** below shows that 6,938 new parcels were added in the proposed rezoning plan, 7,580 parcels have increased heights, and 16,135 parcels allow for greater densities. Associated unit counts were also estimated and are provided in the table following Figure 2.

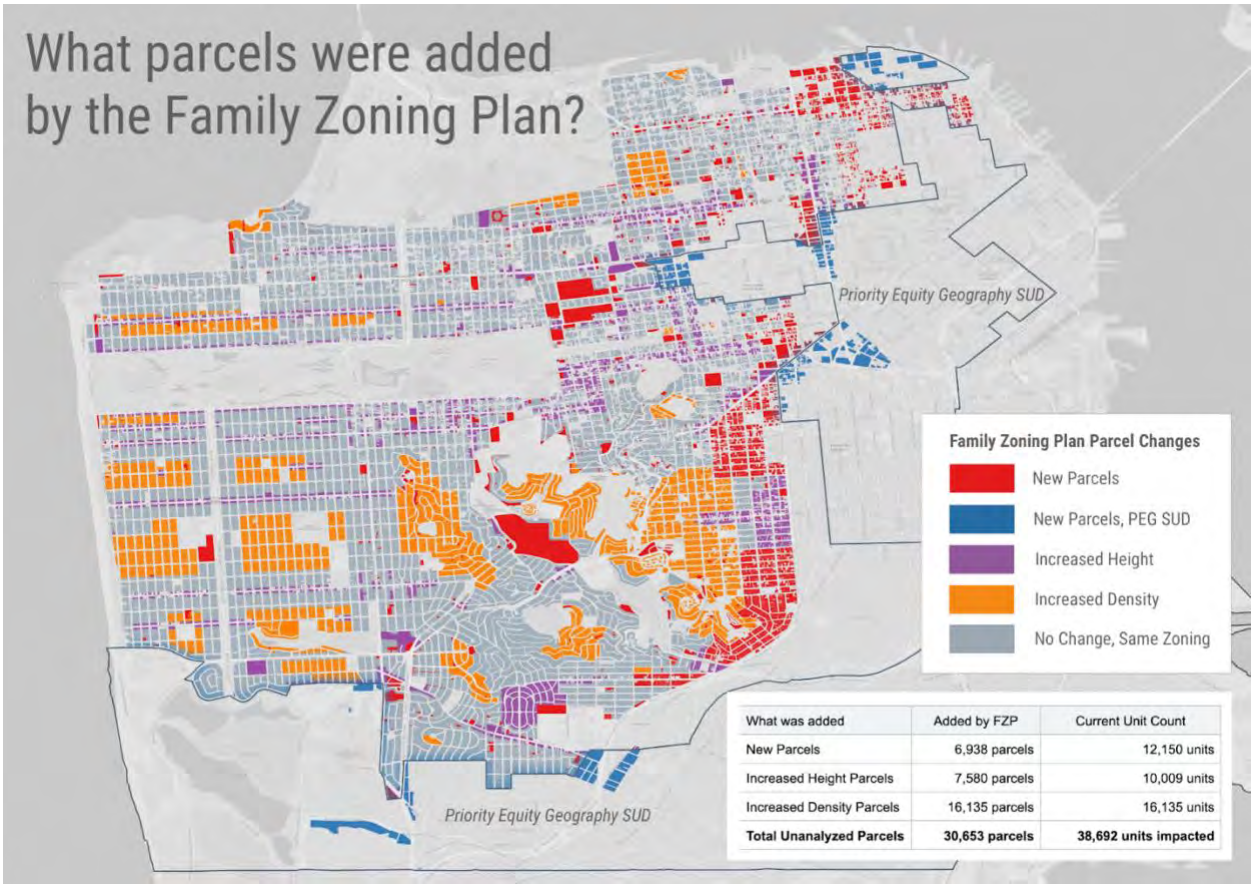



**Figure 2. Parcels added and parcels with increased heights and densities under the rezoning**

### 1. What was added to the Family Zoning Plan from the FEIR?

| What was added | Added by FZP | Current Unit Count |
|---|---|---|
| New Parcels | 6,938 parcels | 12,150 units |
| Increased Height Parcels | 7,580 parcels | 10,009 units |
| Increased Density Parcels | 16,135 parcels | 16,135 units |
| **Total Unanalyzed Parcels** | **30,653 parcels** | **38,692 units impacted** |

**2) Scope of Family Zoning Plan vs. 2022 Final EIR**

| Total Count | Final EIR - 2022 | Family Zoning Plan - 2025 |
|---|---|---|
| Parcel Count | 82,834 | 79,932 |
| Current Units Count* | 150,031 | 94,281 |
| Area Added (sq ft) | 257,461,954 | 254,211,574 |

** Residential and non-residential "units" (commercial spaces) impacted*

**3. Existing Parcels with increased height limits**

**a.** **7,580 parcels** with increased height limits
**b.** **10,009 currently existing units** in parcels with increased height limits
**c.** **31,424,690 sq ft** of total lot area in parcels with increased height limits

| Height Limit Increase | Parcels | Current Unit Count |
|---|---|---|
| 100' + | 73 | 201 |
| 60' - 100' | 34 | 31 |
| 40' - 60' | 667 | 823 |
| 20' - 40' | 3,244 | 4,906 |
| < 20' | 3,562 | 4,048 |

The following discussion describes potential impacts that were not analyzed in the CEQA document for the rezoning project. The Addendum is inadequate under CEQA and a supplemental EIR must be prepared to identify and analyze the potentially new and more severe impacts described below.

**A. Rezoning of the North Point Wet Weather Sewage Treatment Facility**

There are new potentially significant impacts associated with the proposed rezoning plan that were not identified and assessed in the Housing Element EIR or Addendum including impacts associated with development of the North Point Wet Weather Facility located at Bay Street and the Embarcadero. This City-owned and -operated sewage treatment plant is one of three facilities in San Francisco that treats wastewater. It is only active during wet weather and treats up to 150 million gallons a day (MGD) during rainstorms, or 26 percent of the wastewater treated on a rainy day.

The 2022 FEIR did not address the impacts of redevelopment of this treatment plant with housing because this site was not designated for rezoning at that time. The rezoning program changes the allowable height limit on this site from 40' to 85' and increases the likelihood that it would be redeveloped with housing. The site is in the P (Public) District where residential uses in 100 percent Affordable Housing Projects and Educator Housing Projects are permitted, and other residential uses are conditional.

There is no reason the City would include this site in the rezoning program other than the fact that the City believes rezoning this site will increase the likelihood of housing development at this location. Since it is inconceivable that a developer would build housing on top of a sewage treatment plant, the City needs to analyze the impacts associated with elimination of the sewage treatment plant.

Moreover, although the Addendum states that "It is likely that the Oceanside Water Pollution Control Plant would experience reduced pollutant loads under the proposed rezoning program compared to the adopted housing element because housing growth distribution under the proposed rezoning program would be more evenly distributed in the western and northern parts of the city and along transit corridors, instead of heavily concentrated in the Inner Sunset, Outer Sunset, and Richmond planning districts as assumed under the adopted housing element; thus pollutant load generation, would be more evenly distributed throughout the city rather than concentrated in the western portion of the city," there is no mention at all of the North Point treatment plant. (See pages 127-128 of the Addendum.)

Potentially significant impacts that should have been identified and analyzed in a supplemental EIR include, but are not limited to the following:

1. Elimination of the sewage treatment plant would result in reduced sewage treatment capacity during wet weather. This would require (a) the construction of a new sewage treatment facility in this area of the city, or (b) the construction of new infrastructure to convey wastewater from the northeast quadrant of the city to the Oceanside Treatment Plant or the Southeast Treatment Plant in Bayview/Hunters Point and expansion of one of these facilities to expand the treatment capacity by 150 MGD to compensate for the loss of the North Point facility.

2. The potential public health and hazardous materials impacts of redeveloping the site with housing must be identified and analyzed and mitigation measures must be identified in a supplemental EIR. This includes but would not be limited to

testing and classification of contaminants, calculations of health risk, specific remediation measures, associated secondary impacts due to the excavation of contaminated soil, transportation and disposal of infrastructure, and treatment and disposal of contaminated water and soil.

## B. More severe displacement Impacts would result from the proposed rezoning program than were assumed in the Housing Element FEIR

Potentially significant displacement impacts that should have been identified and analyzed in a supplemental EIR include, but are not limited to the following:

1. ***Rezoning and displacement of tenants in two-unit rent-controlled buildings***. As shown below, under the proposed rezoning, there are a significant number of two-unit rent-controlled buildings on parcels with an existing height limit of 40 feet that would be rezoned to allow heights of 50', 65' and 85', and would no longer require setbacks, creating greater incentives and likelihood that they would be redeveloped under the proposed rezoning. In other words, it is reasonably foreseeable that they would be redeveloped and therefore should have been considered in the CEQA review for the project.

**Rent Controlled Parcels**

| What was added | Parcels affected | Existing units affected |
|---|---|---|
| New Parcels | 1,237 parcels | 2,474 units |
| Increased Height Parcels | 1,818 parcels | 3,636 units |
| Increased Density Parcels | 783 parcels | 1,566 units |
| Total Rent Controlled Parcels | 3,838 parcels | 7,676 units |

It is widely accepted that tenants of two-unit rent-controlled buildings already have fewer protections than tenants who live in buildings with three or more units because a two-unit building can more easily be converted into condos. In two-unit buildings, all an owner needs to do is move in, and they can evict a tenant to do so.

The inclusion of parcels with two-unit rent controlled buildings in the rezoning plan and the associated displacement impacts need to be identified and assessed in a supplemental EIR.

2. ***Rezoning and displacement in the Priority Equity Geographies Special Use District.*** Section 249.97 (b) of the San Francisco Planning Code states that "The Priority Equity Geographies SUD is comprised of areas or neighborhoods with a higher density of vulnerable populations" and that the 2022 Update of the Housing Element of the General Plan ((2022 Housing Element) identifies them as "***areas***…***where zoning changes must be tailored to serve the specific needs of the communities that live there; and where programs that stabilize communities and meet community needs need to be prioritized***."

   As shown in ***Figure 2*** above and quantified below, close to 1,000 parcels in the proposed rezoning program that were not analyzed in the Housing Element FEIR are located within the PEG SUD. Displacement impacts for residents in these areas are more severe than for residents outside of the SUD.

   **New Priority Equity Geography Parcels**
   a. 939 parcels
   b. 2,321 current existing units (including RC and non-RC)
   c. 70 two-unit RC buildings, 140 units

   The inclusion of parcels in the Priority Equity Geographies SUD and the associated displacement impacts need to be identified and assessed in a supplemental EIR.

3. ***Rezoning and displacement of Laguna Hospital and Rehabilitation Center occupants***. As shown in ***Figure, 2*** above, the 62-acre Laguna Honda hospital and rehabilitation center located 375 Laguna Honda Boulevard was added to the rezoning plan, and if redeveloped would result in significant displacement impacts for the long-term nursing home residents.

   Laguna Honda has 769 beds and offers short-term rehab and long-term nursing care. in the Forest Hill neighborhood of San Francisco.

   The FEIR did not address the impacts of redevelopment of Laguna Honda with housing because this site was not designated for rezoning. The rezoning program changes the allowable height limit on this site from 40' which covers the majority of the 62 acres under existing height limits, to 85' for the entire site, and increases the likelihood that it would be redeveloped with housing. The site is in the P (Public) District where residential uses in 100 percent Affordable Housing Projects and Educator Housing Projects are permitted, and other residential uses are conditional.

There is no reason the City would include this site in the rezoning program other than the fact that the City believes rezoning this site will increase the likelihood of housing development there.

Because the impacts of redevelopment of Laguna Honda Hospital and Rehabilitation Center was not analyzed in the Housing Element FEIR, a supplemental EIR is needed to determine the impacts and required mitigation measures.

# EXHIBIT B

November 30, 2025

Mr. Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

RE: Family Zoning Plan (Rezone) – Impacts on Historic Resources

Dear Mr. Drury,

This letter sets forth my professional opinion concerning the impacts on historic resources from the proposed San Francisco Rezoning Plan ("Rezone"), also known as the "Family Zoning Plan."

As a professional with 32 years of experience in historic preservation and with the California Environmental Quality Act (CEQA), I meet the Secretary of the Interior's Professional Qualification Standards in History and Architectural History. I also have the following credentials: received a Master of Arts Degree in Architectural History from the University of Virginia's School of Architecture; previously served as president of the San Francisco Landmarks Advisory Board (appointed by Mayor Newsom); since 2012 have continuously been on the City of San Francisco Planning Department's approved consultant pool for historic resources consultants; and certified by the San Francsico Contract Monitoring Division (CMD) as a woman-owned Local Business Enterprise (LBE). I have written innumerable historic resource and historic district designation and evaluation reports throughout the course of my career.

While the City of San Francisco (City) prepared and certified an Environmental Impact Report (EIR) for its 2022 Housing Element, the proposed Rezone is vastly different from the rezoning scenarios studied in the 2022 EIR. Nevertheless, the Planning Department proposes to rely on an Addendum (September 3, 2022) to the previously certified EIR. A rezoning of this magnitude requires thorough environmental review under CEQA so that the City's residents and decision-makers can be aware of its impacts, can consider all feasible mitigation measures and alternatives, and can have a robust and open discussion prior to making irreversible changes to San Francisco's landscape for all time.

The Rezone would result in a myriad of significant new impacts that were not analyzed in the 2022 EIR or included in the Housing Element, not the least of which are impacts to historic resources. The Rezone would result in significant impacts to historic resources that have not yet been analyzed. The 2022 EIR found significant and unmitigated impacts to historic resources, but the Rezone's impacts are far greater and substantially more severe than shown in the previous EIR, with significant and unmitigated impacts. Since "significant effects previously examined will be substantially more severe than shown in the previous EIR," a Supplemental EIR is required. (CEQA Guidelines 15162(a)(1)(3)(B).)

As set forth in the Attachments to this letter, the Rezone would allow the demolition and redevelopment on, near, or within areas containing historic resources. Many known and designated, either locally under Article 10 of the Planning Code, or through state or federal historic designation programs, are within areas that were not included for rezoning in the 2022 Housing Element or analyzed in the 2022 EIR, while others were included in the analysis, but have since been upzoned or changed to form based density or have significantly higher heights on or around them by the Upzone. None of the potentially significant impacts that could result from redevelopment of these historic resources were analyzed in the 2022 EIR. See the following attachments for further analysis: Attachment 1 - Historic Resource Impact Analysis of Rezone and Attachment 2 - North Beach National Register of Historic Places Historic District Parcel Analysis.

Since this new information provided in the Attachments constitute significant and substantially more severe effects not discussed in the 2022 EIR, a Supplemental EIR is required to analyze and mitigate these impacts. The newly identified impacts are beyond the scope of the 2022 EIR. The Addendum barely mentions additional historic resources impacts and fails to analyze impacts of the drastically additional height and density increases as they relate to known historic resources. Further, the Addendum fails to analyze changes in zoning use districts on designated historic resources or historic districts or areas with known concentrations of "A" rated historic resources, which are identified, but not yet designated resources.

Further, the Rezone now includes the following language related to Bonuses for "Historic Preservation." However, these bonuses, as shown below, encourage height increases, facadism, and other over-scaled additions that would result in diminished historic fabric and result in unintended impacts to historic resources. Additionally, this proposed legislation, added in the September 11, 2025 version of the legislation, has not been evaluated for its potentially significant impacts on historic resources.

The following language has been added to Section 206.10(e) of the Rezone legislation providing additional height and square footage bonuses for the "preservation" of Historic Building.

> *(e)* ***Additional Height, Square Footage, and Other Bonuses.*** *HC-SF Projects that contain certain uses, amenities, or other building features are eligible for additional bonuses and code modifications, as described below.*
>
> *********

(6) ***Preservation of Historic Buildings.*** *In districts other than Residential districts, projects proposing an alteration to a Historic Building and/or constructing new buildings on sites that contain a Historic Building shall be permitted to include additional square footage, as provided below:*

*(A) up to 1.5 times the gross floor area foregone by retaining the Historic Building and complying with Objective Standards pertaining to Historic Buildings, including through setting back building additions and/or new construction in relation to the Historic Building. For the purposes of this subsection (e)(56)(A), the foregone gross floor area shall be equal to the gross floor area within the volume that would otherwise be permitted under the Planning Code and all applicable Objective Standards, inclusive of modifications allowed pursuant to this Section 206.10, but is not being constructed in order to accommodate a reduced building mass above or around a Historic Building and that complies with or exceeds the setbacks or mass reductions required by the Objective Standards pertaining to Historic Buildings. The Zoning Administrator may publish further guidance on the calculation of foregone gross floor area; and*

*(B)* for Historic Buildings with storefronts that contain character-defining features, an additional 0.25 square feet for every square foot of space in the storefront, provided that the project preserves the storefront in compliance with Objective Standards pertaining to Historic Buildings; and

(C) *horizontal or vertical additions to accommodate this extra square footage, except that any such additions shall not:*

*(i) exceed 20 feet above the Housing Choice-SF height limit (Section 263.19); or*

*(ii) reduce the required rear yard above the ground floor to less than 15 feet where the site abuts the rear yard of adjacent parcels containing residential uses.*

(D*) The Historic Building* and/or historic storefront *shall be maintained in compliance with the Preservation Design Standards for the life of the project, and the requirement shall be recorded in a Notice of Special Restrictions.*

This late addition of the above language to the legislation has the great potential to cause impacts to historic resources, instead of preserving them, as it would allow large sections of historic buildings to be demolished and over scaled additions and height increases to be implemented as bonuses.

For the reasons listed above, and as set forth in the Attachments, it is my professional opinion that the Rezone, if approved, would have additional and substantially more severe impacts to historic resources than were analyzed in the certified EIR. These potentially significant environmental impacts must be analyzed and mitigated under the California Environmental Quality Act ("CEQA") through a full recirculated Supplemental EIR.

Sincerely,



Bridget Maley
Principal

Attachment 1: Historic Resource Impact Analysis of Rezone
Attachment 2: North Beach National Register of Historic Places Historic District Parcel Analysis

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**Attachment 1: Historic Resource Impact Analysis of Family Zoning Plan (Rezone)**
**November 30, 2025**
**Compiled by Bridget Maley, architecture + history, llc**

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The Family Zoning Plan (Rezone) would result in significant new impacts on historic resources that were not included in the 2022 Housing Element or analyzed in its associated Environmental Impact Report (2022 EIR). The area of the Rezone is significantly larger than the area included in the 2022 Housing Element and analyzed in the 2022 EIR.

It should be noted that all projects using the Rezone would be subject to form-based density (i.e. density decontrol) regardless of height limit or underlying zoning district. These height and density changes would encourage demolition of smaller-scale historic resources throughout the Rezone area.

In addition, for many parcels within the Rezone area, increases to the existing base height limits and/or changes from density limited to form based density (i.e. density decontrol) would be allowed for projects NOT using the Rezone, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses.

The Housing Element EIR Addendum No. 1 (September 3, 2025) fails to analyze impacts of additional height and density increases described above, as well as changes in zoning use districts, on designated historic resources and historic districts or on areas with known concentrations of “A” rated historic resources, but not yet designated as historic districts, including, but not limited to those resources listed below.

The list below includes landmarks and contributors to historic districts designated pursuant to Article 10 of the San Francisco Planning Code that may be removed from the Upzone by a pending amendment to the Upzone legislation.

**Historic Resources Not Evaluated in 2022 Housing Element EIR**

The following districts and individual historic resources were not included in the 2022 Housing Element or analyzed in the 2022 EIR, but are now included in the Rezone as of November 2025.

- Fully documented North Beach National Register Historic District submitted to the State Historic Preservation Office and awaiting hearing by the State Historical Resource Commission was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone could have significant impacts to this identified historic district, including heights rezoned from 40 feet to 50 feet in block Block 0076. (See Attachment 2: List of Historic Resources in North Beach Historic District in Rezone.)

- Designated Northeast Waterfront Article 10 Historic District. Sansome Street Area Revision contained in “Appendix D: Memorandum Regarding Potential Zoning Map Changes in Supervisor District 3” disclosed the intent to include in the Rezone Plan areas within this Historic District centered along Sansome Street include the following seventeen parcels: Block 0085/Lots 005 and 048; Block 0106/Lots 001, 002, 003, 004, and 042; Block 0112/Lots 008 and 009; Block 0113/Lots 006, 041, 040, and 063; Block 0134/Lot 001; and Block 0135/Lots 007, 008, and 009. This area was not included in the

2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Eligible Washington Square Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone now includes six parcels on Filbert Street between Powell Street and Stockton Street, including the Church of Saints Peter and Paul and the Priests' Residence, which could result in significant impacts to this Historic District.

- Eligible Upper Grant Avenue Historic District, an eligible California Register Historic District. This area was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone now includes seven contributory buildings in this District along Filbert Street, Medau Place, and Grant Avenue (Blk 0088/Lots 5, 41-57, and 9), which could result in significant impacts to this Historic District.

- Designated Otis Elevator Company National Register No. 99001265 (1 Beach Street; Parcel 0018/001). This parcel is rezoned from its existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Grabhorn Press Building National Register No. 97000349 (1335 Sutter Street; Parcel 0690/012A). This parcel was rezoned from its existing height limit of 130 feet to to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses.This drastic upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Thomas Payne House National Register No. 80000847 (1409 Sutter Street; Parcel 0689/025). This parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses. This drastic upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Myrtle Street Flats Building, both National Register No. 76000520 and Article 10 Landmark No. 71 (234-248 Myrtle Street; Parcel 0714/020), sometimes referred to as part of the Goodman Building. This parcel is rezoned from its existing height limit of 130 feet to 650 feet. The Rezone also increases the base height limit from 130 feet to 260 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or other State programs that provide density or development bonuses.This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Washington Square Article 10 Landmark No. 226 (1651 Stockton Street and Filbert Street; 0102/022001). The parcels on the northern edge of Washington Square are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this park.

- Designated Article 10 "Structure of Merit" The Cannery (600 Beach Street; Parcel 0010/001). This parcel is rezoned from its existing height limit of 40 feet to 65 feet. As the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this site.

- Designated Building at 1840-1842 Eddy Street National Register No. 73000437 (1840-1842 Eddy Street, Parcel 1127/015). This parcel is rezoned from its existing height limit of 65 feet to 85 feet and changed to form-based density (density decontrol). This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Building at 45-57 Beideman Place National Register No. 73000436 (45-57 Beideman Place, Parcel 1100/118). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Building at 33-35 Beideman Place National Register No. 73000435 (33-35 Beideman Place, Parcel 1100/095). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1331-1335 Scott Street National Register No. 73000440 (1331-35 Scott Street, Parcel 1100/120). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1321 Scott Street National Register No. 7300439 (1321 Scott Street, Parcel 1100/049). This parcel is included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1249-1251 Scott Street National Register No. 73000442 (1249-51 Scott Street, Parcel 1127/035). This parcel now included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 1239-1245 Scott Street National Register No. 7300441 (1239-45 Scott Street, Parcel 1127/043). This parcel now included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-1 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Temple Sherith Israel National Register #10000114 (2266 California St., Parcel 0637/011). Now included in the Rezone, this parcel is being upzoned from its existing 40 feet to 85 feet with a new base height of 50 feet. It is also changed to form based density and rezoned to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Dallam-Merritt House National Register #84001185 (2355 Washington Street, Parcel 0613/021). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated site of Third Baptist Church California Registered Historical Landmark No. 1010 (483 Greenwich Street, Parcel 0087047). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Fillmore-Pine Building National Landmark No. 82002247 (1940-1946 Fillmore Street, Parcel 0660/023). Now in the Rezone, this parcel is being rezoned from its existing height limit of 40 feet to 65 feet. This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Park View Hotel National Register No. 83001235 (750 Stanyan Street, Parcel 1250/025). Now in the Rezone, this parcel is being rezoned from its existing height limit of 50 feet to 65 feet. This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Delane House National Register No. 82000984 (70 Buena Vista Terrace, Parcel 2608/013). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated House at 584 Page Street National Register No. 85002195 (584 Page Street, Parcel 0842/017). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Moss Beach House National Register No. 83001232 (1626 Great Highway, Parcel 1895/038). Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Real Estate Associates (TREA) Houses National Register No. 85000705 (2503, 2524, 2530 and 2536 Clay Street (Parcel 0630/032, 0611/008, 0611/009 and 0611/010). Now in the Rezone, the house at 2503 Clay is upzoned from 40 feet to 65 feet. These 4 historic houses were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Wilford Houses National Register No.85001914 (2121 & 2127 Vallejo Street, Parcels 0565/021and 0565/022). Now in the Rezone, these parcels adjoin parcels upzoned to 65 feet. These 2 historic houses were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Sinton House National Register No. 11000944(1020 Francisco Street, Parcel 0476002C).Now in the Rezone, this parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Russian Hill Paris Block Architectural Historic District National Register of Historic Places Historic District No. 87002288. The Rezone includes four parcels in this District between Green Street and Macondray Lane (Block 0121/Lots 005, 006, 049, and 056), which were not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this Historic District.

- Designated Russian Hill Macondray Lane National Register Historic District No. 87002286. The Rezone includes this entire Historic District, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this Historic District, especially corner parcels that could be up to 65 feet in height in this residential district.

- Designated Port of San Francisco Embarcadero National Register Historic District No. 06000372. The Rezone includes increased height and density along the Embarcadero, especially on Bay, North Point, Beach and Jefferson Streets, which could impact this Historic District. These heights, not included in the 2022 Housing Element or analyzed in the 2022 EIR, could result in significant impacts to this Historic District.

- Designated Golden Gate Park National Register Historic District No. 04001137. The Rezone includes height increases along Fulton Street and Lincoln Boulevard bordering the north and south sides of Golden Gate Park and Stanyon Street bordering the east side. The heights along Fulton Street are increased from 40 feet to 85 feet and along

Lincoln from 40 feet to 65 feet, both streets are changed to form-based density (density decontrol) and rezoned to RTO-C that allows commercial uses on the ground floors. Heights along a portion of Stanyan Street are rezoned from 50 feet to 65 feet. Heights are also increased in places along Fell and Oak Streets in the Panhandle of the Park. These proposed height, density, and use changes in the Rezone were not included in the 2022 Housing Element or analyzed in the 2022 EIR and would have significant impacts on this designated historic district.

- Designated Presidio of San Francisco National Historic Landmark Historic District No. 66000232. Development proposed in the Rezone adjacent to the Presidio of San Francisco at 300 Lake Street; Parcel No. 1354/001, upzoned from 40 feet to 65 and from 65 feet to 85 feet. Also upzoned at the Lombard Gate from 40 feet to 65 feet. Additionally, development in the residential zoned areas of Presidio Terrace and Sea Cliff heights would be allowed to 65 feet on 8,000 square foot parcels. These Rezone heights were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Lower Nob Hill Apartment Hotel National Register Historic District No. 91000957. Height increases along the edges would impact this designated Historic District. The increased heights at Bush and Leavenworth Streets from the existing height limit of 65 feet to 120 feet and Polk Street between Geary and Sutter Streets from the existing height limit of 80 feet to 240 feet. These heights were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could impact this Historic District.

- Designated Veterans Affairs Medical Center National Register Historic District No. 05001112 (4150 Clement Street). Along the southern edge of this District the Rezone includes increases from the existing height limit of 40 feet to 65 feet on Clement Street. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could impact this Historic District.

- Designated Cable Car National Register Historic District No. 66000233. The Cable Car lines located within areas being upzoned and/or density decontrolled by the Upzone Plan could be significantly impacted. These include, without limitation, those lines along the following routes: Hyde between Beach and Washington, Washington between Hyde and Mason, Jackson between Leavenworth and Hyde, California between Van Ness and Mason, Mason between Green and Columbus, Columbus between Mason and Taylor, and Taylor between Chestnut and Francisco. Height increases adjacent to these streets could impact these linear transit historic resources, and construction activities resulting from development incentivized by the Upzone could cause extensive service interruptions. Impacts to the Cable Car National Register Historic District were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Geneva Office Building and Power House (S.F. & San Mateo Railroad Co.Office Building), both National Register No. 10000111 and Article 10 Landmark No. 180 (500 Geneva; Parcel 6972/036). The Rezone Plan upzones this publicly owned site from the existing height of 40 feet to 85 feet and includes it in the Non-Contiguous SFMTA Special Use District, which allows the site to be developed for mixed use residential development. The Rezone Plan also increases the base height limit from 40

feet to 50 feet and changes the density to form-based, which would allow development using the State Density Bonus or other State programs that provide density or development bonuses. New development on and adjacent to this historic site could result in significant impacts. These changes were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Eligible Hayes Valley Residential Historic District, an eligible California Register Historic District. The current Rezone includes a significant portion of the District. This area of Hayes Valley was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Eligible Northpoint Sewage Treatment Plant Historic District, an eligible National Register and California Historic District. The District includes 101 North Point (Parcel 0033/005), 66 Bay Street (0034/002) and 160 Bay Street (0033/003). This entire site is increased from the existing height limit of 40 feet to 85 feet. The Rezone of this eligible district was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could have significant impacts to this District.

- Designated Dietle Residence Article 10 Landmark No.48 (294 Page Street, Parcel 0839/017). Located within and adjacent to the Hayes Valley Residential Historic District, an eligible California Register Historic District, the Rezone includes this parcel which is rezoned to RTO-1.This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Designated Nightingale House Article 10 Landmark No. 47 (201 Buchanan Street, Parcel 0858/002). Located within and adjacent to the Hayes Valley Residential Historic District, an eligible California Register Historic District, the Rezone includes this parcel which is rezoned to RTO-1.This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Designated McMorry-Lagan Building Article 10 Landmark No.164 (188-198 Haight Street, Parcels 0852/033 and 0852/034). Located within and adjacent to the Hayes Valley Residential Historic District, an eligible California Register Historic District, the Rezone includes this parcel which is rezoned to RTO-1.This parcel was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this Historic District.

- Designated Duboce Park Article 10 Historic District, specifically the contributory buildings located along Waller and Steiner Streets being rezoned RTO-1. Although certain parcels within the Duboce Park Historic District are proposed for removal from the Rezone by a pending amendment to the Upzone legislation (see list below), the contributory buildings located along Waller and Steiner Streets would remain in the Rezone. This Historic District was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

**Historic Resources Evaluated in 2022 Housing Element and 2022 EIR, But Now with Significant Height Increases**

- Designated St. Luke's Episcopal Church, National Register No. 100009644 (1755 Clay; Parcel 0622/013). Included in the 2022 EIR as being upzoned from its existing height limit of 80 feet to 240 feet, but height increased by the Rezone to 350 feet with a base height of 140 feet. These increased heights were not studied in the 2022 EIR and could have significant impacts to this historic site. Further, as the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed from the new base height.

- Designated Paige Motor Company National Register No. 83001234 (1699 Van Ness Parcel 0642/001). Included in the 2022 EIR as being upzoned from existing height limit of 80 feet to 240 feet, but height increased by the Rezone to 350 feet with a base height of 140 feet. These increased heights were not studied in the 2022 EIR and could have significant impacts to this historic site. Further, as the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed from the new base height.

- Eligible Ocean Avenue Commercial Historic District, a documented eligible California Register Historic District under review by the Planning Department. The EIR analyzed the height along Ocean Avenue at a height of 65 feet, which was increased by the Rezone to 85 feet. This increased height was not studied in the 2022 EIR and could have significant impacts to this Historic District.

- Eligible fully documented Ingleside Terraces National Register Historic District submitted to the State Historic Preservation Office and awaiting hearing by the State Historical Resource Commission. The EIR analyzed the height along Ocean Avenue, Block 6915, with a height of 65 feet, which was increased by the Rezone to both 85 feet and 140 feet. These increased heights were not included in the 2022 Housing Element or analyzed in the 2022 EIR and could have significant impacts on this fully documented historic district.

- Designated St. Francis Wood National Register Historic District No. 100007846 was listed on June 30, 2022. This historic district was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone could have significant impacts on this historic district.

- *The Gardens in the City; San Francisco Residence Parks, 1906-1940, Historic Context Statement* identified 8 residence parks neighborhoods as eligible historic districts. Since this was last heard by the Historic Preservation Commission in April 2021, St. Francis Wood has been listed on the National Register of Historic Place No. 100007846 and Ingleside Terraces has been fully documented as a National Register Historic District and submitted to the State Historic Preservation Office. Six other neighborhoods Jordan Park, West Clay Park, Forest Hill and Forest Hill Extension, Sea Cliff, Lincoln Manor and

Balboa Terrace are identified as potential historic districts. These six neighborhoods would be impacted by upzoning in and along the edges.

- Historic Category "A" rated buildings across the city would be impacted by the Rezone as it affords no protection for these previously identified, but not designated historic resources. The City of San Francisco Planning Department has previously required full Historic Resource Evaluations for projects involving Category "A" rated buildings. This policy change was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

**The following landmarks and contributors to historic districts designated pursuant to Article 10 of the San Francisco Planning Code may be removed from the Upzone by a pending amendment to the Upzone legislation:**

- Designated Telegraph Hill Article 10 Historic District. The Rezone includes this entire Historic District, which was not in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Alamo Square Article 10 Historic District. The Rezone includes most of this Historic District, including increased heights from 40 feet to 50 feet along Scott Street. This District was not in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to the District.

- Designated Webster Street Article 10 Historic District. The Rezone includes this entire Historic District, which was not in the 2022 Housing Element or analyzed in the EIR.

- Designated Haslett Warehouse, both National Register No. 75000172 and Article 10 Landmark No. 57 (680 Beach Street; Parcel 0010/002). he Rezone includes this parcel, owned by the United States National Park Service, upzoning it from its existing height of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the EIR.

- Designated San Francisco Art Institute Article 10 Landmark No 85 including the Diego Rivera Gallery Landmark No 284 (800 Chestnut Street; Parcel 0049/001). This parcel is rezoned from its existing height of 40 feet to 50 feet. This was not included in the 2022 Housing Element or analyzed in the EIR.

- Designated Ghiradelli Square, both National Register No. 82002249 and Article 10 Landmark No. 36 (920 North Point; Parcel 0452/002). This parcel is rezoned from its existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the EIR.

- Designated Goodman Building/Emeric Building, both National Register No. 75000473 and Article 10 Landmark No. 71 (1117 Geary Blvd; Parcel 0714/018). This parcel is rezoned from its existing height limit of 130 feet to 650 feet. The Rezone also increases the base height limit from 130 feet to 260 feet and changes the density to form-based, which would encourage demolition and development using the State Density Bonus or

other State programs that provide density or development bonuses. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 650 feet, which could result in significant impacts to this historic resource.

- Designated First Unitarian Church Article 10 Landmark No. 40 (1187 Franklin Street; Parcel 0713/034). This parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and, as the density is form-based, use of the State Density Bonus or other State programs that provide development bonuses would be encouraged. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 650 feet, which could result in significant impacts to this historic resource.

- Designated Earl C. Anthony Packard Showroom Article 10 Landmark No. 153 (901 Van Ness Avenue; Parcel 0719/002). The parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and, as the density is form-based, use of the State Density Bonus or other State programs that provide development bonuses would be encouraged. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 500 feet and 350 feet, which could result in significant impacts to this historic resource.

- Designated Don Lee Auto Showroom, both National Register No. 01001179 and Article 10 Landmark No.152 (1000 Van Ness Avenue; Parcel 0715/014). This parcel is rezoned from its existing height limit of 130 feet to 500 feet. The Rezone also increases the base height limit from 130 feet to 200 feet and as the density is form-based, use of the State Density Bonus or other State programs that provide development bonuses would be encouraged. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 500 feet and 650 feet, which could result in significant impacts to this historic resource.

- Designated Stradtmuller House, both National Register No. 76000523 and Article 10 Landmark No. 35 (819 Eddy Street; Parcel 0743/015). This parcel is rezoned from its existing height limit of 130 feet to 300 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 350 feet, which could result in significant impacts to this historic resource.

- Designated Engine Company Number 31 Fire House Article 10 Landmark No. 220 (1088 Green St (0121/010). This parcel is now within the Rezone but was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic building.

- Designated Clay Theater Article 10 Landmark No. 302 (2261 Fillmore Street; Parcel 0630/002). This parcel and area of Fillmore Street are rezoned from their existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and this could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, it is surrounded by parcels zoned to 65 feet, which could result in significant impacts to this historic resource.

- Designated Calvary Presbyterian Church National Register No 78000755 and Article 10 Landmark No. 103 (2501 Fillmore Street; Parcel 0587/027). This parcel and area of Fillmore are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the 2022 EIR. This could result in significant impacts to this historic site.

- Designated Grace Cathedral Article 10 Landmark No. 170 (1100 California Street; Parcel 0246/001). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR. This could result in significant impacts to this site.

- Designated Chambord Apartments, both Article 10 Landmark No. 106 and National Register No. 84001184 (1298 Sacramento Street; Parcel 0221/125). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR. This could result in significant impacts to this site.

- Designated Old Flood Mansion, Pacific Union Club, both Article 10 Landmark No. 64 and National Register No. 66000230 (1000 California Street; Parcel 0245/001). This parcel and area of Nob Hill are now within the Rezone but were not included in the 2022 Housing Element or analyzed in the EIR. This could result in significant impacts to this site.

- Designated Westfield House Article 10 Landmark No. 135 (1198 Fulton Street, Parcel 0777/015) located in the Alamo Square Article 10 Historic District. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR. The Rezone could result in significant impacts to this historic site and the Alamo Square Historic District.

- Designated Third Baptist Church Complex Article 10 Landmark No. 275 (1399 McAllister Street, Parcel 0778/013). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR. The Rezone could result in significant impacts to this historic site.

- Designated Archbishop's Mansion Article 10 Landmark No. 151 (1000 Fulton Street, Parcel 0778/006) located in the Alamo Square Article 10 Historic District. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR. The Rezone could result in significant impacts to this historic site and the Alamo Square Historic District.

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- Designated Abner Phelps House, both National Register No. 71000187 and Article 10 Landmark No. 32 (1111 Oak Street; Parcel 1218/050). This parcel is rezoned from its existing height limit of 40 feet to 50 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Designated Sarah Mish House, both National Register No. 79000534 and Article 10 Landmark No. 62 (1153 Oak Street; Parcel 1218/029). This parcel is rezoned from its existing height limit of 40 feet to 50 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site.

- Designated Firehouse Engine Company No. 2, both Article 10 Landmark No. 89 (1152 Oak Street, Parcel 1215/010) and a contributor to the Buena Vista North Historic District, an eligible California Register Historic District. The inclusion of this parcel in the Rezone was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned 65 feet and 85 feet, this could result in significant impacts to this historic resource.

- Designated Richard Doolan/Norman Larson Residence Article 10 Landmark No. 253 (557 Ashbury Street, Parcel 1231/009). As the density is form-based, the use of the State Density Bonus or other State programs that provide development bonuses would be allowed. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned to 65 feet with form-based density and rezoned to RTO-C, this could result in significant impacts to this historic resource.

- Designated Theodore Green Apothecary Article 10 Landmark No. 182 (500 Divisadero Street, Parcel 1203/017A). This parcel is rezoned from its existing height limit of 65 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Designated Charles L. Hinkel House and Carriage House Article 10 Landmark No. 190 (280 Divisadero Street; Parcel 1238/023). This parcel is rezoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Designated Old Saint Patrick's Church Article 10 Landmark No. 6 (1820 Eddy Street, Parcel 1127/007A). This parcel now included in the Rezone and changed to form-based density (density decontrol) and rezoned from RM-3 to RTO-C which allows commercial uses on the ground floor. These changes were not included in the 2022 Housing

Element or analyzed in the EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned to 65 feet with form-based density and rezoned to RTO-C, this could result in significant impacts to this historic resource.

- Glazer-Keating House Article 10 Landmark No. 251 (1110 Taylor Street, Parcel 0222/018). The Rezone now includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Merryvale Antiques (S.F. Gas Light Co.) Article 10 Landmark No 58 (3640 Buchanan Street, Parcel 0459/003) This parcel is included in the Rezone and changed to form-based density (density decontrol). The Rezone now includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Ladies Protection and Relief Society Article 10 Landmark No 320 ( 3400 Laguna Street, Parcel 0471/003). The Rezone now includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Blackstone Court Article 10 Historic District (30 Blackstone Court, 1545 Lombard Street, and 1549 Lombard Street (Parcels 0504/003, 0504/003H & 0504/019). The Rezone increases the height of two of the parcels in this District from 40 feet to140 feet and the density is changed to form-based. This Historic District was not included in the 2022 Housing Element or analyzed in the EIR. Even if this parcel is removed from the Rezone, because it is surrounded by parcels zoned to 140 feet with form-based density, this could result in significant impacts to this historic resource.

- North End Police Station and Garage Article 10 Landmark No. 218 (2475 Greenwich, Parcel 0513/015). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Filbert Street Cottages Article 10 Landmark No 232 (1338 Lombard Street, Parcel 0524/031). This parcel is rezoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR and could result in significant impacts to this historic site. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Metro Theater Article 10 Landmark No 261 (2055 Union Street, Parcel 0541/018. The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 65 feet. This site was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- The Colonial Dames (McElroy) Octagon House Article 10 Landmark No. 17 and National Register No 720000250 (2645 Gough Street, Parcels 0544/001 and 0544/001C. This historic site, included in the Upzone, is rezoned from its existing height limit of 40 feet to 65 feet and its density changed to form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Alhambra Theater Article 10 Landmark No. 21 (2320-366 Polk Street, Parcel 0548/022). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 to 85 and now form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- The Burr Mansion Article 10 Landmark No.31 and National Register #14000967 (1772 Vallejo Street, Parcel 0552/029). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Golden Gate Valley Carnegie Library Article 10 Landmark No. 300 (1801 Green Street, Parcel 0554/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Casebolt House Article 10 Landmark No 51 (2727 Pierce Street, Parcel 0560/005). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Church For The Fellowship of All People Article 10 Landmark No. 309 (2041 Larkin Street, Parcel 0572/003). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 65 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 85 feet, this could result in significant impacts to this historic resource.

- Engine Company No. 8 Truck No. 4 Article 10 Landmark No. 188 (1648 Pacific St., Parcel 0574/011). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 feet to 350 feet. This extreme upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 350 feet, this could result in significant impacts to this historic resource.

- Talbot-Dutton House Article 10 Landmark No. 57 (2200 Franklin/1782 Pacific Avenue, Parcel 0575/010). The Rezone includes this parcel, which is upzoned from its existing height limit of 80 feet to 240 feet, its density is changed form-based, and rezoned from residential to RTO-C. This extreme rezoning was not included in the 2022 Housing Element or analyzed in the2022 EIR. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 240 feet to 350 feet, this could result in significant impacts to this historic resource.

- St. Brigid's Church Article 10 Landmark No. 252 (2151 Van Ness Avenue, Parcel 575/015). The Rezone includes this parcel, which is upzoned from its existing height limit of 80 feet to 350. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 240 feet to 350 feet, this could result in significant impacts to this historic resource.

- Bourne Mansion Article 10 Landmark No 38 (2550 Webster Street, Parcel 0580/013). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 65 feet, and rezoned from residential to RTO-C. Even if this parcel is removed from the Rezone, because it is adjacent to parcels zoned up to 65 feet, this could result in significant impacts to this historic resource.

- Leale House Article 10 Landmark No. 45 (2475 Pacific Avenue, Parcel 0587/018). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Whittier Mansion Article 10 Landmark No. 75 and National Register No 76000524 (2090 Jackson St, Parcel 0591/007). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Haas-Lilienthal House Article 10 Landmark No. 69 and National Register No 730000438 (2007 Franklin St. 0600/002). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Spreckels Residence Article 10 Landmark No. 197 (2080 Washington Street, Parcel 0601/005. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Sacred Heart Parish Complex Article 10 Landmark No.316 and National Register 10000112 (660 Oak Street, Parcel 0828/012; 735 Fell Street, Parcel 0828/022A; 554 Filmore Street, Parcel 0828/22; and 546-548 Filmore Street, Parcel 0828/21). The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the EIR.

- Market Street Masonry Historic District Article 10 Historic District and listed in the California Register of Historical Resources (7 non-contiguous historic buildings on Market Street Between Franklin Street and Valencia Street, including Parcels 3504/038, 3504/040, 3504/046, 3504/001, 0854/004 and 0854/005, and the Miramar Apartments at 1582 Market Street, Parcel 0836/010. The Rezone includes the parcels in this District, which are upzoned from their existing height limit of 85 feet to 140 feet. Even if these parcels are removed from the Upzone, because they are surrounded by parcels rezoned to 140 feet, this could result in significant impacts to this historic resource.

- Health Sciences Library Article 10 Landmark No. 115 (2395 Sacramento Street, Parcel 0637/016). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- William Vale House Article 10 Landmark No. 168 (2226 California Street, Parcel 0637/040). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet, and the density is changed to form-based. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 85 feet, this could result in significant impacts to this historic resource.

- Chambers Mansion Article 10 Landmark No.119 (2220-2222 Sacramento Street, Parcel 0627/054). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Richard E. Queen House Article 10 Landmark No. 198 (2212 Sacramento Street, Parcel 0627/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Atherton House Article 10 Landmark No. 70 and National Register No. 79000527 (1990 California Street, Parcel 0640/010). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet, and rezoned from residential to RTO-C. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 85 feet, this could result in significant impacts to this historic resource.

- Isaac Wormser House/John C. Coleman House Article 10 Landmark No. 53 (1834 California Street, Parcel 0641/005). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Lilienthal-Orville Pratt House Article 10 Landmark No. 55 (1818-1820 California Street, Parcel 0641/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Golden Gate Commandery of the Knights Templar (Macedonia Missionary Baptist Church Article 10 Landmark No. 202 (2135 Sutter Street, Parcel 0682/006). The Rezone includes this parcel, which is upzoned from its existing height limit of 50 feet to 85 feet and is now form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Richardson Hall Article 10 Landmark Nos. 256, 257, and 258 (55 Laguna Street, Parcel 0870/001). The Rezone includes these Landmarks, which are upzoned from their existing height limits to 85 feet and their density has been changed to form-based. These buildings were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Carmel Fallon Building Article 10 Landmark No. 223 and Contributor to the designated Hayes Valley Residential Historic District listed on the California Register of Historic Resources (1800-1806 Market Street, Parcel 0871/014). The Rezone includes this parcel, which is upzoned from its existing height limit of 85 feet to 120 feet and its density has been changed to form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone,

because it is surrounded by parcels rezoned to 140 feet, this could result in significant impacts to this historic resource.

- Roos Residence both Article 10 Landmark No. 56 and National Register 09000805 (3500 Jackson Street, Parcel 0970/002). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Ellingwood House Article 10 Landmark No. 207 (2799 Pacific Ave, Parcel 0978/010) and within the California Register eligible Presidio Heights Historic District. The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Koshland House Article 10 Landmark No. 95 and National Register No. 84001186, within the CA eligible Presidio Heights Historic District. (3800 Washington, Parcel 0989/028). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Ortman-Shumate House Article 10 Landmark No. 98 (1901 Scott Street, Parcel 1027/003). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Theodore Roosevelt Jr. High School Article 10 Landmark No. 285 (460 Arguello Street, Parcel 1061/049). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- San Francisco Memorial Columbarium Article 10 Landmark No. 209 (1 Loraine Court, Parcel 1084/002).The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Clunie House Article 10 Landmark No. 128 (301 Lyon Street, Parcel 1207/008). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Alfred G. Hanson Residence Article 10 Landmark No. 196 (128 27th Avenue, Parcel 1332/049). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- St. John's Presbyterian Church Article 10 Landmark No. 83 (201 Arguello Boulevard, Parcel 1361/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Campfire Girls Building Article 10 Landmark No. 169 (325 Arguello Boulevard), Parcel 1432/003). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Richmond Branch Library Article 10 Landmark No. 247 (351 9th Avenue, Parcel 1441/007). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Refugee Shack Article 10 Landmark No. 171 (1227 24th Avenue, Parcel 1726/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Doelger Building Article 10 Landmark No.265 (320-26 Judah Street, Parcel 1763/020). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet and its density has been changed to form-based. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 85 feet, this could result in significant impacts to this historic resource.
- Old Fire House Article 10 Landmark No.29 (1348 10th Avenue, Parcel 1764/031). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Sunset Branch Library Article 10 Landmark No. 239 (1305-49 18th Street, Parcel 1773/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 65, 85 and 140 feet, this could result in significant impacts to this historic resource.
- Shriners' Hospital for Crippled Children Article 10 Landmark No.221 (1601 19th Avenue, Parcel 1924/004). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- San Francisco Conservatory of Music Article 10 Landmark No. 242 (1201 Ortega Street, Parcel 2115/037). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- The McCormick House Article 10 Landmark No. 208 (4040-4042 17th Street, Parcel 2623/012). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 120 feet, its density is changed form-based, and it is rezoned from residential to RTO-C. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 140 feet with form based density, this could result in significant impacts to this historic resource.
- Alfred E. (Nobby) Clarke Mansion Article 10 Landmark No. 80 (250 Douglass St., Parcel 2700/001). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- Miller-Joost House Article 10 Landmark No. 79 (3224 Market Street, Parcel 2704/040). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.
- David Lewis House Article 10 Landmark No.186 (4143 23rd Street, Parcel 2804/040). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 171 San Marcos Avenue (aka Cowell House) Article 10 Landmark No. 270 (171 San Marcos Avenue, Parcel 2882/035). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- El Rey Theater Article 10 Landmark No.274 (1970 Ocean Avenue, Parcel 3280/018). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Juvenile Court and Detention Center Article 10 Landmark No. 248 (170 Otis Street, Parcel 3513/207). The Rezone includes this parcel, which is upzoned from its existing height limit of 125 feet to 160 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 396-398 12th Street (aka San Francisco Eagle Bar) Article 10 Landmark No. 295 (396-398 12th Street, Parcel 3522/014). The Rezone includes this parcel, which is upzoned from its existing height limit of 55 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Saint Francis Lutheran Church Article 10 Landmark No. 39 (152 Church Street, Parcel 3537010). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 85 feet. This was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Swedish American Hall Building Article 10 Landmark No. 267 (2168-2174 Market Street, Parcel 3542/062). The Rezone includes this parcel, which is upzoned from its existing height limit of 40-50 feet to 120 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 120 feet and 160 feet with form based density, this could result in significant impacts to this historic resource.

- 2117-2123 Market Street (aka New Era Hall) Article 10 Landmark No. 277 (2117-2123 Market Street, Parcel 3543/012). The Rezone includes this parcel, which is upzoned from its existing height limit of 40-50 feet to 120 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 120 feet and 160 feet with form based density, this could result in significant impacts to this historic resource.

- 22 Beaver Street (aka Benedict-Gieling House) Article 10 Landmark No. 284 (22 Beaver Street, Parcel 3561060). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 50 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- The Jose Theater/Names Project Building Article 10 Landmark No. 241 (2362 Market Street, Parcel 3562/011). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 feet to 120 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the

Upzone, because it is surrounded by parcels rezoned to 120 feet and 160 feet with form based density, this could result in significant impacts to this historic resource.

- Mission Dolores Article 10 Landmark No. 1 and National Register No.72000251 (310-20 Dolores Street, Parcel 3566/001). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 50 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the EIR.

- Mission High School Article 10 Landmark No. 255 (3750 18th Street, Parcel 3579/006). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the EIR.

- Twin Peaks Tavern Article 10 Landmark No. 264 (3997 17th Street, Parcel 3582/071). The Rezone includes this parcel as being upzoned from its existing height limit of 65 feet to 160 feet and its density is changed to form-based. While this site was included in the 2022 Housing Element and the 2022 EIR as upzoned to 85 feet, the Rezone upzones it to 160 feet. Even if this parcel is removed from the Upzone, because it is surrounded by parcels rezoned to 160 feet with form based density, this could result in significant impacts to this historic resource.

- Castro Theater Article 10 Landmark No. 100 (429-431 Castro Street, Parcel 3582/085). The Rezone includes this parcel, which is upzoned from its existing height limit of 65 feet to 85 feet and its density is changed to form-based. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR. Even if this parcel is removed from the Upzone, because it is adjacent to parcels rezoned to 160 feet with form based density, this could result in significant impacts to this historic resource.

- Castro Camera Article 10 Landmark No. 227 (573-75 Castro Street, Parcel 3583/061). The Rezone includes this parcel, which is upzoned from its existing height limit of 40 feet to 50 feet. This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Axford House Article 10 Landmark No. 133 (1190 Noe Street, Parcel 6538/048). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Carnegie Noe Valley/Sally Brunn Branch Library Article 10 Landmark No. 259 (451 Jersey Street, Parcel 6539/034). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 651 Duncan Street (aka Lyon-Martin House) Article 10 Landmark No. 292 (651 Duncan Street, Parcel 6604/036). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Sunnyside Conservatory Article 10 Landmark No. 78 (236 Monterey Blvd, Parcel 6770/057). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Joseph Leonard/Cecil F. Poole House Article 10 Landmark No. 213 (90 Cedro Avenue, Parcel 6908/016). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- 1345 Ocean Ave (aka Ingleside Presbyterian Church and the Great Cloud of Witnesses) Article 10 Landmark No. 273 (1345 Ocean Avenue, Parcel 6942/050). The Rezone includes this parcel, which is upzoned from its existing height limit of 50 feet to 85 feet.

- This upzoning was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Sherman House Article 10 Landmark No. 49 (2160 Green Street, Parcels 0540/030 and 0540/028). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Gibbs Residence and Caretaker's Cottage Article 10 Landmark 203 (2622-24 Jackson Street and 2624-29 Pacific Avenue, Parcels 0585/008, 0585/009 and 0585/010). The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the 2022 EIR.
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- Southern Pacific Co. Hospital Complex Article 10 Landmark No. 192 and National Register 89000319 (1400-1599 Fell Street & 1509-1599 Hayes Street, Parcels 1206/002 and 1206/003). Also within the Panhandle Historic District, an eligible California Register Historic District. The Rezone includes these parcels, which were not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Edward Coleman House Article 10 Landmark No. 54 (1701 Franklin Street, Parcels 0641/014 and 0641/015). The Rezone includes this parcel, which was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

- Designated Duboce Park Article 10 Historic District, is proposed for removal from the Rezone except for the contributory buildings located along Waller and Steiner Streets are proposed to be rezoned RTO-1, remaining in the Rezone. This Historic District was not included in the 2022 Housing Element or analyzed in the 2022 EIR.

**Attachment 2: North Beach National Register of Historic Places Historic District**
**Parcel Analysis Within Rezone**
**November 30, 2025**
**Compiled by Bridget Maley, architecture + history, llc**

| Address | APN Number | Year Built | District Status |
|---|---|---|---|
| 490 Lombard St | 0062017B | 1926 | C |
| 1916-18 Stockton St | 0062017C | 1940 | C |
| 1922-24 Stockton St | 0062017D | 1940 | C |
| 1934-36 Stockton St | 0062017E | 1940 | C |
| 1946-48 Stockton St | 0062019 | 1908 | C |
| 1952-56 Stockton St | 0062020 | 1908 | C |
| 1958-60 Stockton St | 0062021 | 1906 | C |
| 379-99 Chestnut St/1952-56 Stockton | 0062022 | 1906 | C |
| 1940 Stockton St | 0062052-058 | 1980 | NC |
| 401 Chestnut St/1957-61 Stockton | 0063001 | c. 1906 | C |
| 1951-55 Stockton St | 0063002 | 1906 | C |
| 1943-47 Stockton St | 0063003 | 1907 | C |
| 1935-41 Stockton St | 0063004 | 1907 | C |
| 1929-33 Stockton St | 0063005 | 1907 | C |
| 1923-25 Stockton St | 0063006 | 1908 | C |
| 1915-17 Stockton St | 0063007 | 1907 | C |
| 1901-05 Stockton St | 0063009 | 1906 | C |
| 520-24 Lombard St | 0063010 | 1911 | C |
| 526-30 Lombard St | 0063011 | 1909 | C |
| 532-36 Lombard St | 0063012 | 1912 | C |
| 538-42 Lombard St | 0063013 | 1912 | C |
| 544-46 Lombard St | 0063014 | 1916 | C |
| 548 Lombard St | 0063015 | 1926 | NC |
| 566-76 Lombard St | 0063017 | 1908 | C |
| 590-94 Lombard St | 0063018 | 1925 | C |
| 2006-08 Powell St | 0063018A | 1924 | C |

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| Address | APN Number | Year Built | District Status |
|---|---|---|---|
| 2018-20 Powell St | 0063018C | 1924 | NC |
| 2024-30 Powell St | 0063019 | 1906 | C |
| 2038-40 Powell St | 0063021 | 1956 | NC |
| 2044-48 Powell St | 0063022 | 1909 | C |
| 2050-64 Powell St | 0063023 | 1907 | C |
| 475 Chestnut St | 0063024 | 1946 | C |
| 461-67 Chestnut St | 0063025 | c. 1907 | C |
| 455-59 Chestnut St | 0063025A | 1908 | C |
| 449-53 Chestnut St | 0063026 | 1912 | C |
| 443-47 Chestnut St | 0063027 | 1908 | C |
| 437-41 Chestnut St | 0063027A | 1908 | C |
| 427 Chestnut St | 0063028 | 1932 | C |
| 421-23 Chestnut St | 0063029 | 1907 | C |
| 1907-13 Stockton St | 0063030-033 | 1906 | C |
| 560-64A Lombard St | 0063034-036 & 16A | 1907 | C |
| 2032-34 Powell St | 0063037-038 | 1912 | C |
| 2061-65 Powell St | 0064001 | 1906 | C |
| 2055-59 Powell St | 0064002 | 1908 | C |
| 2049-53 Powell St | 0064003 | 1909 | C |
| 2043-47 Powell St | 0064004 | 1909 | C |
| 2035-41 Powell St | 0064005 | 1909 | C |
| 2027-31 Powell St | 0064006 | 1907 | C |
| 2017-21 Powell St | 0064007 | 1912 | C |
| 602-04 Lombard St | 0064009 | 1926 | C |
| 616-18 Lombard St | 0064032 | 1922 | C |
| 2011-15 Powell St | 0064033-035 | c. 1912 | C |
| 513-19 Lombard St | 0076001 | 1917 | C |

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| Address | APN Number | Year Built | District Status |
|---|---|---|---|
| 1847-57 Stockton St | 0076003 | 1910 | C |
| 1843 Stockton St | 0076004 | 1906 | NC |
| 1815-25 Stockton St | 0076006 | 1907 | C |
| 1807-09 Stockton St | 0076007 | 1907 | C |
| 1801-03 Stockton St | 0076008 | 1908 | C |
| 622-24 Greenwich St | 0076009 | 1908 | C |
| 628-30 Greenwich St | 0076010 | 1908 | C |
| 638-42 Greenwich St & 632A Greenwich | 0076011 | 1906 | C |
| 644-46 Greenwich St | 0076012 | 1925 | C |
| 652-56 Greenwich St | 0076013 | 1906 | C |
| 658-64 Greenwich St | 0076014 | 1907 | C |
| 666-76 Greenwich St | 0076015 | 1906 | C |
| 678-80 Greenwich St | 0076016 | 1906 | C |
| 1906 Powell St & 690-92 Greenwich | 0076017 | 1923 | C |
| 1918-22 Powell St | 0076020 | 1906 | C |
| 1930-34 Powell St | 0076022 | 1912 | C |
| 1936-38 Powell St | 0076023 | 1906 | C |
| 1942-46 Powell St | 0076024 | 1912 | C |
| 1948-54 Powell St | 0076025 | 1914 | C |
| 1956-66 Powell St | 0076025A | 1914 | C |
| 585-87 Lombard St | 0076025B | 1908 | C |
| 567-79 Lombard St | 0076026 | 1914 | C |
| 563-65 Lombard St | 0076027 | 1906 | C |
| 551-61 Lombard St | 0076027A | 1914 | C |
| 547-49 Lombard St | 0076028 | 1913 | C |
| 537-39 Lombard St | 0076030 | 1907 | C |

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| Address | APN Number | Year Built | District Status |
|---|---|---|---|
| 1 Tuscany Alley | 0076032 | 1906 | C |
| 529-31 Lombard St | 0076033 | 1925 | C |
| 525-27 Lombard St | 0076033A | 1925 | C |
| 543-45 Lombard St | 0076034-035 | 1925 | C |
| 1839-41 Stockton St | 0076054-055 | c. 2014 | NC |
| 1924-26 Powell St | 0076056-057 | 1922 | C |
| 1865-76 Stockton St | 0076058-059 | 1906 | C |
| 5-11 Edith St/1721-25 Grant | 0077008 | 1913 | C |
| 1707-09 Grant Ave | 0077009 | 1907 | NC |
| 1703-05 Grant Ave | 0077010 | 1909 | NC |
| 500-12 Greenwich St | 0077011 | 1908 | C |
| 514-16 Greenwich St & 15-17 Edith | 0077012 | 1924 | C |
| 520-22 Greenwich St & 19-21 Edith | 0077013 | 1910 | C |
| 528-30 Greenwich St & 25-27 Edith | 0077014 | 1909 | C |
| 532-34 Greenwich St | 0077015 | 1908 | C |
| 540 Greenwich St & 33-35 Edith | 0077016 | 1931 | C |
| 544-46 Greenwich St & 43-45 Edith | 0077017 | 1912 | C |
| 550-52 Greenwich St & 49-51 Edith | 0077018 | 1912 | C |
| 558-60 Greenwich St | 0077019 | 1911 | C |
| 562-64 Greenwich St | 0077020 | 1908 | C |
| 568-70 Greenwich St | 0077021 | 1908 | C |
| 586-90 Greenwich St | 0077023 | 1908 | C |
| 1800-04 Stockton St | 0077023A | 1907 | C |
| 1814 Stockton St | 0077024 | 1966 | C |
| 1816-20 Stockton St | 0077025 | 1911 | C |
| 1822-26 Stockton St | 0077026 | 1915 | C |
| 1828-32 Stockton St | 0077027 | 1914 | C |

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| Address | APN Number | Year Built | District Status |
|---|---|---|---|
| 1848 Stockton St | 0077030 | 1907 | C |
| 1852-56 Stockton St | 0077031 | 1906 | C |
| 1858-60 Stockton St | 0077032 | 1914 | C |
| 1864-66 Stockton St | 0077032A | 1915 | C |
| 576-80 Greenwich St | 0077049-051 | 1997 | NC |
| 1840-44 Stockton St | 0077052-054 | 1911 | C |
| 1653-67 Grant Ave | 0088001 | 1908 | C |
| 1647-51 Grant Ave | 0088002 | 1908 | C |
| 1639-45 Grant Ave | 0088003 | 1913 | C |
| 1635-37 Grant Ave | 0088004 | 1908 | C |
| 12-26 Medau Place & 1615-33 Grant | 0088005 | 1908 | C |
| 1601 Grant Ave | 0088006 | 1965 | NC |
| 540-50 Filbert St & 51-61 Medau | 0088009 | 1909 | C |
| 552-56 Filbert St & 63-65 Medau | 0088010 | 1906 | C |
| 558-62A Filbert St | 0088011 | 1907 | C |
| 566 Filbert St | 0088012 | c. 1907 | C |
| 570-74 Filbert St & 12-18 Krausgrill | 0088013 | 1907 | C |
| 579-81 Greenwich St | 0088023 | 1908 | C |
| 561 Greenwich St | 0088025 | 1961 | C |
| 551-57 Greenwich St | 0088026 | 1911 | C |
| 547-49 Greenwich St | 0088027 | 1911 | C |
| 533-57 Greenwich St | 0088029 | 1912 | C |
| 517-23 Greenwich St | 0088031 | 1912 | C |
| 1-3 Kramer Place | 0088034 | 1910 | C |
| 577 Greenwich St | 0088036 | 1909 | C |
| 567-69 Greenwich St | 0088037 | 1906 | C |
| 19-33 Medau Place | 0088041-048 | 1909 | C |

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| Address | APN Number | Year Built | District Status |
|---|---|---|---|
| 526-30 Filbert St | 0088052-054 | 1912 | C |
| 532-36 Filbert St | 0088055-057 | c. 1986 | NC |
| 539-45 Greenwich St | 0088058-061 | 1913 | C |
| 525-31 Greenwich St | 0088071-072 | 1914 | C |
| 7-9 Kramer Place | 0088073-074 | 1910 | C |
| 608-20 Filbert St | 0089011 | 1951 | C |
| 622-26 Filbert St | 0089013 | 1913 | C |
| 630-34 Filbert St | 0089014 | 1910 | C |
| 650-60 Filbert St | 0089015 | 1912-1939 | C |
| 666 Filbert St | 0089016 | 1917 | C |
| 673-77 Greenwich St | 0089022A | 1915 | C |
| 667-71 Greenwich St | 0089022B | 1914 | NC |
| 695-99 Greenwich St | 0089022C | 1925 | C |
| 659-59BGreenwich St | 0089024 | 1907/2002 | C/NC |
| 651-55 Greenwich St | 0089025 | 1908 | C |
| 643 Greenwich St | 0089026 | 1907 | C |
| 637-41 Greenwich St | 0089027 | 1911 | C |
| 637A-641A Greenwich St | 0089027 | unknown | C |
| 619-21 Greenwich St | 0089029 | 1961 | C |
| 1856-60 Powell St | 0089031-036 | 1934 | C |
| 625-27 Greenwich St | 0089038 | 1908 | C |
| 631A-C Greenwich St | 0089039-041 | 1983 | NC |
| 1850-52 Powell St | 0089042-043 | 1933 | C |
| 661-65 Greenwich St | 0089044-046 | 1906 | C |
| 680 Filbert St | 0089048-049 | 1971 | NC |
| 690 Filbert St | 0089050-051 | 1961 | NC |

# EXHIBIT C

Shawn Smallwood, PhD
3108 Finch Street
Davis, CA 95616

Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

24 October 2025

RE: San Francisco Housing Element 2022 Update FEIR Addendum

Dear Mr. Drury,

I write to comment on potential impacts on biological resources from the proposed Addendum to the San Francisco Housing Element 2022 Update Final Environmental Impact Report (FEIR). The FEIR, which was adopted by the Board of Supervisors and later signed by the Mayor on 31 January 2023, evaluated the impacts on the environment that could result from adoption and implementation of the San Francisco Housing Element 2022 Update. According to the Addendum, the FEIR anticipated "future actions, such as San Francisco Planning Code … amendments, designation of housing sustainability districts, and approval of development projects consistent with the goals, policies, and actions of the housing element update." The Addendum characterizes the proposed actions as "reasonably foreseeable changes," and states that its purpose "is to evaluate the environmental impacts of the rezoning program and document the San Francisco Planning Department's … determination that these impacts are adequately addressed in the FEIR." I am concerned that the proposed actions in the Addendum have not been adequately addressed, and that the action's impacts on wildlife would be excessive and highly significant.

My qualifications for preparing expert comments are the following. I hold a Ph.D. degree in Ecology from University of California at Davis, where I also worked as a post-graduate researcher in the Department of Agronomy and Range Sciences. My research has been on animal density and distribution, habitat selection, wildlife interactions with the anthrosphere, and conservation of rare and endangered species. I authored many papers on these and other topics. I served as Chair of the Conservation Affairs Committee for The Wildlife Society – Western Section. I am a member of The Wildlife Society and Raptor Research Foundation, and I've lectured part-time at California State University, Sacramento. I was Associate Editor of wildlife biology's premier scientific journal, The Journal of Wildlife Management, as well as of Biological Conservation, and I was on the Editorial Board of Environmental Management. I have performed wildlife surveys in California for thirty-seven years. My CV is attached.

## POTENTIAL IMPACTS ON THE WILDLIFE COMMUNITY

The Addendum claims that the FEIR's analysis of wildlife impacts potentially caused by the originally planned 50,000 residential units have already addressed the impacts of the additionally proposed of 4,000 residential units. It further claims that the change in

outlay of the height and density of the originally planned 50,000 residential units are irrelevant to the analysis of potential impacts on wildlife. Deemed in no need of additional environmental review is the planned addition of 4,000 residential units, major shifts in the spatial distribution of the original 50,000 units, and increases in maximum building heights from 300 feet to 650 feet.

The Addendum (p. 48) points out that the FEIR had determined that future development associated with the adopted housing element would not adversely affect candidate, sensitive, or special-status species or sensitive natural communities, nor would it interfere with wildlife movement. I disagree with these determinations as they applied to the originally planned 50,000 residential units, as these determinations were simply not credible in the face of this much change to the environment. Here and now the City attempts to extend these same claims to the development associated with an additional 4,000 residential units and to substantial shifts in the spatial and vertical outlay of all 54,000 residential units.

One rationalization for the determinations was that special-status species such as peregrine falcon are adapted to the structural environment of San Francisco. Another was that compliance with existing state and federal regulations would ensure less-than-significant impacts to nesting birds. And for bats, the rationale was that compliance with the open space element of the general plan (Chapter 8 of the San Francisco Environment Code), would avoid potential impacts. These rationalizations, however, were speculative, having cited no evidence in their support. There was no citation of any comparative study of peregrine falcon population performance within the City versus in natural areas. There was no citation of monitoring data that would support the notion that existing state and federal regulations have been preventing significant impacts to nesting birds in the face of development pressure. There was no citation of monitoring data that would support the notion that Chapter 8 of the San Francisco Environment Code has managed to avoid development impacts on bats. Instead of relying on scientific inference, each argument leading to less-than-significant impact determinations was speculative. And this same strategy is carried forward in the Addendum with respect to the added 4,000 residential units and the changes in lateral and vertical outlay.

In fact, the evidence is overwhelming that overall bird abundance is on the decline, having declined 29% across North America over the past half-century (Rosenberg et al. 2019). In fact, all but three of the bat species in California are special-status species, indicating that bats as a taxonomic group are of serious conservation concern in California. And in fact, along with my co-investigator I have measured substantial declines in birds and special-status species as results of development projects (Smallwood and Smallwood 2023). The Addendum selects Peregrine falcon as an anecdote to imply that all birds simply adapt to the cityscape, but even the Peregrine falcon is vulnerable to window collisions. As another anecdote to the Addendum's, I happened to be in a meeting with attorneys of the California Attorney General's Office and agents with the U.S. Fish and Wildlife Service when we observed a Peregrine falcon nearly collide with our 14$^{th}$ story window as it chased after a rock pigeon in Oakland. And yet another anecdote from a few years ago, a Peregrine falcon fledgling fatally

collided with a window on the same UC Berkely building where it attempted its first flight from the nest. Peregrine falcons are vulnerable to window collision mortality just like any other bird, and perhaps even more so.

The Addendum does not consider the potential loss and fragmentation of the aerosphere in which these species travel and forage. The aerosphere is that part of the gaseous atmosphere where birds and bats and other volant animals with wings migrate, disperse, forage, perform courtship and where some of them mate (Davy et al. 2017, Diehl et al. 2017). Nor does the Addendum give any consideration to the potential loss and fragmentation of aerohabitat, which is that portion of the aerosphere used by each species (Kunz et al. 2008), and usually within 1,000 feet of the ground. Although both the peregrine falcon and bats often take prey on the ground, these animals are known for taking prey largely on the wing. These animals hunt other volant wildlife, which means that both these hunters and their prey perform vital life functions and interact with each other within the aerosphere. As for nesting birds, there would be no nesting birds without the birds' access to the aerosphere. Despite the vital importance of the aerosphere to peregrine falcons, nesting birds, and to bats, the Addendum fails to recognize the aerosphere as essential habitat to volant wildlife.

The Addendum does recognize that the new buildings would pose barriers to movement and collision hazards to birds. At page 49, the Addendum warns, "Changes to building heights could result in new impacts on migratory species if they result in flight paths being obstructed, more bird strikes, or impacts on falcon nesting habitat." The Addendum then dismisses these potential impacts by citing the adoption in the Aesthetics section of the FEIR of planning code section 139's Standards for Bird-Safe Buildings. However, there exist major logic problems with this purported solution. First, the standards for bird-safe buildings do not avoid the barrier effects of buildings, and in fact the strategic objective of bird-safe building guidelines is to increase the visibility of buildings as barriers to bird movement so that birds less often collide with the structural glass on the exteriors of the buildings. Second, the Standards for Bird-Safe Buildings, while meritorious as a first step toward reducing bird-window collision mortality, are of unmeasured efficacy. While it is great that the City adopted the Bird-Safe Guidelines, the City has yet to follow up with any study of whether or to what degree the Standards truly minimize or reduce bird-window collision mortality. In the face of this uncertainty, the additional 4,000 residential units, greater building heights, and revised spatial distribution could result in significantly larger numbers of collision fatalities compared to the 2022 plan, despite implementation of the City's Standards for Bird-Safe Buildings.

In my assessment, there are 147 special-status species of wildlife documented near enough to the project site to warrant a closer look at their occurrence likelihoods for the purpose of predicting potential project impacts (Table 1). Of these 147 special-status species, 14 are bats that, if they truly occur where construction would take place, would be at risk of losing aerohabitat in which they travel and forage. Another 112 special-status species of wildlife would be birds, 49 of which have been documented throughout the project area, eight of which are known to be centrally located, six are known to Golden Gate Park or Lake Merced, and 19 of which have been documented as generally

coastal. All these bird species would be vulnerable to collision mortality and greater expenditures of indispensable energy to negotiate the structural hazards of another 4,000 residential units and the reallocation of vertical building heights across the planning area.

All the birds represented in Table 1 can quickly fly from wherever they have been documented to any of the new buildings that would be part of the added project, so they would all be within brief flights to the proposed project's windows. At the California Academy of Sciences, the glass facades facing adjacent gardens killed 0.077 and 0.086 birds per $m^2$ of glass per year (Kahle et al. 2016), which might look like small numbers at first read, but which translate to large numbers of dead birds when projected to the extent of glass in the project (see below).

Window collisions are often characterized as either the second or third largest source or human-caused bird mortality. The numbers behind these characterizations are often attributed to Klem's (1990) and Dunn's (1993) estimates of about 100 million to 1 billion bird fatalities in the USA, or more recently by Loss et al.'s (2014) estimate of 365-988 million bird fatalities in the USA or Calvert et al.'s (2013) and Machtans et al.'s (2013) estimates of 22.4 million and 25 million bird fatalities in Canada, respectively. The proposed project would impose windows in the airspace normally used by birds.

Glass-façades of buildings intercept and kill many birds, but they are differentially hazardous to birds based on spatial extent, contiguity, orientation, and other factors. At Washington State University, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a three-story glass walkway (no fatality adjustments attempted). Prior to marking the windows to warn birds of the collision hazard, the collision rate was 84.7 per year. At that rate, and not attempting to adjust the fatality estimate for the proportion of fatalities not found, 4,574 birds were likely killed over the 54 years since the start of their study, and that's at a relatively small building façade. Accounting for the proportion of fatalities not found, the number of birds killed by this walkway over the last 54 years would have been about 14,270. And this is just for one 3-story, glass-sided walkway between two college campus buildings.

Klem's (1990) estimate was based on speculation that 1 to 10 birds are killed per building per year, and this speculated range was extended to the number of buildings estimated by the US Census Bureau in 1986. Klem's speculation was supported by fatality monitoring at only two houses, one in Illinois and the other in New York. Also, the basis of his fatality rate extension has changed greatly since 1986. Whereas his estimate served the need to alert the public of the possible magnitude of the bird-window collision issue, it was highly uncertain at the time and undoubtedly outdated more than three decades hence. Indeed, by 2010 Klem (2010) characterized the upper end of his estimated range – 1 billion bird fatalities – as conservative. Furthermore, the estimate lumped species together as if all birds are the same and the loss of all birds to windows has the same level of impact.

***Table 1.*** *Occurrence likelihoods of special-status bird species at or near the proposed project site, according to eBird/iNaturalist records (https://eBird.org, https://www.inaturalist.org) and on-site survey findings, where 'Very close' indicates within 1.5 miles of the site, "nearby" indicates within 1.5 and 4 miles, and "in region" indicates within 4 and 30 miles, and 'in range' means the species' geographic range overlaps the site.*

| **Common name** | ***Species name*** | **Status[1]** | **Occurrence records** | **Locations of On-site and Very-close records** |
|---|---|---|---|---|
| San Bruno elfin butterfly | *Callophrys mossii bayensis* | FE | In region | iNat obscured points |
| Monarch | *Danaus plexippus* | FC | On site | Throughout |
| Bay checkerspot butterfly | *Euphydryas editha bayensis* | FT | In region | iNat obscured points |
| Mission blue butterfly | *Icaricia icarioides missionensis* | FE | In region | iNat obscured points |
| Callippe silverspot butterfly | *Speyeria callippe callippe* | FE | In region | iNat obscured points |
| Myrtle's silverspot butterfly | *Speyeria zerene myrtleae* | FE | In region | |
| Crotch's bumble bee | *Bombus crotchii* | CCE | In region | |
| Western bumble bee | *Bombus occidentalis* | CCE | Very close | |
| Longfin smelt | *Spirinchus thaleichthys* | CT | In region | |
| Delta Smelt | *Hypomesus transpacificus* | FT, CE | In region | |
| Tidewater goby | *Eucyclogobius newberryi* | FE, SSC | In region | iNat obscured points |
| California giant salamander | *Dicamptodon ensatus* | SSC | In region | Obscured |
| Foothill yellow-legged frog | *Rana boylii* | FT, CE | In region | |
| California red-legged frog | *Rana draytonii* | FT, SSC | In region | iNat obscured points |
| Green sea turtle | *Chelonia mydas* | FT | In region | |
| Northwestern pond turtle | *Actinemys marmorata* | FC, SSC | On site | West and SW |
| San Francisco garter snake | *Thamnophis sirtalis tetrataenia* | FE, CE, CFP | In region | iNat obscured points |
| Brant | *Branta bernicla* | SSC2 | On site | West and NE, along shores |
| Cackling goose (Aleutian) | *Branta hutchinsii leucopareia* | WL | On site | Generally throughout |
| Redhead | *Aythya americana* | SSC2 | On site | North |
| Harlequin duck | *Histrionicus histrionicus* | SSC2 | Very close | Presidio |
| Barrow's goldeneye | *Bucephala islandica* | SSC | On site | NW |
| Short-tailed albatross | *Phoebastria albatrus* | FE, SSC | In region | |
| Fork-tailed storm petrel | | SSC | Very close | North and west shores |
| Ashy storm-petrel | *Hydrobates homochroa* | BCC, SSC | Very close | Lake Merced |
| Black storm-petrel | *Hydrobates melania* | SSC, BCC | Very close | NW corner of peninsula |
| Western grebe | *Aechmophorus occidentalis* | BCC | On site | Throughout |

| **Common name** | ***Species name*** | **Status[1]** | **Occurrence records** | **Locations of On-site and Very-close records** |
|---|---|---|---|---|
| Clark's grebe | *Aechmophorus clarkii* | BCC | On site | Throughout |
| Western yellow-billed cuckoo | *Coccyzus americanus occidentalis* | FT, CE | In region | |
| Black swift | *Cypseloides niger* | SSC3, BCC | On site | Central |
| Vaux's swift | *Chaetura vauxi* | SSC2 | On site | Throughout |
| Calliope hummingbird | *Selasphorus calliope* | BCC | On site | Central/South |
| Rufous hummingbird | *Selasphorus rufus* | BCC | On site | Throughout |
| Allen's hummingbird | *Selasphorus sasin* | BCC | On site | Throughout |
| Yellow rail | *Coturnicops noveboracensis* | BCC, SSC | In region | |
| Ridgway's rail (San Francisco Bay) | *Rallus obsoletus obsoletus* | FE, CE, CFP | On site | North |
| California black rail | | | In range | |
| Black oystercatcher | *Haematopus bachmani* | BCC | On site | Throughout, mostly shoreines |
| Mountain plover | *Charadrius montanus* | SSC2, BCC | Very close | San Francisco Zoo |
| Snowy plover | *Charadrius nivosus* | BCC | On site | North and west shores, 1 central |
| Western snowy plover | *Charadrius nivosus nivosus* | FT, SSC | Very close | West along shore |
| Long-billed curlew | *Numenius americanus* | WL | On site | Throughout |
| Marbled godwit | *Limosa fedoa* | BCC | On site | Throughout |
| Black turnstone | *Arenaria melanocephala* | BCC | On site | Mostly along north, west shores |
| Red knot (Pacific) | *Calidris canutus* | BCC | On site | West along coast |
| Pectoral sandpiper | *Calidris melanotos* | BCC | Very close | Lake Merced and Presidio |
| Short-billed dowitcher | *Limnodromus griseus* | BCC | On site | West, North, and central |
| Wandering tattler | *Tringa incana* | BCC | On site | North and W, mostly shores |
| Lesser yellowlegs | *Tringa flavipes* | BCC | On site | North /central (Richmond) |
| Willet | *Tringa semipalmata* | BCC | On site | Throughout |
| Marbled murrelet | *Brachyramphus marmoratus* | FT, CE | On site | West and N/central (Richmond) |
| Rhinoceros auklet | *Cerorhinca monocerata* | WL | On site | North and W, along shores |
| Cassin's auklet | *Ptychoramphus aleuticus* | SSC | Very close | North and W of along shores |
| Scripps' murrelet | *Synthliboramphus scrippsi* | CT, BCC | Very close | NW of site along shore |
| Tufted puffin | | | Very close | West along shore |

| **Common name** | ***Species name*** | **Status[1]** | **Occurrence records** | **Locations of On-site and Very-close records** |
|---|---|---|---|---|
| Laughing gull | *Leucophaeus atricilla* | WL | Very close | Presidio, West shore, Lake Merced |
| Franklin's gull | *Leucophaeus pipixcan* | BCC | Very close | West shore, Golden Gate Park, Lake Merced |
| Heermann's gull | *Larus heermanni* | BCC | On site | Throughout |
| Western gull | *Larus occidentalis* | BCC | On site | Throughout |
| California gull | *Larus californicus* | BCC, WL | On site | Throughout |
| California least tern | *Sternula antillarum browni* | FE, CE, CFP | Very close | North and Lake Merced |
| Black tern | *Chlidonias niger* | SSC2, BCC | Very close | Golden Gate Park, North and west aspects |
| Elegant tern | *Thalasseus elegans* | BCC, WL | On site | Throughout |
| Black skimmer | *Rynchops niger* | BCC, SSC3 | On site | North shore |
| Common loon | *Gavia immer* | SSC | On site | Throughout |
| Brandt's cormorant | *Urile penicillatus* | BCC | On site | Throughout, mostly along North and west shores |
| Double-crested cormorant | *Phalacrocorax auritus* | WL | On site | Throughout |
| American white pelican | *Pelacanus erythrorhynchos* | SSC1 | On site | Throughout, mostly North, central |
| Least bittern | *Ixobrychus exilis* | SSC2 | Very close | Golden Gate Park, Lake Merced |
| White-faced ibis | *Plegadis chihi* | WL | On site | West side |
| Turkey vulture | *Cathartes aura* | BOP | On site | Throughout |
| Osprey | *Pandion haliaetus* | WL, BOP | On site | Throughout |
| White-tailed kite | *Elanus luecurus* | CFP, BOP | On site | Throughout |
| Golden eagle | *Aquila chrysaetos* | BGEPA, CFP, BOP, WL | On site | Throughout, mostly central |
| Northern harrier | *Circus cyaneus* | BCC, SSC3, BOP | On site | Throughout |
| Sharp-shinned hawk | *Accipiter striatus* | WL, BOP | On site | Throughout |
| Cooper's hawk | *Accipiter cooperii* | WL, BOP | On site | Throughout |
| American goshawk | *Accipiter atricapillus* | SSC2, BOP | On site | North |

| **Common name** | ***Species name*** | **Status[1]** | **Occurrence records** | **Locations of On-site and Very-close records** |
|---|---|---|---|---|
| Bald eagle | *Haliaeetus leucocephalus* | CE, BGEPA, BOP | On site | Throughout |
| Red-shouldered hawk | *Buteo lineatus* | BOP | On site | Throughout |
| Swainson's hawk | *Buteo swainsoni* | CT, BOP | On site | Throughout |
| Red-tailed hawk | *Buteo jamaicensis* | BOP | On site | Throughout |
| Ferruginous hawk | *Buteo regalis* | WL, BOP | On site | Throughout |
| Rough-legged hawk | *Buteo lagopus* | BOP | On site | Central |
| American barn owl | *Tyto furcata* | BOP | On site | Throughout |
| Northern spotted owl | *Strix occidentalis caurina* | FT, CT, BOP | In range | |
| Western screech-owl | *Megascops kennicotti* | BOP | Very close | Presidio, Golden Gate Park |
| Great horned owl | *Bubo virginianus* | BOP | On site | Throughout |
| Burrowing owl | *Athene cunicularia* | BCC, SSC2, BOP, CCE | On site | Throughout |
| Long-eared owl | *Asio otus* | BCC, SSC3, BOP | In region | |
| Short-eared owl | *Asia flammeus* | BCC, SSC3, BOP | On site | Central |
| Northern saw-whet owl | *Aegolius acadicus* | BOP | On site | North |
| Northern pygmy-owl | *Glaucidium gnoma* | BOP | Very close | Lake Merced |
| Lewis's woodpecker | *Melanerpes lewis* | BCC | On site | North and central |
| Nuttall's woodpecker | *Picoides nuttallii* | BCC | On site | Throughout |
| American kestrel | *Falco sparverius* | BOP | On site | Throughout |
| Merlin | *Falco columbarius* | WL, BOP | On site | Throughout |
| Peregrine falcon | *Falco peregrinus* | BOP | On site | Throughout |
| Prairie falcon | *Falco mexicanus* | WL, BOP | On site | Throughout |
| Olive-sided flycatcher | *Contopus cooperi* | BCC, SSC2 | On site | Throughout |
| Willow flycatcher | *Empidonax trailii* | CE | On site | Throughout |
| Vermilion flycatcher | *Pyrocephalus rubinus* | SSC2 | On site | North /central (Richmond) |
| Least Bell's vireo | *Vireo bellii pusillus* | FE, CE | In region | |
| Loggerhead shrike | *Lanius ludovicianus* | SSC2 | Very close | Presidio, Lake Merced, Golden Gate Park, SE of site |

| **Common name** | ***Species name*** | **Status[1]** | **Occurrence records** | **Locations of On-site and Very-close records** |
|---|---|---|---|---|
| Yellow-billed magpie | *Pica nuttalli* | BCC | On site | Central/South |
| Oak titmouse | *Baeolophus inornatus* | BCC | On site | North and central |
| California horned lark | *Eremophila alpestris actia* | WL | On site | North and central |
| Bank swallow | *Riparia riparia* | CT | On site | Throughout |
| Purple martin | *Progne subis* | SSC2 | On site | Throughout |
| Wrentit | *Chamaea fasciata* | BCC | On site | Throughout |
| California thrasher | *Toxostoma redivivum* | BCC | On site | N and central |
| Cassin's finch | *Haemorhous cassinii* | BCC | On site | N and central |
| Lawrence's goldfinch | *Spinus lawrencei* | BCC | On site | N and central |
| Grasshopper sparrow | *Ammodramus savannarum* | SSC2 | On site | N and central |
| Black-chinned sparrow | *Spizella atrogularis* | BCC | In region | |
| Bell's sparrow | *Amphispiza b. belli* | WL | On site | South |
| Large-billed savannah sparrow | *Passerculus sandwichensis rostratus* | SSC2 | In region | |
| Yellow-breasted chat | *Icteria virens* | SSC3 | On site | Throughout |
| Yellow-headed blackbird | *Xanthocephalus xanthocephalus* | SSC3 | On site | North and central |
| Bullock's oriole | *Icterus bullockii* | BCC | On site | Throughout |
| Tricolored blackbird | *Agelaius tricolor* | CT, BCC, SSC1 | On site | Throughout |
| Lucy's warbler | *Leiothlypis luciae* | SSC3 | On site | SW and North |
| Virginia's warbler | *Leiothlypis virginiae* | WL, BCC | On site | Throughout |
| San Francisco common yellowthroat | *Geothlypis trichas sinuosa* | SSC3, BCC | In range | |
| Prothonotary warbler | *Protonotaria citrea* | BCC | On site | Central and West |
| Prairie warbler | *Setophaga discolor* | BCC | On site | Central |
| Yellow warbler | *Setophaga petechia* | SSC2 | On site | Throughout |
| Hepatic tanager | *Piranga flava* | WL | On site | Central/South |
| Summer tanager | *Piranga rubra* | SSC1 | On site | Throughout |
| Little brown bat | *Myotis lucifugus* | WBWG: M | In region | |
| Yuma myotis | *Myotis yumanensis* | WBWG: LM | Very close | In golden gate park |

| **Common name** | ***Species name*** | **Status[1]** | **Occurrence records** | **Locations of On-site and Very-close records** |
|---|---|---|---|---|
| Long-eared myotis | *Myotis evotis* | WBWG: M | In region | |
| Fringed myotis | *Myotis thysanodes* | WBWG: H | In range | |
| Long-legged myotis | *Myotis volans* | WBWG: H | In range | |
| California myotis | *Myotis californicus* | WBWG:L | Very close | In golden gate park |
| Canyon bat | *Parastrellus hesperus* | WBWG: M | In range | |
| Big brown bat | *Episticus fuscus* | WBWG: L | Very close | In golden gate park |
| Silver-haired bat | *Lasionycteris noctivagans* | WBWG: M | On site | North |
| Hoary bat | *Lasiurus cinereus* | WBWG: M | Very close | In golden gate park |
| Western red bat | *Lasiurus blossevillii* | SSC, WBWG: H | Very close | In golden gate park |
| Townsend's big-eared bat | *Corynorhinus townsendii* | SSC, WBWG: H | In region | |
| Pallid bat | *Antrozous pallidus* | SSC, WBWG: H | In region | |
| Mexican free-tailed bat | *Tadarida brasiliensis* | WBWG: L | Very close | Golden Gate Park |
| San Francisco dusky-footed woodrat | *Neotoma fuscipes annectens* | SSC | In region | |
| Southern sea otter | *nhydra lutris nereis* | FT, CFP, SSC | In region | |
| Salt-marsh harvest mouse | *Reithrodontomys raviventris* | FE, CE, CFP | In region | |
| American badger | *Taxidea taxus* | SSC | Nearby | |

[1] Listed on CDFW's Special Animals List (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406) as FT or FE = federal threatened or endangered; FC = federal candidate for listing; BGEPA = Bald and Golden Eagle Protection Act; CT or CE = California threatened or endangered; CCT or CCE = Candidate California threatened or endangered; CFP = California Fully Protected (California Fish and Game Code 3511); SSC = California Species of Special Concern, and SSC1, SSC2 and SSC3 = California Bird Species of Special Concern priorities 1, 2 and 3, respectively); WL = CDFW's Taxa to Watch List; WBWG = Western Bat Working Group with priority rankings, of low (L), moderate (M), and high (H); BCC = U.S. Fish and Wildlife Service's Bird of Conservation Concern (https://www.fws.gov/sites/default/files/documents/birds-of-conservation-concern-2021.pdf); and BOP = protected by Birds of Prey (California Fish and Game Code 3503.5, see https://wildlife.ca.gov/Conservation/Birds/Raptors).

By the time Loss et al. (2014) performed their effort to estimate annual USA bird-window fatalities, many more fatality monitoring studies had been reported or were underway. Loss et al. (2014) incorporated many more fatality rates based on scientific monitoring, and they were more careful about which fatality rates to include. However, they included estimates based on fatality monitoring by homeowners, which in one study were found to detect only 38% of the available window fatalities (Bracey et al. 2016). Loss et al. (2014) excluded all fatality records lacking a dead bird in hand, such as injured birds or feather or blood spots on windows. Loss et al.'s (2014) fatality metric was the number of fatalities per building (where in this context a building can include a house, low-rise, or high-rise structure), but they assumed that this metric was based on window collisions. Because most of the bird-window collision studies were limited to migration seasons, Loss et al. (2014) developed an admittedly assumption-laden correction factor for making annual estimates. Also, only 2 of the studies included adjustments for carcass persistence and searcher detection error, and it was unclear how and to what degree fatality rates were adjusted for these factors. Although Loss et al. (2014) attempted to account for some biases as well as for large sources of uncertainty mostly resulting from an opportunistic rather than systematic sampling data source, their estimated annual fatality rate across the USA was highly uncertain and vulnerable to multiple biases, most of which would have resulted in fatality estimates biased low.

In my review of bird-window collision monitoring, I found that the search radius around homes and buildings was very narrow, usually 2 meters. Based on my experience with bird collisions in other contexts, I would expect that a large portion of bird-window collision victims would end up farther than 2 m from the windows, especially when the windows are higher up on tall buildings. In my experience, searcher detection rates tend to be low for small birds deposited on ground with vegetation cover or woodchips or other types of organic matter. Also, vertebrate scavengers entrain on anthropogenic sources of mortality and quickly remove many of the carcasses, thereby preventing the fatality searcher from detecting these fatalities. Adjusting fatality rates for these factors – search radius bias, searcher detection error, and carcass persistence rates – would greatly increase nationwide estimates of bird-window collision fatalities.

Buildings can intercept many nocturnal migrants as well as birds flying in daylight. As mentioned above, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a four-story glass walkway at Washington State University (no adjustments attempted for undetected fatalities). Somerlot (2003) found 21 bird fatalities among 13 buildings on a university campus within only 61 days. Monitoring twice per week, Hager at al. (2008) found 215 bird fatalities of 48 species, or 55 birds/building/year, and at another site they found 142 bird fatalities of 37 species for 24 birds/building/year. Gelb and Delacretaz (2009) recorded 5,400 bird fatalities under buildings in New York City, based on a decade of monitoring only during migration periods, and some of the high-rises were associated with hundreds of fatalities each. Klem et al. (2009) monitored 73 building façades in New York City during 114 days of two migratory periods, tallying 549 collision victims, nearly 5 birds per day. Borden et al. (2010) surveyed a 1.8 km route 3 times per week during 12-month period and found 271 bird fatalities of 50 species. Parkins et al. (2015) found 35 bird fatalities of 16 species within only 45 days of monitoring under 4 building façades. From

24 days of survey over a 48-day span, Porter and Huang (2015) found 47 fatalities under 8 buildings on a university campus. Sabo et al. (2016) found 27 bird fatalities over 61 days of searches under 31 windows. In San Francisco, Kahle et al. (2016) found 355 collision victims within 1,762 days under a 5-story building. Ocampo-Peñuela et al. (2016) searched the perimeters of 6 buildings on a university campus, finding 86 fatalities after 63 days of surveys. One of these buildings produced 61 of the 86 fatalities, and another building with collision-deterrent glass caused only 2 of the fatalities, thereby indicating a wide range in impacts likely influenced by various factors. There is ample evidence available to support my prediction that the proposed project would result in many collision fatalities of birds.

Project Impact Prediction

By the time of these comments, I had reviewed and processed results of bird collision monitoring at 213 buildings and façades for which bird collisions per $m^2$ of glass per year could be calculated and averaged (Johnson and Hudson 1976, O'Connell 2001, Somerlot 2003, Hager et al. 2008, Borden et al. 2010, Hager et al. 2013, Porter and Huang 2015, Parkins et al. 2015, Kahle et al. 2016, Ocampo-Peñuela et al. 2016, Sabo et al. 2016, Barton et al. 2017, Gomez-Moreno et al. 2018, Schneider et al. 2018, Loss et al. 2019, Brown et al. 2020, City of Portland Bureau of Environmental Services and Portland Audubon 2020, Riding et al. 2020). These study results averaged 0.073 bird deaths per $m^2$ of glass per year (95% CI: 0.042-0.102). This average and its 95% confidence interval provide a robust basis for predicting fatality rates at a proposed new project.

The Addendum includes an increase of 4,000 residential units. The floorspace per residential unit of condominiums, townhouses and apartments among the projects I have reviewed as an expert have averaged 1,296.3 square feet per unit. The average square footage of the apartments that contributed to this average was consistent with the floorspace reported in the Addendum as an example 590-foot-tall apartment building in the project, which itself would average 949 sf per unit with 60,700 sf of retail space. I estimate the total square footage of 4,000 residential units would be 5,185,251 sf.

Among the 45 residential projects I have reviewed as an expert and for which I was able to measure the extent of structural glass on proposed building facades depicted in renderings provided in the environmental review documents, I measured an average 0.01872 (95% confidence interval: 0.00989–0.02754) $m^2$ per square foot of floorspace. This rate multiplied by the total square footage of 4,000 additional residential units would predict 97,060 (95% CI: 51,300–142,821) $m^2$ of additional structural glass on the facades of new buildings in the City. The mean window area multiplied against the mean collision mortality measured across North America predicts 7,095 (aggregate[1] 95% CI: 2,226–14,82) bird fatalities per year. More than seven thousand additional fatalities per

[1] What I mean by aggregate CI is that the lower bound estimate of the window area is multiplied by the lower bound estimate of collision mortality, and the upper bound estimate of the window area is multiplied by the upper bound estimate of collision mortality.

year above the level that would be expected under the 2022 plan would be a substantial number, and it should easily qualify as a highly significant impact.

Nearly all predicted deaths would be of birds protected under the Migratory Bird Treaty Act and under the California Migratory Bird Protection Act, thus causing significant impacts. Given the predicted level of bird-window collision mortality, it is my opinion that the proposed project would result in potentially significant adverse biological impacts, including the unmitigated take of aerial habitats of birds, bats and other volant wildlife. Not only would the project take habitat of rare and sensitive species of birds, but it would transform the building's airspace into a lethal collision trap to birds.

**SPATIAL DISTRIBUTION OF PREDICTED AVIAN COLLISION MORTALITY**

San Francisco is situated within the Pacific Flyway, which is one of the most intensely used bird migration pathways in the world. It is also known that birds migrate along the coast and across Hawk Hill and the Marin Headlands, many headed to or from the Altamont Pass where I spent thousands of hours observing migrants during both day and night over about 20 years. Between Hawk Hill and the Altamont Pass is San Francisco, which must be visited by many thousands of migrating birds. Knowing which species of birds and how many birds move across San Francisco, and knowing specific flight paths that are disproportionately used by season would be useful for predicting where increases in building heights would pose greater risks to birds. Unfortunately, the data on bird movement through San Francisco are sparse.

There *are* data on bird species richness. Golden Gate Audubon Society ("GGAS") (2020), tallied 47 species of birds on Mount Sutro Open Space Reserve in about 54 hours of surveys between 16 March and 29 December 2019. On the same Reserve on 20 August 2020, I detected 23 species of birds over a much shorter time, but a model I fit to my data predicts that I would have detected the same number of bird species as GGAS (2020) had I surveyed for 11 hours and 40 minutes, and that I would have detected 117 species of birds had I surveyed for 54 hours (Figure 1).

I repeated my survey on Mount Sutro Open Space Reserve on 16 July 2021, and I implemented the same survey methods such as start time, duration, and survey route. The second survey yielded even more species detections and at a faster rate (red circles in Figure 2). Between both surveys I detected 37 species of birds, but adding the results of GGAS (2021) brings the total number of bird species to 71. With additional surveys, this number would surely increase. The evidence is that many birds find and use aerohabitat in San Francisco.

Kahle et al. (2016) detected 40 species of birds at the California Academy of Sciences building in Golden Gatee Park (Table 2). More importantly, members of 34 (85%) of these species were also recorded as window collision fatalities, and members of 37 (93%) of these species appear in the scientific literature as window collision fatalities. Killed disproportionately relative to their observed abundances were special-status species such as Allen's hummingbird and yellow warbler (Figure 3). Both these species are found in abundance in San Francisco (Photo 1).

***Figure 1.*** *Cumulative number of bird species detected as a power function of the number of minutes devoted to the survey. The model explained 98% of the variation, with a root mean square error of 17.71. Had I been able to commit more time to the survey, I am confident a different model would have better fit the resulting data – a model more expressive of an asymptote.*

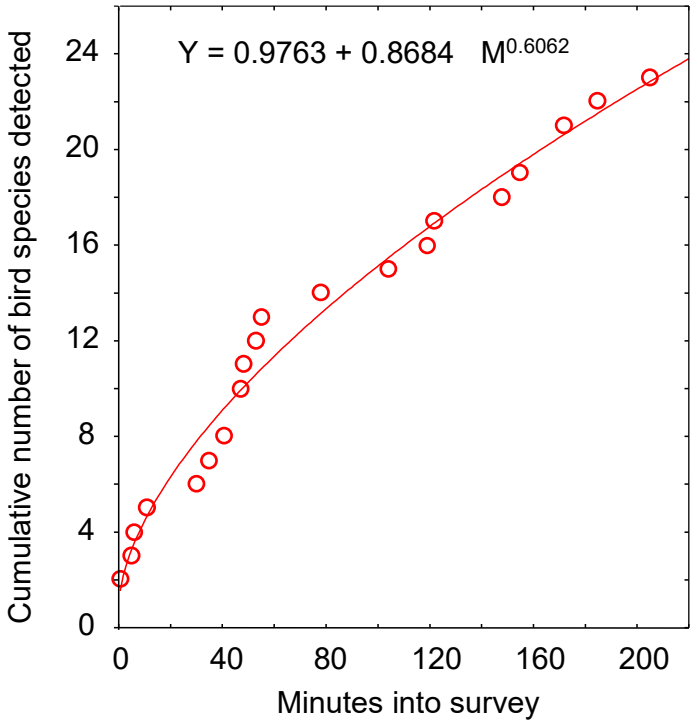



***Figure 2.*** *Actual and predicted relationships between the number of vertebrate wildlife species (all but 2 were birds) detected and the elapsed survey time based on my visual-scan surveys on 20 August 2020 and 16 July 2021.*

$$Y_{2020} = \frac{1}{0.001559 + 0.935847(X+1)^{-0.580731}}$$

$$Y_{2021} = \frac{1}{0.0016586 + 0.459981(X+1)^{-0.543857}}$$

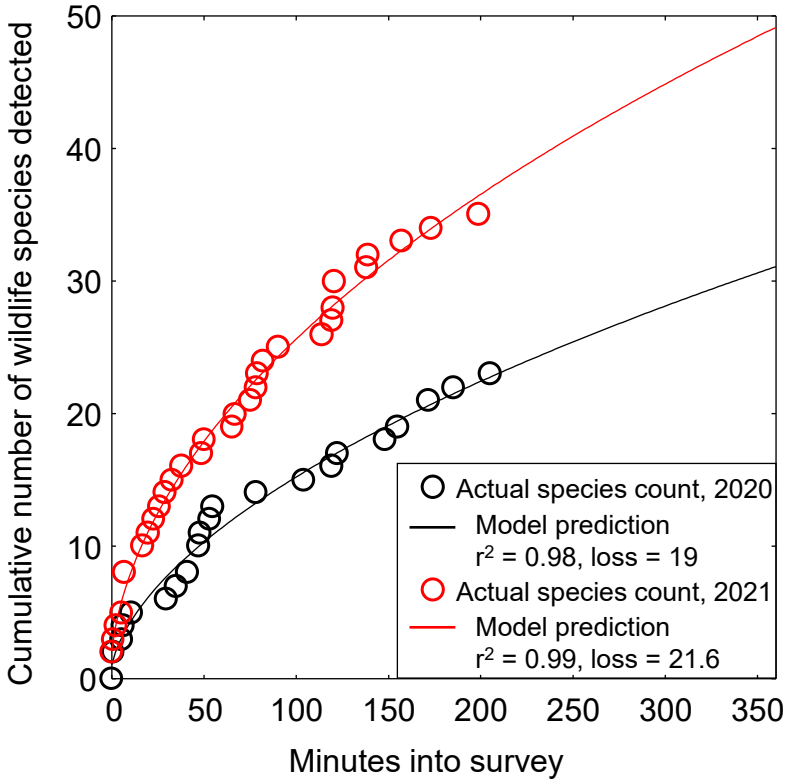


***Table 2.*** *Species observed on site or reported as window-collision victims at the California Academy of Sciences (CAS) buildings (Kahle et al. 2016).*

| Species | Scientific name | Status[1] | Number counted at CAS study | | Known window deaths in North America |
|---|---|---|---|---|---|
| | | | As window deaths | Alive in survey plots | |
| Western gull | *Larus occidentalis* | BCC | | 4 | |
| Red-tailed hawk | *Buteo jamaicensis* | BOP | | 1 | Yes |
| Red-shouldered hawk | *Buteo lineatus* | BOP | | 1 | Yes |
| Mourning dove | *Zenaida macroura* | | 6 | 3 | Yes |
| Great-horned owl | *Bubo virginianus* | BOP | | 1 | Yes |
| Anna's hummingbird | *Calypte anna* | | 131 | 256 | Yes |
| Allen's hummingbird | *Selasphorus sasin* | BCC | 37 | 29 | Yes |
| Costa's hummingbird | *Calypte costae* | BCC | 1 | 0 | Yes |
| Rufous hummingbird | *Selasphorus rufus* | BCC | 4 | 0 | Yes |
| Nuttall's woodpecker | *Picoides nuttallii* | BCC | | 13 | |
| Pacific-slope flycatcher | *Empidonax difficilis* | | 1 | 5 | Yes |
| Black phoebe | *Sayornis nigricans* | | 3 | 34 | Yes |
| Chestnut-backed chickadee | *Poecile rufescens* | | 1 | 203 | Yes |
| Bushtit | *Psaltriparus minimus* | | 1 | 399 | Yes |
| Brown creeper | *Certhia americana* | | 1 | 52 | Yes |
| Pygmy nuthatch | *Sitta pygmaea* | | 1 | 242 | Yes |
| Swainson's thrush | *Catharus ustulatus* | | 1 | 1 | Yes |
| Hermit thrush | *Catharus guttatus* | | 8 | 82 | Yes |
| American robin | *Turdus vulvaris* | | 3 | 389 | Yes |
| Warbling vireo | *Vireo gilvus* | | 1 | 5 | Yes |
| Yellow-rumped warbler | *Setophaga coronata* | | 7 | 92 | Yes |
| Orange-crowned warbler | *Oreothlypis celata* | | 2 | 29 | Yes |
| Townsend's warbler | *Setophaga townsendi* | | 3 | 101 | Yes |
| Wilson's warbler | *Cardellina pusilla* | | 3 | 11 | Yes |
| Yellow warbler | *Setophaga petechia* | SSC2, BCC | 7 | 18 | Yes |
| San Francisco common yellowthroat | *Geothlypis trichas sinuosa* | SSC3, BCC | 3 | 0 | Yes |
| Song sparrow | *Melospiza melodia* | | 5 | 435 | Yes |
| Golden-crowned sparrow | *Zonotrichia atricapilla* | | 3 | 230 | Yes |
| White-crowned sparrow | *Zonotrichia leucophrys* | | 1 | 249 | Yes |
| Savannah sparrow | *Passerculus sandwichensis* | | 2 | 0 | Yes |
| Lincoln's sparrow | *Melospiza lincolnii* | | 3 | 35 | Yes |
| Fox sparrow | *Passerella iliaca* | | 6 | 152 | Yes |

| Species | Scientific name | Status[1] | Number counted at CAS study | | Known window deaths in North America |
|---|---|---|---|---|---|
| | | | As window deaths | Alive in survey plots | |
| Dark-eyed junco | *Junco hyemalis* | | 22 | 510 | Yes |
| California towhee | *Melozone crissalis* | | 1 | 92 | Yes |
| Brown-headed cowbird | *Molothrus ater* | | 1 | 39 | Yes |
| Red-winged blackbird | *Agelaius phoeniceus* | | 1 | 261 | Yes |
| Brewer's blackbird | *Euphagus cyanocephalus* | | 25 | 1027 | Yes |
| Tricolored blackbird | *Agelaius tricolor* | CT, BCC | | 15 | |
| House finch | *Haemorhous mexicanus* | | 5 | 213 | Yes |
| Lesser goldfinch | *Spinus psaltria* | | 1 | 44 | Yes |

[1] Listed as BCC = U.S. Fish and Wildlife Service Bird Species of Conservation Concern, CT = California threatened, BOP = California Fish and Game Code 3503.5 (Birds of Prey), and SSC1, SSC2 and SSC3 = California Bird Species of Special Concern priorities 1, 2 and 3, respectively.

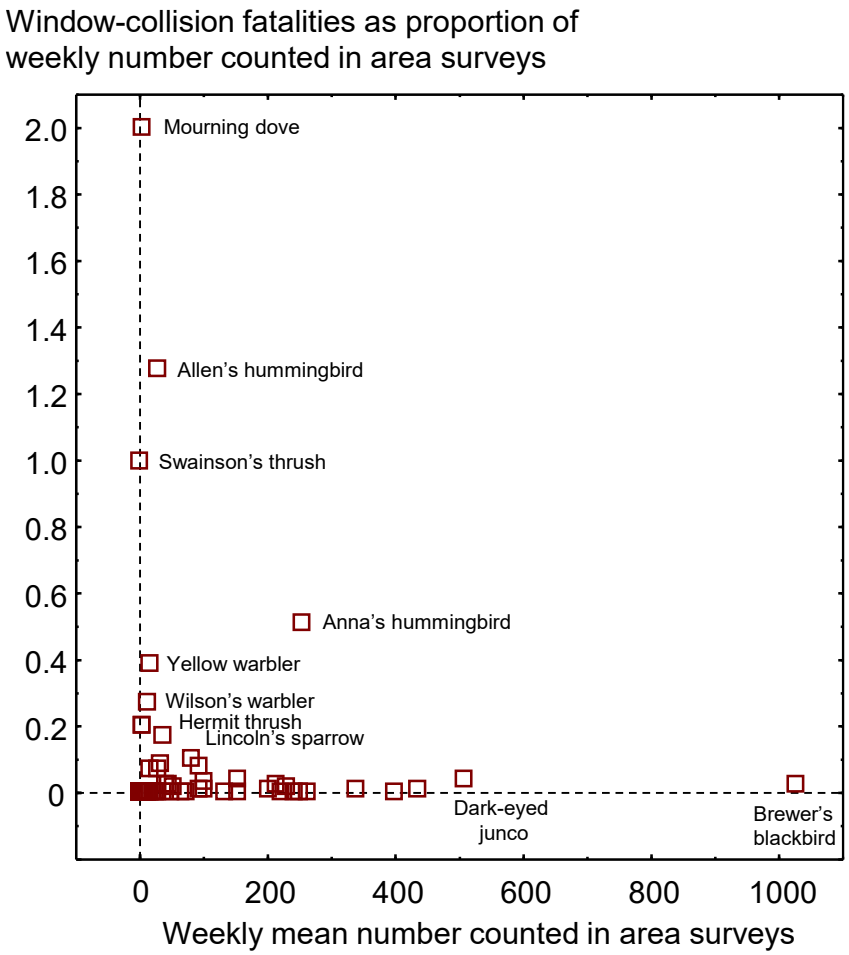



***Figure 3.*** *Window collision fatalities as a proportion of those observed in visual-scan surveys at the California Academy of Sciences building (data from Kahle et al. 2016).*




***Photo 1.*** *Allen's hummingbird in Mount Sutro Open Space Reserve, 16 July 2021. As found at the nearby California Academy of Sciences Building, this species is highly vulnerable to window collision mortality (Kahle et al. 2016).*

What is needed is a study of bird movement through San Francisco. Needed are data on species occurrences, numbers of birds, heights above ground, flight direction, specific behaviors and timing of flights across the City. These same types of data were collected in the nearby Altamont Pass Wind Resource Area to acquire an understanding of bird flight traffic for the purposed of guiding the sitings of new wind turbines as part of repowering (Smallwood 2017, Smallwood et al. 2017). The data could be acquired by performing periodic surveys from stations established systematically or randomly across the City, covering all times of day and night (using thermal imaging cameras) and lasting at least one year to characterize seasonality of bird movement. Based on such data, the City could more carefully plan the vertical and lateral outlay of new buildings to minimize the encounter frequencies of birds with buildings. This is important because the existing Bird-Safe Building Guidelines can accomplish only so much, and the efficacy of these Guidelines remains unmeasured and unknown. Therefore, what is also needed is a program to measure the efficacy of the Guidelines by designing an experiment to search for and count bird-window collision victims along with the implementation of carcass detection trials. The San Francisco guidelines should have also covered scientific monitoring of impacts as well as compensatory mitigation for impacts that could not be avoided, minimized or reduced. Until these types of bird movement data are in hand, the City can only speculate as to the magnitude of bird-window collision mortality and whether the mortality can be minimized or reduced via Bird-Safe Building Guidelines.

In the face of such a large increase in the number of residential units, as well as a major shift in the lateral and vertical layout of 54,000 residential units, another need is for an update in the Bird-Safe Building Guidelines (San Francisco Planning Department 2011). Much has been learned about causal factors and mitigation solutions (e.g., Sheppard and Phillips 2015). The American Bird Conservancy (ABC) produced an excellent set of

guidelines recommending actions to: (1) Minimize use of glass; (2) Placing glass behind some type of screening (grilles, shutters, exterior shades); (3) Using glass with inherent properties to reduce collisions, such as patterns, window films, decals or tape; and (4) Turning off lights during migration seasons (Sheppard and Phillips 2015).

New research results inform of the efficacy of marking windows. Whereas Klem (1990) found no deterrent effect from decals on windows, Johnson and Hudson (1976) reported a fatality reduction of about 69% after placing decals on windows. In an experiment of opportunity, Ocampo-Peñuela et al. (2016) found only 2 of 86 fatalities at one of 6 buildings – the only building with windows treated with a bird deterrent film. At the building with fritted glass, bird collisions were 82% lower than at other buildings with untreated windows. Kahle et al. (2016) added external window shades to some windowed façades to reduce fatalities 82% and 95%. Brown et al. (2020) reported an 84% lower collision probability among fritted glass windows and windows treated with ORNILUX R UV. City of Portland Bureau of Environmental Services and Portland Audubon (2020) reduced bird collision fatalities 94% by affixing marked Solyx window film to existing glass panels of Portland's Columbia Building. Many external and internal glass markers have been tested experimentally, some showing no effect and some showing strong deterrent effects (Klem 1989, 1990, 2009, 2011; Klem and Saenger 2013; Rössler et al. 2015).

Van Doren et al. (2021) found that nocturnal migrants contributed most of the collision fatalities in their study, and the largest predictors of fatalities were peak migration and lit windows. Van Doren et al. (2021) predicted that a light-out mitigation measure could reduce bird-window collision mortality by 60%.

Monitoring and the use of compensatory mitigation should be incorporated at any new building project because the measures recommended in the available guidelines remain of uncertain efficacy, and even if these measures are effective, they will not reduce collision fatalities to zero. The only way to assess mitigation efficacy and to quantify post-construction fatalities is to monitor the project for fatalities.

The Addendum (p. 49) concludes, "In summary, the proposed rezoning program would not result in new significant biological resources impacts that were not previously identified in the FEIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures or changes to existing mitigation measures are required." However, the FEIR did not identify the loss of aerohabitat of birds and bats as any sort of project impact, and neither does the Addendum. Furthermore, the FEIR did not identify as an impact my predicted mean mortality of 7,095 birds per year just from the additional 4,000 residential units, and an upper bound CI prediction of 14,082 birds per year.

Thank you for your consideration,



Shawn Smallwood, Ph.D.

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# Kenneth Shawn Smallwood
# Curriculum Vitae

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Born May 3, 1963 in
Sacramento, California.
Married, father of two.

## Ecologist

### Expertise

- Finding solutions to controversial problems related to wildlife interactions with human industry, infrastructure, and activities;
- Wildlife monitoring and field study using GPS, thermal imaging, behavior surveys;
- Using systems analysis and experimental design principles to identify meaningful ecological patterns that inform management decisions.

### Education

Ph.D. Ecology, University of California, Davis. September 1990.
M.S. Ecology, University of California, Davis. June 1987.
B.S. Anthropology, University of California, Davis. June 1985.
Corcoran High School, Corcoran, California. June 1981.

### Experience

- 762 professional reports, including:
- 90 peer reviewed publications
- 24 in non-reviewed proceedings
- 646 reports, declarations, posters and book reviews
- 8 in mass media outlets
- 92 public presentations of research results

Editing for scientific journals: Guest Editor, *Wildlife Society Bulletin*, 2012-2013, of invited papers representing international views on the impacts of wind energy on wildlife and how to mitigate the impacts. Associate Editor, *Journal of Wildlife Management*, March 2004 to 30 June 2007. Editorial Board Member, *Environmental Management*, 10/1999 to 8/2004. Associate Editor, *Biological Conservation*, 9/1994 to 9/1995.

Member, Alameda County Scientific Review Committee (SRC), August 2006 to April 2011. The five-member committee investigated causes of bird and bat collisions in the Altamont Pass Wind Resource Area, and recommended mitigation and monitoring measures. The SRC reviewed the science underlying the Alameda County Avian Protection Program, and advised

the County on how to reduce wildlife fatalities.

Consulting Ecologist, 2004-2007, California Energy Commission (CEC). Provided consulting services as needed to the CEC on renewable energy impacts, monitoring and research, and produced several reports. Also collaborated with Lawrence-Livermore National Lab on research to understand and reduce wind turbine impacts on wildlife.

Consulting Ecologist, 1999-2013, U.S. Navy. Performed endangered species surveys, hazardous waste site monitoring, and habitat restoration for the endangered San Joaquin kangaroo rat, California tiger salamander, California red-legged frog, California clapper rail, western burrowing owl, salt marsh harvest mouse, and other species at Naval Air Station Lemoore; Naval Weapons Station, Seal Beach, Detachment Concord; Naval Security Group Activity, Skaggs Island; National Radio Transmitter Facility, Dixon; and, Naval Outlying Landing Field Imperial Beach.

Part-time Lecturer, 1998-2005, California State University, Sacramento. Instructed Mammalogy, Behavioral Ecology, and Ornithology Lab, Contemporary Environmental Issues, Natural Resources Conservation.

Senior Ecologist, 1999-2005, BioResource Consultants. Designed and implemented research and monitoring studies related to avian fatalities at wind turbines, avian electrocutions on electric distribution poles across California, and avian fatalities at transmission lines.

Chairman, Conservation Affairs Committee, The Wildlife Society--Western Section, 1999-2001. Prepared position statements and led efforts directed toward conservation issues, including travel to Washington, D.C. to lobby Congress for more wildlife conservation funding.

Systems Ecologist, 1995-2000, Institute for Sustainable Development. Headed ISD's program on integrated resources management. Developed indicators of ecological integrity for large areas, using remotely sensed data, local community involvement and GIS.

Associate, 1997-1998, Department of Agronomy and Range Science, University of California, Davis. Worked with Shu Geng and Mingua Zhang on several studies related to wildlife interactions with agriculture and patterns of fertilizer and pesticide residues in groundwater across a large landscape.

Lead Scientist, 1996-1999, National Endangered Species Network. Informed academic scientists and environmental activists about emerging issues regarding the Endangered Species Act and other environmental laws. Testified at public hearings on endangered species issues.

Ecologist, 1997-1998, Western Foundation of Vertebrate Zoology. Conducted field research to determine the impact of past mercury mining on the status of California red-legged frogs in Santa Clara County, California.

Senior Systems Ecologist, 1994-1995, EIP Associates, Sacramento, California. Provided consulting services in environmental planning, and quantitative assessment of land units for their conservation and restoration opportunities basedon ecological resource requirements of 29 special-status species. Developed ecological indicators for prioritizing areas within Yolo County

to receive mitigation funds for habitat easements and restoration.

Post-Graduate Researcher, 1990-1994, Department of Agronomy and Range Science*, U.C. Davis*. Under Dr. Shu Geng's mentorship, studied landscape and management effects on temporal and spatial patterns of abundance among pocket gophers and species of Falconiformes and Carnivora in the Sacramento Valley. Managed and analyzed a data base of energy use in California agriculture. Assisted with landscape (GIS) study of groundwater contamination across Tulare County, California.

Work experience in graduate school: Co-taught Conservation Biology with Dr. Christine Schonewald, 1991 & 1993, UC Davis Graduate Group in Ecology; Reader for Dr. Richard Coss's course on Psychobiology in 1990, UC Davis Department of Psychology; Research Assistant to Dr. Walter E. Howard, 1988-1990, UC Davis Department of Wildlife and Fisheries Biology, testing durable baits for pocket gopher management in forest clearcuts; Research Assistant to Dr. Terrell P. Salmon, 1987-1988, UC Wildlife Extension, Department of Wildlife and Fisheries Biology, developing empirical models of mammal and bird invasions in North America, and a rating system for priority research and control of exotic species based on economic, environmental and human health hazards in California. Student Assistant to Dr. E. Lee Fitzhugh, 1985-1987, UC Cooperative Extension, Department of Wildlife and Fisheries Biology, developing and implementing statewide mountain lion track count for long-term monitoring.

Fulbright Research Fellow, Indonesia, 1988. Tested use of new sampling methods for numerical monitoring of Sumatran tiger and six other species of endemic felids, and evaluated methods used by other researchers.

**Projects**

Repowering wind energy projects through careful siting of new wind turbines using map-based collision hazard models to minimize impacts to volant wildlife. Funded by wind companies (principally NextEra Renewable Energy, Inc.), California Energy Commission and East Bay Regional Park District, I have collaborated with a GIS analyst and managed a crew of five field biologists performing golden eagle behavior surveys and nocturnal surveys on bats and owls. The goal is to quantify flight patterns for development of predictive models to more carefully site new wind turbines in repowering projects. Focused behavior surveys began May 2012 and continue. Collision hazard models have been prepared for seven wind projects, three of which were built. Planning for additional repowering projects is underway.

Test avian safety of new mixer-ejector wind turbine (MEWT). Designed and implemented a before-after, control-impact experimental design to test the avian safety of a new, shrouded wind turbine developed by Ogin Inc. (formerly known as FloDesign Wind Turbine Corporation). Supported by a $718,000 grant from the California Energy Commission's Public Interest Energy Research program and a 20% match share contribution from Ogin, I managed a crew of seven field biologists who performed periodic fatality searches and behavior surveys, carcass detection trials, nocturnal behavior surveys using a thermal camera, and spatial analyses with the collaboration of a GIS analyst. Field work began 1 April 2012 and ended 30 March 2015 without Ogin installing its MEWTs, but we still achieved multiple important scientific advances.

Reduce avian mortality due to wind turbines at Altamont Pass. Studied wildlife impacts caused by 5,400 wind turbines at the world's most notorious wind resource area. Studied how impacts are perceived by monitoring and how they are affected by terrain, wind patterns, food resources, range management practices, wind turbine operations, seasonal patterns, population cycles, infrastructure management such as electric distribution, animal behavior and social interactions.

Reduce avian mortality on electric distribution poles. Directed research toward reducing bird electrocutions on electric distribution poles, 2000-2007. Oversaw 5 founds of fatality searches at 10,000 poles from Orange County to Glenn County, California, and produced two large reports.

Cook *et al*. v. Rockwell International *et al*., No. 90-K-181 (D. Colorado). Provided expert testimony on the role of burrowing animals in affecting the fate of buried and surface-deposited radioactive and hazardous chemical wastes at the Rocky Flats Plant, Colorado. Provided expert reports based on four site visits and an extensive document review of burrowing animals. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals. I testified in federal court in November 2005, and my clients were subsequently awarded a $553,000,000 judgment by a jury. After appeals the award was increased to two billion dollars.

Hanford Nuclear Reservation Litigation. Provided expert testimony on the role of burrowing animals in affecting the fate of buried radioactive wastes at the Hanford Nuclear Reservation, Washington. Provided three expert reports based on three site visits and extensive document review. Predicted and verified a certain population density of pocket gophers on buried waste structures, as well as incidence of radionuclide contamination in body tissue. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals.

Expert testimony and declarations on proposed residential and commercial developments, gas-fired power plants, wind, solar and geothermal projects, water transfers and water transfer delivery systems, endangered species recovery plans, Habitat Conservation Plans and Natural Communities Conservation Programs. Testified before multiple government agencies, Tribunals, Boards of Supervisors and City Councils, and participated with press conferences and depositions. Prepared expert witness reports and court declarations, which are summarized under Reports (below).

Protocol-level surveys for special-status species. Used California Department of Fish and Wildlife and US Fish and Wildlife Service protocols to search for California red-legged frog, California tiger salamander, arroyo southwestern toad, blunt-nosed leopard lizard, western pond turtle, giant kangaroo rat, San Joaquin kangaroo rat, San Joaquin kit fox, western burrowing owl, Swainson's hawk, Valley elderberry longhorn beetle and other special-status species.

Conservation of San Joaquin kangaroo rat. Performed research to identify factors responsible for the decline of this endangered species at Lemoore Naval Air Station, 2000-2013, and implemented habitat enhancements designed to reverse the trend and expand the population.

Impact of West Nile Virus on yellow-billed magpies. Funded by Sacramento-Yolo Mosquito and Vector Control District, 2005-2008, compared survey results pre- and post-West Nile Virus epidemic for multiple bird species in the Sacramento Valley, particularly on yellow-billed magpie and American crow due to susceptibility to WNV.

Workshops on HCPs. Assisted Dr. Michael Morrison with organizing and conducting a 2-day workshop on Habitat Conservation Plans, sponsored by Southern California Edison, and another 1-day workshop sponsored by PG&E. These Workshops were attended by academics, attorneys, and consultants with HCP experience. We guest-edited a Proceedings published in Environmental Management.

Mapping of biological resources along Highways 101, 46 and 41. Used GPS and GIS to delineate vegetation complexes and locations of special-status species along 26 miles of highway in San Luis Obispo County, 14 miles of highway and roadway in Monterey County, and in a large area north of Fresno, including within reclaimed gravel mining pits.

GPS mapping and monitoring at restoration sites and at Caltrans mitigation sites. Monitored the success of elderberry shrubs at one location, the success of willows at another location, and the response of wildlife to the succession of vegetation at both sites. Also used GPS to monitor the response of fossorial animals to yellow star-thistle eradication and natural grassland restoration efforts at Bear Valley in Colusa County and at the decommissioned Mather Air Force Base in Sacramento County.

Mercury effects on Red-legged Frog. Assisted Dr. Michael Morrison and US Fish and Wildlife Service in assessing the possible impacts of historical mercury mining on the federally listed California red-legged frog in Santa Clara County. Also measured habitat variables in streams.

Opposition to proposed No Surprises rule. Wrote a white paper and summary letter explaining scientific grounds for opposing the incidental take permit (ITP) rules providing ITP applicants and holders with general assurances they will be free of compliance with the Endangered Species Act once they adhere to the terms of a "properly functioning HCP." Submitted 188 signatures of scientists and environmental professionals concerned about No Surprises rule US Fish and Wildlife Service, National Marine Fisheries Service, all US Senators.

Natomas Basin Habitat Conservation Plan alternative. Designed narrow channel marsh to increase the likelihood of survival and recovery in the wild of giant garter snake, Swainson's hawk and Valley Elderberry Longhorn Beetle. The design included replication and interspersion of treatments for experimental testing of critical habitat elements. I provided a report to Northern Territories, Inc.

Assessments of agricultural production system and environmental technology transfer to China. Twice visited China and interviewed scientists, industrialists, agriculturalists, and the Directors of the Chinese Environmental Protection Agency and the Department of Agriculture to assess the need and possible pathways for environmental clean-up technologies and trade opportunities between the US and China.

Yolo County Habitat Conservation Plan. Conducted landscape ecology study of Yolo County to spatially prioritize allocation of mitigation efforts to improve ecosystem functionality within the County from the perspective of 29 special-status species of wildlife and plants. Used a hierarchically structured indicators approach to apply principles of landscape and ecosystem ecology, conservation biology, and local values in rating land units. Derived GIS maps to help guide the conservation area design, and then developed implementation strategies.

Mountain lion track count. Developed and conducted a carnivore monitoring program throughout California since 1985. Species counted include mountain lion, bobcat, black bear, coyote, red and gray fox, raccoon, striped skunk, badger, and black-tailed deer. Vegetation and land use are also monitored. Track survey transect was established on dusty, dirt roads within randomly selected quadrats.

Sumatran tiger and other felids. Upon award of Fulbright Research Fellowship, I designed and initiated track counts for seven species of wild cats in Sumatra, including Sumatran tiger, fishing cat, and golden cat. Spent four months on Sumatra and Java in 1988, and learned Bahasa Indonesia, the official Indonesian language.

Wildlife in agriculture. Beginning as post-graduate research, I studied pocket gophers and other wildlife in 40 alfalfa fields throughout the Sacramento Valley, and I surveyed for wildlife along a 200 mile road transect since 1989 with a hiatus of 1996-2004. The data are analyzed using GIS and methods from landscape ecology, and the results published and presented orally to farming groups in California and elsewhere. I also conducted the first study of wildlife in cover crops used on vineyards and orchards.

Agricultural energy use and Tulare County groundwater study. Developed and analyzed a data base of energy use in California agriculture, and collaborated on a landscape (GIS) study of groundwater contamination across Tulare County, California.

Pocket gopher damage in forest clear-cuts. Developed gopher sampling methods and tested various poison baits and baiting regimes in the largest-ever field study of pocket gopher management in forest plantations, involving 68 research plots in 55 clear-cuts among 6 National Forests in northern California.

Risk assessment of exotic species in North America. Developed empirical models of mammal and bird species invasions in North America, as well as a rating system for assigning priority research and control to exotic species in California, based on economic, environmental, and human health hazards.

**Peer Reviewed Publications**

Smallwood, K. S. 2022. Utility-scale solar impacts to volant wildlife. Journal of Wildlife Management: e22216. https://doi.org/10.1002/jwmg.22216

Smallwood, K. S., and N. L. Smallwood. 2021. Breeding Density and Collision Mortality of Loggerhead Shrike (*Lanius ludovicianus*) in the Altamont Pass Wind Resource Area. Diversity 13, 540. https://doi.org/10.3390/d13110540.

Smallwood, K. S. 2020. USA wind energy-caused bat fatalities increase with shorter fatality search intervals. Diversity 12(98); https://doi.org/10.3390/d12030098

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# EXHIBIT D

FASTCAST

Deborah Holley

Cc/ Richard Drurey

December 1, 2025

# PRELIMINARY SHADOW ANALYSIS: **PROPOSED FAMILY ZONING 2025**, JOE DIMAGGIO PLAYGROUND, SAN FRANCISCO

Fastcast is hereby submitting the results of a **programmatic shadow analysis** prepared for the proposed **Family Zoning Plan**. This analysis is intended to quantify the **generalized potential change in shadow on Joe DiMaggio Playground** under a scenario in which the proposed height increases on surrounding parcels are fully utilized.

As part of the methodology, **City building footprint data** was used to define both the **existing zoning height extrusions** and the **Family Zoning Plan height extrusions** using the **same building footprints**. In this area, the **existing zoning envelope** (**generally 40 feet in height**) is treated as an **existing shadow-casting condition**, and the Family Zoning scenario adds only the **incremental height above this existing zoning envelope**. The **proposed shadows are therefore based solely on the height increase introduced by the Family Zoning Plan**, and **net new shadow** on Joe DiMaggio Playground is calculated only for this **incremental zoning height increase**.

The analysis applies **methodologies and data models consistent with San Francisco Planning Department and Planning Code Section 295 (“Shadow Ordinance”) standards and procedures**, as outlined in the July 2014 memorandum *“Shadow Analysis Procedures and Scope Requirements”* and as refined by subsequent written directives issued by the San Francisco Planning Department.

# I. INTRODUCTION

This memorandum documents **preliminary quantitative shadow results** for **Joe DiMaggio Playground** associated with proposed height increases under the **San Francisco Family Zoning Plan** (**FZP**) in the North Beach area.

The purpose is to:

1. Summarize the **Family Zoning Plan objectives**,
2. Describe the **objective of the shadow analysis** for Joe DiMaggio Playground, and
3. Present a **neutral, scientific summary** of the **net new shadow** on the playground and the **times of day/season** when this potential shadow increase overlaps with typical playground activities.

No conclusions are offered regarding policy, compliance, or adequacy; this memo is limited to **description and quantification**.

# II. FAMILY ZONING PLAN – CONTEXT & OBJECTIVES

According to the **Family Zoning Plan "Five Fast Facts"** document:

- The Plan is intended to create capacity for **over 36,000 homes** on San Francisco's north and west sides.
- In most areas, existing building heights remain **40 feet (approximately four stories)**.
- The Plan allows **two to four additional stories** in select locations, mainly **near shopping, transit, and on major streets**, with high-rise buildings permitted only in limited areas.
- The Plan uses a **form-based approach**, regulating height, bulk, and setbacks, and is paired with **objective design standards**.
- The stated goals include meeting state housing requirements, maintaining local control over land use decisions, and strengthening tenant protections by directing growth toward underused and vacant sites.

Within this framework, the North Beach area surrounding **Joe DiMaggio Playground** is identified for **increased maximum building heights**, which in turn has the potential to increase shadow on the playground.

# III. OBJECTIVE OF THE SHADOW ANALYSIS

The objective of the shadow analysis is to **quantify net new shadow** that could occur on **Joe DiMaggio Playground** as a result of the **proposed Family Zoning height increases**, using standard methods applied in San Francisco shadow studies.

Specifically, the analysis aims to:

1. Measure **annual shadow load** on Joe DiMaggio Playground under:
    - Existing conditions, and
    - A scenario with Family Zoning Plan height increases.
2. Determine:
    - **Net new annual shadow** (in square foot hours, sfh),
    - **Percent of available sunlight time** affected,
    - **Maximum area of net new shadow** and **percentage of the playground covered**, and
    - **Dates, times of day, and seasons** when net new shadow occurs.

These results are summarized in the City's **"PROPOSED FAMILY ZONING HEIGHT INCREASE – JOE DIMAGGIO ANNUAL SHADOW LOADS / SQUARE FOOT HOURS (sfh)"** sheet, which is the primary quantitative source referenced here.

FASTCAST

# IV. QUANTITATIVE SHADOW RESULTS – JOE DIMAGGIO PLAYGROUND

All values below are taken directly from the **Joe DiMaggio Playground shadow summary** unless otherwise noted. Note: Existing shadow is based on Data SF Building Footprints : https://data.sfgov.org/Geographic-Locations-and-Boundaries/Building-Footprints/ynuv-fyni/about_data and Zoning heights derived from Proposed zoning interactive map: https://experience.arcgis.com/experience/6e0e399f9c82456dbda233eacebc433d/

| PROPOSED FAMILY ZONING HEIGHT INCREASE<br>JOE DIMAGGIO ANNUAL SHADOW LOADS / SQUARE FOOT HOURS (sfh) | | | |
|---|---|---|---|
| Existing / Current Shadow | Project Net New Shadow | Existing + Project Shadow | Remaining Sunlight |
| **9.63%** | **1.485%** | **11.115%** | **88.89%** |
| 31,210,748 sfh | 4,814,888 sfh | 36,025,636 sfh | 288,182,732 sfh |

| | |
|---|---|
| Joe DiMaggio Annual Shadow Load with Project (sfh) | 36,025,636 sfh |

| EXISTING SHADOW DETAILS | |
|---|---|
| Range in existing shadow area coverage throughout the year | Between 2% - 72% |
| Time of year / time of day most affected by existing shadow | Fall / Early Morning (before 8:00 AM) |

| NET NEW SHADOW DETAILS | |
|---|---|
| Days net new shadow would occur (date range) | Year-round |
| Date(s) with most sfh net new shadow | October 11 & March 1 |
| Season / Time of day most affected by net new shadow | Winter / Late Afternoon (after 4:30 PM) |
| Area of largest net new shadow (date and time) | 23,682 sf (October 11 & March 1 @ 5:37 PM ) |
| Percentage of Joe DiMaggio covered by largest shadow | 27.18% |
| Range in shadow coverage throughout the year (area range) | Between 0% - 27% (0 - 23,682 sf ) |
| Average shadow size across affected dates (percent coverage) | 4,488 sf (5.15%) |
| Date(s) with the longest duration of net new shadow (duration) | October 11 & March 1 (4 hr 6 min +/- 14 min) |
| Range in daily net new shadow duration across affected dates | Between zero minutes up to 4 hr 6 min (+/- 14 min) |
| Average daily net new shadow duration across affected dates | 3 hr 22 min |

## Timing and Seasonal Pattern of Net New Shadow

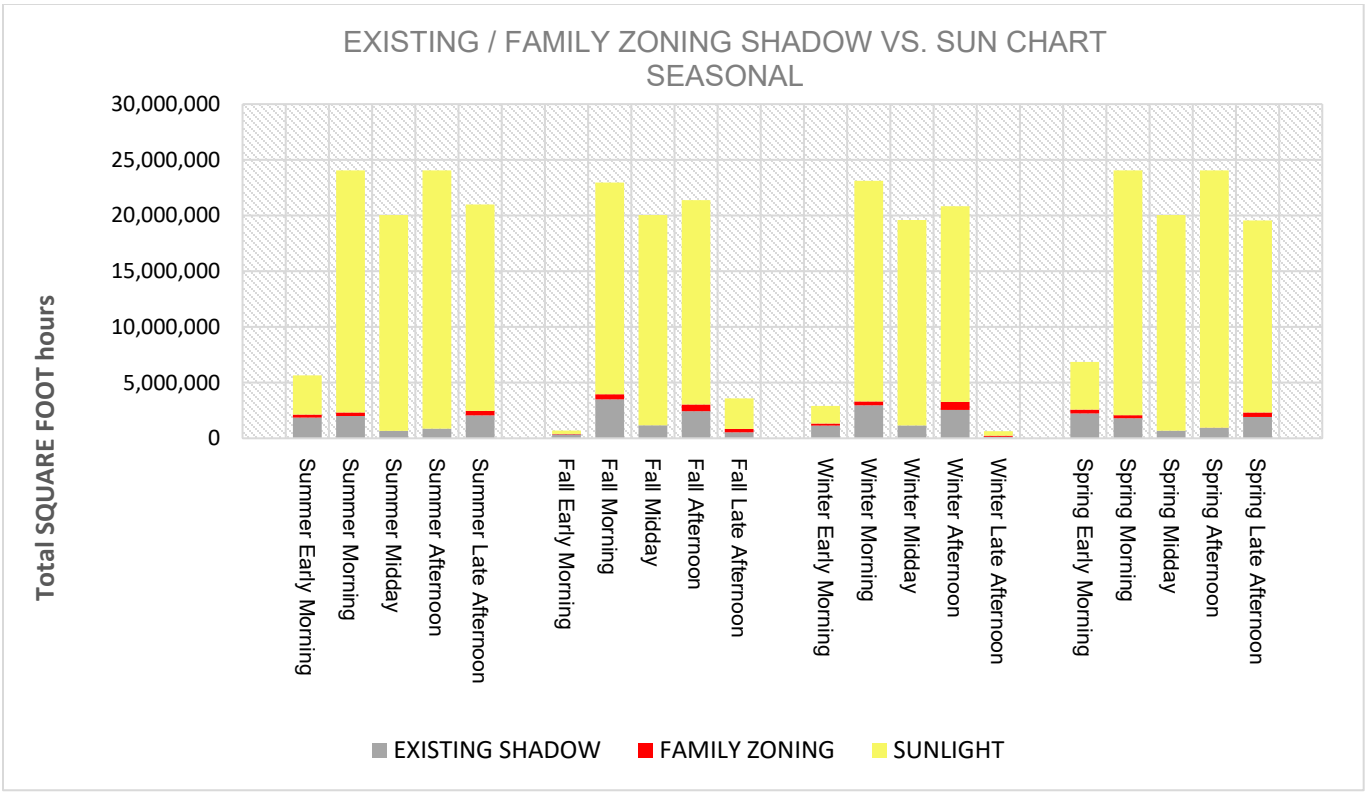
Also from the shadow summary:

- **Days net new shadow would occur:**
  - **Year-round**
- **Date(s) with most sfh net new shadow:**
  - **October 11 & March 1**
  - **Season / Time of day most affected by net new shadow: Winter / Late Afternoon (after 4:30 PM)**

## Existing Shadow Context

For reference, the summary characterizes **existing shadow** as:

- **Range in existing shadow area coverage throughout the year: 2% – 72%** of the playground area
- **Time of year / time of day most affected by existing shadow: Fall / Early Morning (before 8:00 AM)**




# V. QUALITATIVE CONTEXT: PLAYGROUND ACTIVITIES & TIME OF USE

This section does **not** evaluate impact or significance. It is limited to describing **typical types of activities** that commonly occur in neighborhood playgrounds like Joe DiMaggio during the times identified in the shadow summary.

## A. Typical Playground Use Patterns

Based on the nature of Joe DiMaggio Playground as a neighborhood-serving facility (with play equipment, courts/fields, and open space), typical use patterns can reasonably be described as including:

- **Morning hours:**
  - Caregivers with young children,
  - Individual exercise and walking.
- **Midday / Early afternoon:**
  - Younger children and caregivers,
  - Some daytime recreation by residents and visitors.
- **Afternoon / Late afternoon (after school):**
  - **School-aged children and teens** using play areas and courts,
  - Potential **organized or informal sports activities**,
  - Families visiting after school pick-up.
- **Early evening (seasonally):**
  - Adults and families using the space after work,
  - Light recreation, socializing, and play until dusk.

These patterns are typical of urban playgrounds serving nearby residential neighborhoods with families.

## B. Alignment with Net New Shadow Timing

The **shadow summary** identifies the **season and time of day most affected by net new shadow** as **"Winter / Late Afternoon (after 4:30 PM)"**, with net new shadow occurring **year-round** and the **longest durations and largest footprints** occurring around **October 11 and March 1 in the late afternoon (e.g., 5:37 PM for the largest single footprint).**
That time window generally overlaps with:

- **After-school hours** for school-aged children and teens, and
- **After-work hours** when adults and families may visit the playground.

The **existing shadow** is described as being most pronounced in **"Fall / Early Morning (before 8:00 AM)"**, which is a different part of the day than the late-afternoon period identified for net new shadow. This indicates that, under the Family Zoning scenario, the **distribution of shadow over the day** changes, with **additional shadow present during late-afternoon hours** when playground use often involves family and youth activities.
Again, this section is descriptive only and does not characterize these changes as beneficial or adverse.

# VI. SUMMARY

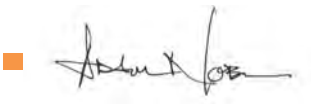
- The Family Zoning Plan allows **increased building heights** in select areas, including near Joe DiMaggio Playground, in order to support housing production goals and apply form-based, objective design standards.
- The City's **Joe DiMaggio shadow summary** quantifies **net new annual shadow load, coverage, and timing** for the playground under the Family Zoning height scenario, showing:
    - Net new shadow of **4,814,888 sfh (1.485% of available sunlight time)**,
    - A combined total shadow load of **36,025,636 sfh (11.115%)**,
    - Maximum net new momentary coverage of **23,682 square feet (27.18% of the playground)** on specific dates and times, and
    - Concentration of net new shadow in **winter late afternoons (after 4:30 PM)**, with **year-round occurrence**.
- Typical playground use during late afternoons includes **after-school and after-work** activities by children, teens, and families, which may coincide in time with the **period identified as most affected by net new shadow**.

This concludes the **descriptive, non-evaluative summary** of the Family Zoning Plan context and the associated shadow analysis results for Joe DiMaggio Playground.

## Conclusion

Fastcast has determined, based on the 3D digital zoning-based massing model and related design information provided by DataSF and the proposed Family Zoning Plan that the height increase would introduce net new shadow on Joe DiMaggio Playground relative to existing zoning conditions. The results presented herein reflect a programmatic, zoning-based analysis; as individual development proposals are advanced and more detailed building designs become available, additional project-specific shadow studies can be prepared using the same methodologies to further refine these findings.

Please direct any question to Adam Noble. adam@fastcastcity.com



# EXHIBIT A

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

FASTCAST

## JUNE 21

Summer solstice
Analysis hours: 6:46 AM-7:36 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 6:46 AM | 54,298 sf | 62.33% | 2,884 sf | 3.31% | |
| 7:00 AM | 37,059 sf | 42.54% | 4,008 sf | 4.60% | |
| 7:15 AM | 27,564 sf | 31.64% | 3,779 sf | 4.34% | |
| 7:30 AM | 21,585 sf | 24.78% | 3,408 sf | 3.91% | |
| 7:45 AM | 16,695 sf | 19.16% | 3,117 sf | 3.58% | |
| 8:00 AM | 12,478 sf | 14.32% | 2,829 sf | 3.25% | |
| 8:15 AM | 8,935 sf | 10.26% | 2,548 sf | 2.92% | |
| 8:30 AM | 5,965 sf | 6.85% | 2,316 sf | 2.66% | |
| 8:45 AM | 4,408 sf | 5.06% | 1,881 sf | 2.16% | |
| 9:00 AM | 4,173 sf | 4.79% | 730 sf | 0.84% | |
| 9:15 AM | 3,995 sf | 4.59% | 6 sf | 0.01% | |
| 9:30 AM | 3,816 sf | 4.38% | 0 sf | 0.00% | |
| 9:45 AM | 3,655 sf | 4.20% | 0 sf | 0.00% | |
| 10:00 AM | 3,476 sf | 3.99% | 0 sf | 0.00% | |
| 10:15 AM | 3,299 sf | 3.79% | 0 sf | 0.00% | |
| 10:30 AM | 3,114 sf | 3.57% | 0 sf | 0.00% | |
| 10:45 AM | 2,951 sf | 3.39% | 0 sf | 0.00% | |
| 11:00 AM | 2,772 sf | 3.18% | 0 sf | 0.00% | |
| 11:15 AM | 2,615 sf | 3.00% | 0 sf | 0.00% | |
| 11:30 AM | 2,434 sf | 2.79% | 0 sf | 0.00% | |
| 11:45 AM | 2,277 sf | 2.61% | 0 sf | 0.00% | |
| 12:00 PM | 2,094 sf | 2.40% | 0 sf | 0.00% | |
| 12:15 PM | 1,940 sf | 2.23% | 0 sf | 0.00% | |
| 12:30 PM | 1,737 sf | 1.99% | 0 sf | 0.00% | |
| 12:45 PM | 1,578 sf | 1.81% | 0 sf | 0.00% | |
| 1:00 PM | 1,344 sf | 1.54% | 0 sf | 0.00% | |
| 1:15 PM | 1,442 sf | 1.66% | 0 sf | 0.00% | |
| 1:30 PM | 1,521 sf | 1.75% | 0 sf | 0.00% | |
| 1:45 PM | 1,658 sf | 1.90% | 0 sf | 0.00% | |
| 2:00 PM | 1,721 sf | 1.98% | 0 sf | 0.00% | |
| 2:15 PM | 1,841 sf | 2.11% | 0 sf | 0.00% | |
| 2:30 PM | 1,898 sf | 2.18% | 0 sf | 0.00% | |
| 2:45 PM | 1,995 sf | 2.29% | 0 sf | 0.00% | |
| 3:00 PM | 2,049 sf | 2.35% | 0 sf | 0.00% | |
| 3:15 PM | 2,132 sf | 2.45% | 0 sf | 0.00% | |
| 3:30 PM | 2,186 sf | 2.51% | 0 sf | 0.00% | |
| 3:45 PM | 2,248 sf | 2.58% | 0 sf | 0.00% | |
| 4:00 PM | 2,241 sf | 2.57% | 0 sf | 0.00% | |
| 4:15 PM | 2,472 sf | 2.84% | 0 sf | 0.00% | |
| 4:30 PM | 3,013 sf | 3.46% | 0 sf | 0.00% | |
| 4:45 PM | 3,530 sf | 4.05% | 0 sf | 0.00% | |
| 5:00 PM | 4,110 sf | 4.72% | 0 sf | 0.00% | |
| 5:15 PM | 4,753 sf | 5.46% | 0 sf | 0.00% | |
| 5:30 PM | 5,486 sf | 6.30% | 0 sf | 0.00% | |
| 5:45 PM | 6,314 sf | 7.25% | 0 sf | 0.00% | |
| 6:00 PM | 7,287 sf | 8.36% | 0 sf | 0.00% | |
| 6:15 PM | 8,437 sf | 9.68% | 0 sf | 0.00% | |
| 6:30 PM | 9,878 sf | 11.34% | 0 sf | 0.00% | |
| 6:45 PM | 11,730 sf | 13.46% | 295 sf | 0.34% | |
| 7:00 PM | 14,222 sf | 16.33% | 1,770 sf | 2.03% | |
| 7:15 PM | 17,809 sf | 20.44% | 5,586 sf | 6.41% | |
| 7:36 PM | 29,084 sf | 33.38% | 10,652 sf | 12.23% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# JUNE 28

Mirror date: June 14
Analysis hours: 6:48 AM-7:36 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 6:48 AM | 54,172 sf | 62.18% | 2,814 sf | 3.23% | |
| 7:00 AM | 38,856 sf | 44.60% | 4,046 sf | 4.64% | |
| 7:15 AM | 28,513 sf | 32.73% | 3,845 sf | 4.41% | |
| 7:30 AM | 22,279 sf | 25.57% | 3,463 sf | 3.97% | |
| 7:45 AM | 17,311 sf | 19.87% | 3,154 sf | 3.62% | |
| 8:00 AM | 12,968 sf | 14.88% | 2,875 sf | 3.30% | |
| 8:15 AM | 9,336 sf | 10.72% | 2,593 sf | 2.98% | |
| 8:30 AM | 6,273 sf | 7.20% | 2,353 sf | 2.70% | |
| 8:45 AM | 4,507 sf | 5.17% | 2,014 sf | 2.31% | |
| 9:00 AM | 4,222 sf | 4.85% | 875 sf | 1.00% | |
| 9:15 AM | 4,036 sf | 4.63% | 30 sf | 0.03% | |
| 9:30 AM | 3,857 sf | 4.43% | 0 sf | 0.00% | |
| 9:45 AM | 3,694 sf | 4.24% | 0 sf | 0.00% | |
| 10:00 AM | 3,516 sf | 4.04% | 0 sf | 0.00% | |
| 10:15 AM | 3,340 sf | 3.83% | 0 sf | 0.00% | |
| 10:30 AM | 3,152 sf | 3.62% | 0 sf | 0.00% | |
| 10:45 AM | 2,989 sf | 3.43% | 0 sf | 0.00% | |
| 11:00 AM | 2,807 sf | 3.22% | 0 sf | 0.00% | |
| 11:15 AM | 2,650 sf | 3.04% | 0 sf | 0.00% | |
| 11:30 AM | 2,469 sf | 2.83% | 0 sf | 0.00% | |
| 11:45 AM | 2,308 sf | 2.65% | 0 sf | 0.00% | |
| 12:00 PM | 2,127 sf | 2.44% | 0 sf | 0.00% | |
| 12:15 PM | 1,973 sf | 2.26% | 0 sf | 0.00% | |
| 12:30 PM | 1,769 sf | 2.03% | 0 sf | 0.00% | |
| 12:45 PM | 1,612 sf | 1.85% | 0 sf | 0.00% | |
| 1:00 PM | 1,364 sf | 1.57% | 0 sf | 0.00% | |
| 1:15 PM | 1,451 sf | 1.67% | 0 sf | 0.00% | |
| 1:30 PM | 1,523 sf | 1.75% | 0 sf | 0.00% | |
| 1:45 PM | 1,661 sf | 1.91% | 0 sf | 0.00% | |
| 2:00 PM | 1,728 sf | 1.98% | 0 sf | 0.00% | |
| 2:15 PM | 1,848 sf | 2.12% | 0 sf | 0.00% | |
| 2:30 PM | 1,902 sf | 2.18% | 0 sf | 0.00% | |
| 2:45 PM | 2,006 sf | 2.30% | 0 sf | 0.00% | |
| 3:00 PM | 2,063 sf | 2.37% | 0 sf | 0.00% | |
| 3:15 PM | 2,146 sf | 2.46% | 0 sf | 0.00% | |
| 3:30 PM | 2,197 sf | 2.52% | 0 sf | 0.00% | |
| 3:45 PM | 2,264 sf | 2.60% | 0 sf | 0.00% | |
| 4:00 PM | 2,230 sf | 2.56% | 0 sf | 0.00% | |
| 4:15 PM | 2,455 sf | 2.82% | 0 sf | 0.00% | |
| 4:30 PM | 2,953 sf | 3.39% | 0 sf | 0.00% | |
| 4:45 PM | 3,470 sf | 3.98% | 0 sf | 0.00% | |
| 5:00 PM | 4,046 sf | 4.64% | 0 sf | 0.00% | |
| 5:15 PM | 4,679 sf | 5.37% | 0 sf | 0.00% | |
| 5:30 PM | 5,407 sf | 6.21% | 0 sf | 0.00% | |
| 5:45 PM | 6,230 sf | 7.15% | 0 sf | 0.00% | |
| 6:00 PM | 7,192 sf | 8.26% | 0 sf | 0.00% | |
| 6:15 PM | 8,321 sf | 9.55% | 0 sf | 0.00% | |
| 6:30 PM | 9,741 sf | 11.18% | 0 sf | 0.00% | |
| 6:45 PM | 11,553 sf | 13.26% | 223 sf | 0.26% | |
| 7:00 PM | 13,976 sf | 16.04% | 1,556 sf | 1.79% | |
| 7:15 PM | 17,471 sf | 20.05% | 5,228 sf | 6.00% | |
| 7:36 PM | 28,841 sf | 33.10% | 10,732 sf | 12.32% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# JULY 5

Mirror date: June 7
Analysis hours: 6:52 AM-7:36 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 6:52 AM | 53,801 sf | 61.75% | 2,547 sf | 2.92% | |
| 7:00 AM | 41,891 sf | 48.08% | 4,088 sf | 4.69% | |
| 7:15 AM | 29,973 sf | 34.40% | 3,979 sf | 4.57% | |
| 7:30 AM | 23,337 sf | 26.79% | 3,577 sf | 4.11% | |
| 7:45 AM | 18,182 sf | 20.87% | 3,252 sf | 3.73% | |
| 8:00 AM | 13,674 sf | 15.70% | 2,949 sf | 3.39% | |
| 8:15 AM | 9,879 sf | 11.34% | 2,662 sf | 3.06% | |
| 8:30 AM | 6,755 sf | 7.75% | 2,412 sf | 2.77% | |
| 8:45 AM | 4,826 sf | 5.54% | 2,115 sf | 2.43% | |
| 9:00 AM | 4,330 sf | 4.97% | 1,079 sf | 1.24% | |
| 9:15 AM | 4,139 sf | 4.75% | 107 sf | 0.12% | |
| 9:30 AM | 3,954 sf | 4.54% | 0 sf | 0.00% | |
| 9:45 AM | 3,782 sf | 4.34% | 0 sf | 0.00% | |
| 10:00 AM | 3,600 sf | 4.13% | 0 sf | 0.00% | |
| 10:15 AM | 3,421 sf | 3.93% | 0 sf | 0.00% | |
| 10:30 AM | 3,230 sf | 3.71% | 0 sf | 0.00% | |
| 10:45 AM | 3,063 sf | 3.52% | 0 sf | 0.00% | |
| 11:00 AM | 2,880 sf | 3.31% | 0 sf | 0.00% | |
| 11:15 AM | 2,722 sf | 3.12% | 0 sf | 0.00% | |
| 11:30 AM | 2,539 sf | 2.91% | 0 sf | 0.00% | |
| 11:45 AM | 2,377 sf | 2.73% | 0 sf | 0.00% | |
| 12:00 PM | 2,192 sf | 2.52% | 0 sf | 0.00% | |
| 12:15 PM | 2,041 sf | 2.34% | 0 sf | 0.00% | |
| 12:30 PM | 1,835 sf | 2.11% | 0 sf | 0.00% | |
| 12:45 PM | 1,675 sf | 1.92% | 0 sf | 0.00% | |
| 1:00 PM | 1,424 sf | 1.63% | 0 sf | 0.00% | |
| 1:15 PM | 1,483 sf | 1.70% | 0 sf | 0.00% | |
| 1:30 PM | 1,568 sf | 1.80% | 0 sf | 0.00% | |
| 1:45 PM | 1,705 sf | 1.96% | 0 sf | 0.00% | |
| 2:00 PM | 1,776 sf | 2.04% | 0 sf | 0.00% | |
| 2:15 PM | 1,894 sf | 2.17% | 0 sf | 0.00% | |
| 2:30 PM | 1,956 sf | 2.24% | 0 sf | 0.00% | |
| 2:45 PM | 2,062 sf | 2.37% | 0 sf | 0.00% | |
| 3:00 PM | 2,117 sf | 2.43% | 0 sf | 0.00% | |
| 3:15 PM | 2,204 sf | 2.53% | 0 sf | 0.00% | |
| 3:30 PM | 2,256 sf | 2.59% | 0 sf | 0.00% | |
| 3:45 PM | 2,337 sf | 2.68% | 0 sf | 0.00% | |
| 4:00 PM | 2,358 sf | 2.71% | 0 sf | 0.00% | |
| 4:15 PM | 2,466 sf | 2.83% | 0 sf | 0.00% | |
| 4:30 PM | 2,885 sf | 3.31% | 0 sf | 0.00% | |
| 4:45 PM | 3,408 sf | 3.91% | 0 sf | 0.00% | |
| 5:00 PM | 3,984 sf | 4.57% | 0 sf | 0.00% | |
| 5:15 PM | 4,615 sf | 5.30% | 0 sf | 0.00% | |
| 5:30 PM | 5,340 sf | 6.13% | 0 sf | 0.00% | |
| 5:45 PM | 6,165 sf | 7.08% | 0 sf | 0.00% | |
| 6:00 PM | 7,127 sf | 8.18% | 0 sf | 0.00% | |
| 6:15 PM | 8,255 sf | 9.48% | 0 sf | 0.00% | |
| 6:30 PM | 9,671 sf | 11.10% | 0 sf | 0.00% | |
| 6:45 PM | 11,478 sf | 13.17% | 170 sf | 0.20% | |
| 7:00 PM | 13,898 sf | 15.95% | 1,396 sf | 1.60% | |
| 7:15 PM | 17,367 sf | 19.94% | 4,992 sf | 5.73% | |
| 7:36 PM | 28,122 sf | 32.28% | 10,951 sf | 12.57% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# JULY 12

Mirror date: May 31
Analysis hours: 6:56 AM-7:33 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 6:56 AM | 53,097 sf | 60.95% | 2,408 sf | 2.76% | |
| 7:00 AM | 47,045 sf | 54.00% | 3,395 sf | 3.90% | |
| 7:15 AM | 32,076 sf | 36.82% | 4,194 sf | 4.81% | |
| 7:30 AM | 24,775 sf | 28.44% | 3,764 sf | 4.32% | |
| 7:45 AM | 19,251 sf | 22.10% | 3,412 sf | 3.92% | |
| 8:00 AM | 14,578 sf | 16.73% | 3,072 sf | 3.53% | |
| 8:15 AM | 10,583 sf | 12.15% | 2,769 sf | 3.18% | |
| 8:30 AM | 7,405 sf | 8.50% | 2,490 sf | 2.86% | |
| 8:45 AM | 5,297 sf | 6.08% | 2,234 sf | 2.56% | |
| 9:00 AM | 4,503 sf | 5.17% | 1,333 sf | 1.53% | |
| 9:15 AM | 4,299 sf | 4.93% | 244 sf | 0.28% | |
| 9:30 AM | 4,099 sf | 4.71% | 0 sf | 0.00% | |
| 9:45 AM | 3,921 sf | 4.50% | 0 sf | 0.00% | |
| 10:00 AM | 3,732 sf | 4.28% | 0 sf | 0.00% | |
| 10:15 AM | 3,545 sf | 4.07% | 0 sf | 0.00% | |
| 10:30 AM | 3,347 sf | 3.84% | 0 sf | 0.00% | |
| 10:45 AM | 3,178 sf | 3.65% | 0 sf | 0.00% | |
| 11:00 AM | 2,989 sf | 3.43% | 0 sf | 0.00% | |
| 11:15 AM | 2,825 sf | 3.24% | 0 sf | 0.00% | |
| 11:30 AM | 2,640 sf | 3.03% | 0 sf | 0.00% | |
| 11:45 AM | 2,482 sf | 2.85% | 0 sf | 0.00% | |
| 12:00 PM | 2,290 sf | 2.63% | 0 sf | 0.00% | |
| 12:15 PM | 2,134 sf | 2.45% | 0 sf | 0.00% | |
| 12:30 PM | 1,930 sf | 2.22% | 0 sf | 0.00% | |
| 12:45 PM | 1,769 sf | 2.03% | 0 sf | 0.00% | |
| 1:00 PM | 1,511 sf | 1.73% | 0 sf | 0.00% | |
| 1:15 PM | 1,552 sf | 1.78% | 0 sf | 0.00% | |
| 1:30 PM | 1,648 sf | 1.89% | 0 sf | 0.00% | |
| 1:45 PM | 1,788 sf | 2.05% | 0 sf | 0.00% | |
| 2:00 PM | 1,857 sf | 2.13% | 0 sf | 0.00% | |
| 2:15 PM | 1,980 sf | 2.27% | 0 sf | 0.00% | |
| 2:30 PM | 2,043 sf | 2.34% | 0 sf | 0.00% | |
| 2:45 PM | 2,144 sf | 2.46% | 0 sf | 0.00% | |
| 3:00 PM | 2,204 sf | 2.53% | 0 sf | 0.00% | |
| 3:15 PM | 2,300 sf | 2.64% | 0 sf | 0.00% | |
| 3:30 PM | 2,352 sf | 2.70% | 0 sf | 0.00% | |
| 3:45 PM | 2,434 sf | 2.79% | 0 sf | 0.00% | |
| 4:00 PM | 2,473 sf | 2.84% | 0 sf | 0.00% | |
| 4:15 PM | 2,494 sf | 2.86% | 0 sf | 0.00% | |
| 4:30 PM | 2,739 sf | 3.14% | 0 sf | 0.00% | |
| 4:45 PM | 3,340 sf | 3.83% | 0 sf | 0.00% | |
| 5:00 PM | 3,920 sf | 4.50% | 0 sf | 0.00% | |
| 5:15 PM | 4,559 sf | 5.23% | 0 sf | 0.00% | |
| 5:30 PM | 5,289 sf | 6.07% | 0 sf | 0.00% | |
| 5:45 PM | 6,121 sf | 7.03% | 0 sf | 0.00% | |
| 6:00 PM | 7,093 sf | 8.14% | 0 sf | 0.00% | |
| 6:15 PM | 8,235 sf | 9.45% | 0 sf | 0.00% | |
| 6:30 PM | 9,661 sf | 11.09% | 0 sf | 0.00% | |
| 6:45 PM | 11,496 sf | 13.20% | 125 sf | 0.14% | |
| 7:00 PM | 13,972 sf | 16.04% | 1,296 sf | 1.49% | |
| 7:15 PM | 17,555 sf | 20.15% | 5,128 sf | 5.89% | |
| 7:33 PM | 26,959 sf | 30.95% | 11,312 sf | 12.98% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# JULY 19

Mirror date: May 24
Analysis hours: 7:01 AM-7:30 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:01 AM | 52,271 sf | 60.00% | 2,281 sf | 2.62% | |
| 7:16 AM | 33,985 sf | 39.01% | 4,487 sf | 5.15% | |
| 7:30 AM | 26,609 sf | 30.54% | 4,026 sf | 4.62% | |
| 7:45 AM | 20,576 sf | 23.62% | 3,616 sf | 4.15% | |
| 8:00 AM | 15,675 sf | 17.99% | 3,246 sf | 3.73% | |
| 8:15 AM | 11,348 sf | 13.03% | 2,894 sf | 3.32% | |
| 8:30 AM | 8,334 sf | 9.57% | 2,614 sf | 3.00% | |
| 8:45 AM | 5,925 sf | 6.80% | 2,348 sf | 2.69% | |
| 9:00 AM | 4,748 sf | 5.45% | 1,645 sf | 1.89% | |
| 9:15 AM | 4,521 sf | 5.19% | 435 sf | 0.50% | |
| 9:30 AM | 4,297 sf | 4.93% | 0 sf | 0.00% | |
| 9:45 AM | 4,101 sf | 4.71% | 0 sf | 0.00% | |
| 10:00 AM | 3,908 sf | 4.49% | 0 sf | 0.00% | |
| 10:15 AM | 3,712 sf | 4.26% | 0 sf | 0.00% | |
| 10:30 AM | 3,506 sf | 4.02% | 0 sf | 0.00% | |
| 10:45 AM | 3,328 sf | 3.82% | 0 sf | 0.00% | |
| 11:00 AM | 3,134 sf | 3.60% | 0 sf | 0.00% | |
| 11:15 AM | 2,966 sf | 3.40% | 0 sf | 0.00% | |
| 11:30 AM | 2,777 sf | 3.19% | 0 sf | 0.00% | |
| 11:45 AM | 2,612 sf | 3.00% | 0 sf | 0.00% | |
| 12:00 PM | 2,418 sf | 2.78% | 0 sf | 0.00% | |
| 12:15 PM | 2,259 sf | 2.59% | 0 sf | 0.00% | |
| 12:30 PM | 2,055 sf | 2.36% | 0 sf | 0.00% | |
| 12:45 PM | 1,889 sf | 2.17% | 0 sf | 0.00% | |
| 1:00 PM | 1,634 sf | 1.88% | 0 sf | 0.00% | |
| 1:15 PM | 1,667 sf | 1.91% | 0 sf | 0.00% | |
| 1:30 PM | 1,764 sf | 2.03% | 0 sf | 0.00% | |
| 1:45 PM | 1,906 sf | 2.19% | 0 sf | 0.00% | |
| 2:00 PM | 1,976 sf | 2.27% | 0 sf | 0.00% | |
| 2:15 PM | 2,103 sf | 2.41% | 0 sf | 0.00% | |
| 2:30 PM | 2,169 sf | 2.49% | 0 sf | 0.00% | |
| 2:45 PM | 2,279 sf | 2.62% | 0 sf | 0.00% | |
| 3:00 PM | 2,341 sf | 2.69% | 0 sf | 0.00% | |
| 3:15 PM | 2,433 sf | 2.79% | 0 sf | 0.00% | |
| 3:30 PM | 2,495 sf | 2.86% | 0 sf | 0.00% | |
| 3:45 PM | 2,579 sf | 2.96% | 0 sf | 0.00% | |
| 4:00 PM | 2,632 sf | 3.02% | 0 sf | 0.00% | |
| 4:15 PM | 2,708 sf | 3.11% | 0 sf | 0.00% | |
| 4:30 PM | 2,796 sf | 3.21% | 0 sf | 0.00% | |
| 4:45 PM | 3,271 sf | 3.75% | 0 sf | 0.00% | |
| 5:00 PM | 3,867 sf | 4.44% | 0 sf | 0.00% | |
| 5:15 PM | 4,521 sf | 5.19% | 0 sf | 0.00% | |
| 5:30 PM | 5,258 sf | 6.04% | 0 sf | 0.00% | |
| 5:45 PM | 6,110 sf | 7.01% | 0 sf | 0.00% | |
| 6:00 PM | 7,108 sf | 8.16% | 0 sf | 0.00% | |
| 6:15 PM | 8,283 sf | 9.51% | 0 sf | 0.00% | |
| 6:30 PM | 9,748 sf | 11.19% | 0 sf | 0.00% | |
| 6:45 PM | 11,658 sf | 13.38% | 95 sf | 0.11% | |
| 7:00 PM | 14,252 sf | 16.36% | 1,311 sf | 1.50% | |
| 7:15 PM | 18,041 sf | 20.71% | 5,948 sf | 6.83% | |
| 7:30 PM | 25,516 sf | 29.29% | 11,670 sf | 13.39% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# JULY 26

Mirror date: May 17
Analysis hours: 7:07 AM-7:25 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

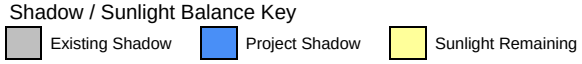
| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:07 AM | 51,090 sf | 58.64% | 2,572 sf | 2.95% | |
| 7:15 AM | 38,869 sf | 44.62% | 4,946 sf | 5.68% | |
| 7:30 AM | 29,015 sf | 33.30% | 4,396 sf | 5.05% | |
| 7:45 AM | 22,226 sf | 25.51% | 3,892 sf | 4.47% | |
| 8:00 AM | 17,041 sf | 19.56% | 3,464 sf | 3.98% | |
| 8:15 AM | 12,600 sf | 14.46% | 3,080 sf | 3.54% | |
| 8:30 AM | 9,453 sf | 10.85% | 2,749 sf | 3.16% | |
| 8:45 AM | 6,765 sf | 7.77% | 2,461 sf | 2.82% | |
| 9:00 AM | 5,085 sf | 5.84% | 1,979 sf | 2.27% | |
| 9:15 AM | 4,794 sf | 5.50% | 709 sf | 0.81% | |
| 9:30 AM | 4,553 sf | 5.23% | 0 sf | 0.00% | |
| 9:45 AM | 4,336 sf | 4.98% | 0 sf | 0.00% | |
| 10:00 AM | 4,121 sf | 4.73% | 0 sf | 0.00% | |
| 10:15 AM | 3,918 sf | 4.50% | 0 sf | 0.00% | |
| 10:30 AM | 3,704 sf | 4.25% | 0 sf | 0.00% | |
| 10:45 AM | 3,517 sf | 4.04% | 0 sf | 0.00% | |
| 11:00 AM | 3,313 sf | 3.80% | 0 sf | 0.00% | |
| 11:15 AM | 3,139 sf | 3.60% | 0 sf | 0.00% | |
| 11:30 AM | 2,940 sf | 3.37% | 0 sf | 0.00% | |
| 11:45 AM | 2,774 sf | 3.18% | 0 sf | 0.00% | |
| 12:00 PM | 2,575 sf | 2.96% | 0 sf | 0.00% | |
| 12:15 PM | 2,411 sf | 2.77% | 0 sf | 0.00% | |
| 12:30 PM | 2,204 sf | 2.53% | 0 sf | 0.00% | |
| 12:45 PM | 2,039 sf | 2.34% | 0 sf | 0.00% | |
| 1:00 PM | 1,783 sf | 2.05% | 0 sf | 0.00% | |
| 1:15 PM | 1,826 sf | 2.10% | 0 sf | 0.00% | |
| 1:30 PM | 1,921 sf | 2.21% | 0 sf | 0.00% | |
| 1:45 PM | 2,063 sf | 2.37% | 0 sf | 0.00% | |
| 2:00 PM | 2,139 sf | 2.45% | 0 sf | 0.00% | |
| 2:15 PM | 2,261 sf | 2.60% | 0 sf | 0.00% | |
| 2:30 PM | 2,336 sf | 2.68% | 0 sf | 0.00% | |
| 2:45 PM | 2,452 sf | 2.81% | 0 sf | 0.00% | |
| 3:00 PM | 2,518 sf | 2.89% | 0 sf | 0.00% | |
| 3:15 PM | 2,619 sf | 3.01% | 0 sf | 0.00% | |
| 3:30 PM | 2,681 sf | 3.08% | 0 sf | 0.00% | |
| 3:45 PM | 2,775 sf | 3.19% | 0 sf | 0.00% | |
| 4:00 PM | 2,839 sf | 3.26% | 0 sf | 0.00% | |
| 4:15 PM | 2,913 sf | 3.34% | 0 sf | 0.00% | |
| 4:30 PM | 2,900 sf | 3.33% | 0 sf | 0.00% | |
| 4:45 PM | 3,172 sf | 3.64% | 0 sf | 0.00% | |
| 5:00 PM | 3,822 sf | 4.39% | 0 sf | 0.00% | |
| 5:15 PM | 4,489 sf | 5.15% | 0 sf | 0.00% | |
| 5:30 PM | 5,251 sf | 6.03% | 0 sf | 0.00% | |
| 5:45 PM | 6,127 sf | 7.03% | 0 sf | 0.00% | |
| 6:00 PM | 7,164 sf | 8.22% | 0 sf | 0.00% | |
| 6:15 PM | 8,391 sf | 9.63% | 0 sf | 0.00% | |
| 6:30 PM | 9,922 sf | 11.39% | 0 sf | 0.00% | |
| 6:45 PM | 11,942 sf | 13.71% | 76 sf | 0.09% | |
| 7:00 PM | 14,750 sf | 16.93% | 2,024 sf | 2.32% | |
| 7:15 PM | 18,880 sf | 21.67% | 7,511 sf | 8.62% | |
| 7:25 PM | 23,869 sf | 27.40% | 11,981 sf | 13.75% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# AUGUST 2

Mirror date: May 10
Analysis hours: 7:12 AM-7:18 PM (PDT)

Shadow / Sunlight Balance Key



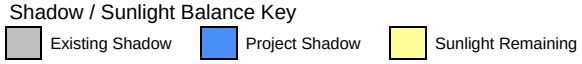

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:12 AM | 48,899 sf | 56.13% | 3,210 sf | 3.68% | |
| 7:15 AM | 44,825 sf | 51.45% | 4,215 sf | 4.84% | |
| 7:30 AM | 31,918 sf | 36.64% | 4,868 sf | 5.59% | |
| 7:45 AM | 24,175 sf | 27.75% | 4,263 sf | 4.89% | |
| 8:00 AM | 18,553 sf | 21.30% | 3,728 sf | 4.28% | |
| 8:15 AM | 14,279 sf | 16.39% | 3,295 sf | 3.78% | |
| 8:30 AM | 10,743 sf | 12.33% | 2,923 sf | 3.36% | |
| 8:45 AM | 7,817 sf | 8.97% | 2,600 sf | 2.98% | |
| 9:00 AM | 5,672 sf | 6.51% | 2,244 sf | 2.58% | |
| 9:15 AM | 5,131 sf | 5.89% | 1,027 sf | 1.18% | |
| 9:30 AM | 4,852 sf | 5.57% | 31 sf | 0.04% | |
| 9:45 AM | 4,613 sf | 5.30% | 0 sf | 0.00% | |
| 10:00 AM | 4,376 sf | 5.02% | 0 sf | 0.00% | |
| 10:15 AM | 4,168 sf | 4.78% | 0 sf | 0.00% | |
| 10:30 AM | 3,937 sf | 4.52% | 0 sf | 0.00% | |
| 10:45 AM | 3,739 sf | 4.29% | 0 sf | 0.00% | |
| 11:00 AM | 3,523 sf | 4.04% | 0 sf | 0.00% | |
| 11:15 AM | 3,342 sf | 3.84% | 0 sf | 0.00% | |
| 11:30 AM | 3,133 sf | 3.60% | 0 sf | 0.00% | |
| 11:45 AM | 2,962 sf | 3.40% | 0 sf | 0.00% | |
| 12:00 PM | 2,757 sf | 3.16% | 0 sf | 0.00% | |
| 12:15 PM | 2,591 sf | 2.97% | 0 sf | 0.00% | |
| 12:30 PM | 2,382 sf | 2.73% | 0 sf | 0.00% | |
| 12:45 PM | 2,210 sf | 2.54% | 0 sf | 0.00% | |
| 1:00 PM | 1,959 sf | 2.25% | 0 sf | 0.00% | |
| 1:15 PM | 2,024 sf | 2.32% | 0 sf | 0.00% | |
| 1:30 PM | 2,120 sf | 2.43% | 0 sf | 0.00% | |
| 1:45 PM | 2,258 sf | 2.59% | 0 sf | 0.00% | |
| 2:00 PM | 2,339 sf | 2.69% | 0 sf | 0.00% | |
| 2:15 PM | 2,465 sf | 2.83% | 0 sf | 0.00% | |
| 2:30 PM | 2,542 sf | 2.92% | 0 sf | 0.00% | |
| 2:45 PM | 2,661 sf | 3.05% | 0 sf | 0.00% | |
| 3:00 PM | 2,738 sf | 3.14% | 0 sf | 0.00% | |
| 3:15 PM | 2,844 sf | 3.26% | 0 sf | 0.00% | |
| 3:30 PM | 2,912 sf | 3.34% | 0 sf | 0.00% | |
| 3:45 PM | 3,018 sf | 3.46% | 0 sf | 0.00% | |
| 4:00 PM | 3,086 sf | 3.54% | 0 sf | 0.00% | |
| 4:15 PM | 3,193 sf | 3.67% | 0 sf | 0.00% | |
| 4:30 PM | 3,263 sf | 3.74% | 0 sf | 0.00% | |
| 4:45 PM | 3,320 sf | 3.81% | 0 sf | 0.00% | |
| 5:00 PM | 3,739 sf | 4.29% | 0 sf | 0.00% | |
| 5:15 PM | 4,484 sf | 5.15% | 0 sf | 0.00% | |
| 5:30 PM | 5,284 sf | 6.06% | 0 sf | 0.00% | |
| 5:45 PM | 6,195 sf | 7.11% | 0 sf | 0.00% | |
| 6:00 PM | 7,291 sf | 8.37% | 0 sf | 0.00% | |
| 6:15 PM | 8,600 sf | 9.87% | 0 sf | 0.00% | |
| 6:30 PM | 10,238 sf | 11.75% | 20 sf | 0.02% | |
| 6:45 PM | 12,439 sf | 14.28% | 571 sf | 0.66% | |
| 7:00 PM | 15,579 sf | 17.88% | 3,668 sf | 4.21% | |
| 7:15 PM | 20,473 sf | 23.50% | 9,975 sf | 11.45% | |
| 7:18 PM | 22,329 sf | 25.63% | 11,739 sf | 13.47% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# AUGUST 9

Mirror date: May 3
Analysis hours: 7:19 AM-7:10 PM (PDT)

Shadow / Sunlight Balance Key




| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:19 AM | 47,564 sf | 54.60% | 3,935 sf | 4.52% | |
| 7:30 AM | 35,705 sf | 40.98% | 5,440 sf | 6.24% | |
| 7:45 AM | 26,531 sf | 30.45% | 4,730 sf | 5.43% | |
| 8:00 AM | 20,849 sf | 23.93% | 4,088 sf | 4.69% | |
| 8:15 AM | 16,239 sf | 18.64% | 3,560 sf | 4.09% | |
| 8:30 AM | 12,269 sf | 14.08% | 3,131 sf | 3.59% | |
| 8:45 AM | 9,041 sf | 10.38% | 2,768 sf | 3.18% | |
| 9:00 AM | 6,489 sf | 7.45% | 2,425 sf | 2.78% | |
| 9:15 AM | 5,524 sf | 6.34% | 1,383 sf | 1.59% | |
| 9:30 AM | 5,210 sf | 5.98% | 162 sf | 0.19% | |
| 9:45 AM | 4,940 sf | 5.67% | 0 sf | 0.00% | |
| 10:00 AM | 4,678 sf | 5.37% | 0 sf | 0.00% | |
| 10:15 AM | 4,449 sf | 5.11% | 0 sf | 0.00% | |
| 10:30 AM | 4,206 sf | 4.83% | 0 sf | 0.00% | |
| 10:45 AM | 3,993 sf | 4.58% | 0 sf | 0.00% | |
| 11:00 AM | 3,769 sf | 4.33% | 0 sf | 0.00% | |
| 11:15 AM | 3,570 sf | 4.10% | 0 sf | 0.00% | |
| 11:30 AM | 3,356 sf | 3.85% | 0 sf | 0.00% | |
| 11:45 AM | 3,181 sf | 3.65% | 0 sf | 0.00% | |
| 12:00 PM | 2,969 sf | 3.41% | 0 sf | 0.00% | |
| 12:15 PM | 2,796 sf | 3.21% | 0 sf | 0.00% | |
| 12:30 PM | 2,582 sf | 2.96% | 0 sf | 0.00% | |
| 12:45 PM | 2,405 sf | 2.76% | 0 sf | 0.00% | |
| 1:00 PM | 2,161 sf | 2.48% | 0 sf | 0.00% | |
| 1:15 PM | 2,255 sf | 2.59% | 0 sf | 0.00% | |
| 1:30 PM | 2,348 sf | 2.69% | 0 sf | 0.00% | |
| 1:45 PM | 2,489 sf | 2.86% | 0 sf | 0.00% | |
| 2:00 PM | 2,572 sf | 2.95% | 0 sf | 0.00% | |
| 2:15 PM | 2,707 sf | 3.11% | 0 sf | 0.00% | |
| 2:30 PM | 2,790 sf | 3.20% | 0 sf | 0.00% | |
| 2:45 PM | 2,916 sf | 3.35% | 0 sf | 0.00% | |
| 3:00 PM | 2,993 sf | 3.44% | 0 sf | 0.00% | |
| 3:15 PM | 3,113 sf | 3.57% | 0 sf | 0.00% | |
| 3:30 PM | 3,195 sf | 3.67% | 0 sf | 0.00% | |
| 3:45 PM | 3,308 sf | 3.80% | 0 sf | 0.00% | |
| 4:00 PM | 3,388 sf | 3.89% | 0 sf | 0.00% | |
| 4:15 PM | 3,499 sf | 4.02% | 0 sf | 0.00% | |
| 4:30 PM | 3,591 sf | 4.12% | 0 sf | 0.00% | |
| 4:45 PM | 3,715 sf | 4.26% | 0 sf | 0.00% | |
| 5:00 PM | 3,848 sf | 4.42% | 0 sf | 0.00% | |
| 5:15 PM | 4,499 sf | 5.16% | 0 sf | 0.00% | |
| 5:30 PM | 5,347 sf | 6.14% | 0 sf | 0.00% | |
| 5:45 PM | 6,322 sf | 7.26% | 0 sf | 0.00% | |
| 6:00 PM | 7,490 sf | 8.60% | 0 sf | 0.00% | |
| 6:15 PM | 8,906 sf | 10.22% | 38 sf | 0.04% | |
| 6:30 PM | 10,707 sf | 12.29% | 646 sf | 0.74% | |
| 6:45 PM | 13,191 sf | 15.14% | 1,973 sf | 2.26% | |
| 7:10 PM | 20,827 sf | 23.91% | 11,528 sf | 13.23% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# AUGUST 16

Mirror date: April 26
Analysis hours: 7:25 AM-7:02 PM (PDT)

Shadow / Sunlight Balance Key

Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:25 AM | 47,761 sf | 54.82% | 4,668 sf | 5.36% | |
| 7:30 AM | 41,320 sf | 47.43% | 5,845 sf | 6.71% | |
| 7:45 AM | 30,535 sf | 35.05% | 5,324 sf | 6.11% | |
| 8:00 AM | 23,646 sf | 27.14% | 4,536 sf | 5.21% | |
| 8:15 AM | 18,585 sf | 21.33% | 3,889 sf | 4.46% | |
| 8:30 AM | 14,077 sf | 16.16% | 3,376 sf | 3.88% | |
| 8:45 AM | 10,458 sf | 12.00% | 2,964 sf | 3.40% | |
| 9:00 AM | 7,514 sf | 8.62% | 2,604 sf | 2.99% | |
| 9:15 AM | 5,982 sf | 6.87% | 1,796 sf | 2.06% | |
| 9:30 AM | 5,623 sf | 6.45% | 383 sf | 0.44% | |
| 9:45 AM | 5,318 sf | 6.10% | 0 sf | 0.00% | |
| 10:00 AM | 5,027 sf | 5.77% | 0 sf | 0.00% | |
| 10:15 AM | 4,774 sf | 5.48% | 0 sf | 0.00% | |
| 10:30 AM | 4,509 sf | 5.18% | 0 sf | 0.00% | |
| 10:45 AM | 4,281 sf | 4.91% | 0 sf | 0.00% | |
| 11:00 AM | 4,052 sf | 4.65% | 0 sf | 0.00% | |
| 11:15 AM | 3,842 sf | 4.41% | 0 sf | 0.00% | |
| 11:30 AM | 3,612 sf | 4.15% | 0 sf | 0.00% | |
| 11:45 AM | 3,421 sf | 3.93% | 0 sf | 0.00% | |
| 12:00 PM | 3,203 sf | 3.68% | 0 sf | 0.00% | |
| 12:15 PM | 3,026 sf | 3.47% | 0 sf | 0.00% | |
| 12:30 PM | 2,811 sf | 3.23% | 0 sf | 0.00% | |
| 12:45 PM | 2,630 sf | 3.02% | 0 sf | 0.00% | |
| 1:00 PM | 2,394 sf | 2.75% | 0 sf | 0.00% | |
| 1:15 PM | 2,524 sf | 2.90% | 0 sf | 0.00% | |
| 1:30 PM | 2,617 sf | 3.00% | 0 sf | 0.00% | |
| 1:45 PM | 2,760 sf | 3.17% | 0 sf | 0.00% | |
| 2:00 PM | 2,850 sf | 3.27% | 0 sf | 0.00% | |
| 2:15 PM | 2,986 sf | 3.43% | 0 sf | 0.00% | |
| 2:30 PM | 3,074 sf | 3.53% | 0 sf | 0.00% | |
| 2:45 PM | 3,210 sf | 3.68% | 0 sf | 0.00% | |
| 3:00 PM | 3,298 sf | 3.79% | 0 sf | 0.00% | |
| 3:15 PM | 3,431 sf | 3.94% | 0 sf | 0.00% | |
| 3:30 PM | 3,519 sf | 4.04% | 0 sf | 0.00% | |
| 3:45 PM | 3,645 sf | 4.18% | 0 sf | 0.00% | |
| 4:00 PM | 3,749 sf | 4.30% | 0 sf | 0.00% | |
| 4:15 PM | 3,879 sf | 4.45% | 0 sf | 0.00% | |
| 4:30 PM | 3,999 sf | 4.59% | 0 sf | 0.00% | |
| 4:45 PM | 4,134 sf | 4.75% | 0 sf | 0.00% | |
| 5:00 PM | 4,283 sf | 4.92% | 0 sf | 0.00% | |
| 5:15 PM | 4,533 sf | 5.20% | 0 sf | 0.00% | |
| 5:30 PM | 5,442 sf | 6.25% | 0 sf | 0.00% | |
| 5:45 PM | 6,492 sf | 7.45% | 0 sf | 0.00% | |
| 6:00 PM | 7,765 sf | 8.91% | 81 sf | 0.09% | |
| 6:15 PM | 9,339 sf | 10.72% | 840 sf | 0.96% | |
| 6:30 PM | 11,363 sf | 13.04% | 2,115 sf | 2.43% | |
| 6:45 PM | 14,244 sf | 16.35% | 3,921 sf | 4.50% | |
| 7:02 PM | 19,740 sf | 22.66% | 11,497 sf | 13.20% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# AUGUST 23

Mirror date: April 19
Analysis hours: 7:31 AM-6:52 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:31 AM | 49,794 sf | 57.16% | 5,555 sf | 6.38% | |
| 7:45 AM | 35,845 sf | 41.14% | 5,990 sf | 6.88% | |
| 8:00 AM | 26,999 sf | 30.99% | 5,084 sf | 5.84% | |
| 8:15 AM | 21,114 sf | 24.24% | 4,292 sf | 4.93% | |
| 8:30 AM | 16,082 sf | 18.46% | 3,674 sf | 4.22% | |
| 8:45 AM | 12,020 sf | 13.80% | 3,182 sf | 3.65% | |
| 9:00 AM | 8,672 sf | 9.95% | 2,776 sf | 3.19% | |
| 9:15 AM | 6,533 sf | 7.50% | 2,192 sf | 2.52% | |
| 9:30 AM | 6,083 sf | 6.98% | 646 sf | 0.74% | |
| 9:45 AM | 5,739 sf | 6.59% | 0 sf | 0.00% | |
| 10:00 AM | 5,409 sf | 6.21% | 0 sf | 0.00% | |
| 10:15 AM | 5,131 sf | 5.89% | 0 sf | 0.00% | |
| 10:30 AM | 4,843 sf | 5.56% | 0 sf | 0.00% | |
| 10:45 AM | 4,602 sf | 5.28% | 0 sf | 0.00% | |
| 11:00 AM | 4,341 sf | 4.98% | 0 sf | 0.00% | |
| 11:15 AM | 4,132 sf | 4.74% | 0 sf | 0.00% | |
| 11:30 AM | 3,892 sf | 4.47% | 0 sf | 0.00% | |
| 11:45 AM | 3,696 sf | 4.24% | 0 sf | 0.00% | |
| 12:00 PM | 3,471 sf | 3.98% | 0 sf | 0.00% | |
| 12:15 PM | 3,284 sf | 3.77% | 0 sf | 0.00% | |
| 12:30 PM | 3,059 sf | 3.51% | 0 sf | 0.00% | |
| 12:45 PM | 2,867 sf | 3.29% | 0 sf | 0.00% | |
| 1:00 PM | 2,667 sf | 3.06% | 0 sf | 0.00% | |
| 1:15 PM | 2,825 sf | 3.24% | 0 sf | 0.00% | |
| 1:30 PM | 2,926 sf | 3.36% | 0 sf | 0.00% | |
| 1:45 PM | 3,069 sf | 3.52% | 0 sf | 0.00% | |
| 2:00 PM | 3,164 sf | 3.63% | 0 sf | 0.00% | |
| 2:15 PM | 3,304 sf | 3.79% | 0 sf | 0.00% | |
| 2:30 PM | 3,407 sf | 3.91% | 0 sf | 0.00% | |
| 2:45 PM | 3,551 sf | 4.08% | 0 sf | 0.00% | |
| 3:00 PM | 3,655 sf | 4.20% | 0 sf | 0.00% | |
| 3:15 PM | 3,794 sf | 4.35% | 0 sf | 0.00% | |
| 3:30 PM | 3,904 sf | 4.48% | 0 sf | 0.00% | |
| 3:45 PM | 4,052 sf | 4.65% | 0 sf | 0.00% | |
| 4:00 PM | 4,165 sf | 4.78% | 0 sf | 0.00% | |
| 4:15 PM | 4,327 sf | 4.97% | 0 sf | 0.00% | |
| 4:30 PM | 4,458 sf | 5.12% | 0 sf | 0.00% | |
| 4:45 PM | 4,647 sf | 5.33% | 0 sf | 0.00% | |
| 5:00 PM | 4,824 sf | 5.54% | 0 sf | 0.00% | |
| 5:15 PM | 5,061 sf | 5.81% | 0 sf | 0.00% | |
| 5:30 PM | 5,505 sf | 6.32% | 0 sf | 0.00% | |
| 5:45 PM | 6,760 sf | 7.76% | 168 sf | 0.19% | |
| 6:00 PM | 8,184 sf | 9.39% | 1,072 sf | 1.23% | |
| 6:15 PM | 9,975 sf | 11.45% | 2,417 sf | 2.77% | |
| 6:30 PM | 12,345 sf | 14.17% | 4,204 sf | 4.83% | |
| 6:45 PM | 16,012 sf | 18.38% | 7,130 sf | 8.18% | |
| 6:52 PM | 19,022 sf | 21.83% | 11,173 sf | 12.82% | |

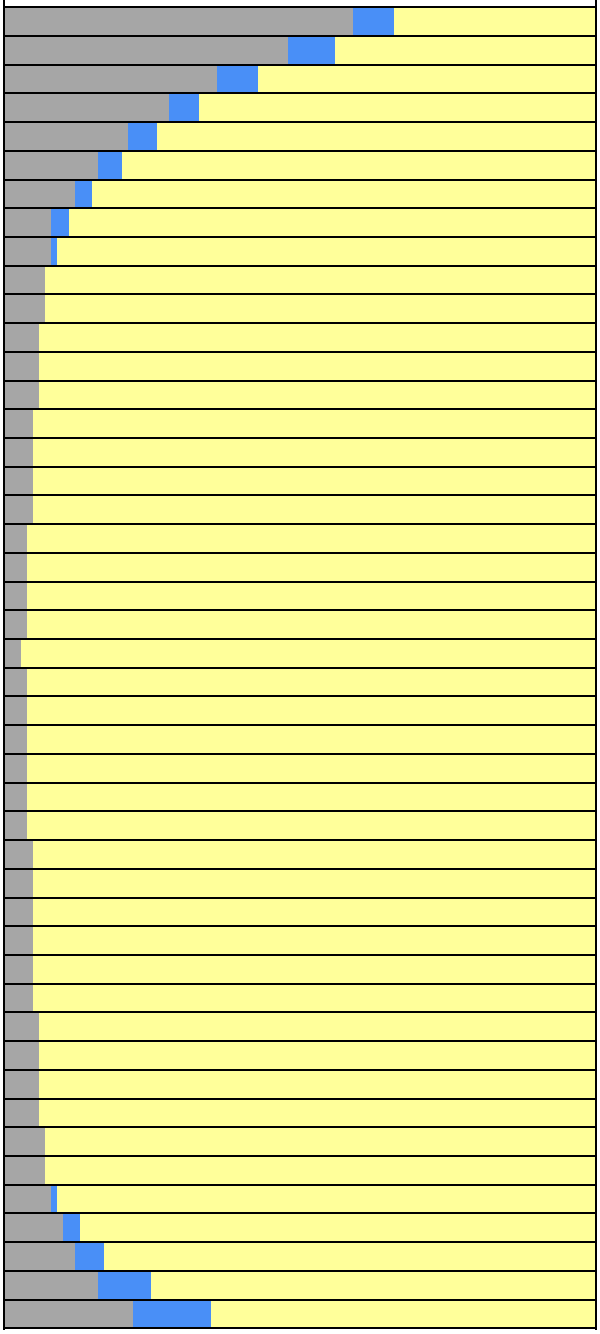
PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# AUGUST 30

Mirror date: April 12
Analysis hours: 7:37 AM-6:42 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:37 AM | 51,378 sf | 58.97% | 6,128 sf | 7.03% | |
| 7:45 AM | 42,077 sf | 48.30% | 6,569 sf | 7.54% | |
| 8:00 AM | 31,050 sf | 35.64% | 5,750 sf | 6.60% | |
| 8:15 AM | 23,975 sf | 27.52% | 4,748 sf | 5.45% | |
| 8:30 AM | 18,431 sf | 21.16% | 3,986 sf | 4.58% | |
| 8:45 AM | 13,812 sf | 15.85% | 3,398 sf | 3.90% | |
| 9:00 AM | 10,078 sf | 11.57% | 2,926 sf | 3.36% | |
| 9:15 AM | 7,344 sf | 8.43% | 2,468 sf | 2.83% | |
| 9:30 AM | 6,600 sf | 7.58% | 976 sf | 1.12% | |
| 9:45 AM | 6,204 sf | 7.12% | 0 sf | 0.00% | |
| 10:00 AM | 5,837 sf | 6.70% | 0 sf | 0.00% | |
| 10:15 AM | 5,526 sf | 6.34% | 0 sf | 0.00% | |
| 10:30 AM | 5,216 sf | 5.99% | 0 sf | 0.00% | |
| 10:45 AM | 4,950 sf | 5.68% | 0 sf | 0.00% | |
| 11:00 AM | 4,674 sf | 5.37% | 0 sf | 0.00% | |
| 11:15 AM | 4,450 sf | 5.11% | 0 sf | 0.00% | |
| 11:30 AM | 4,196 sf | 4.82% | 0 sf | 0.00% | |
| 11:45 AM | 3,989 sf | 4.58% | 0 sf | 0.00% | |
| 12:00 PM | 3,759 sf | 4.32% | 0 sf | 0.00% | |
| 12:15 PM | 3,567 sf | 4.09% | 0 sf | 0.00% | |
| 12:30 PM | 3,338 sf | 3.83% | 0 sf | 0.00% | |
| 12:45 PM | 3,147 sf | 3.61% | 0 sf | 0.00% | |
| 1:00 PM | 2,985 sf | 3.43% | 0 sf | 0.00% | |
| 1:15 PM | 3,168 sf | 3.64% | 0 sf | 0.00% | |
| 1:30 PM | 3,268 sf | 3.75% | 0 sf | 0.00% | |
| 1:45 PM | 3,418 sf | 3.92% | 0 sf | 0.00% | |
| 2:00 PM | 3,516 sf | 4.04% | 0 sf | 0.00% | |
| 2:15 PM | 3,673 sf | 4.22% | 0 sf | 0.00% | |
| 2:30 PM | 3,782 sf | 4.34% | 0 sf | 0.00% | |
| 2:45 PM | 3,934 sf | 4.52% | 0 sf | 0.00% | |
| 3:00 PM | 4,052 sf | 4.65% | 0 sf | 0.00% | |
| 3:15 PM | 4,215 sf | 4.84% | 0 sf | 0.00% | |
| 3:30 PM | 4,340 sf | 4.98% | 0 sf | 0.00% | |
| 3:45 PM | 4,507 sf | 5.17% | 0 sf | 0.00% | |
| 4:00 PM | 4,653 sf | 5.34% | 0 sf | 0.00% | |
| 4:15 PM | 4,844 sf | 5.56% | 0 sf | 0.00% | |
| 4:30 PM | 5,019 sf | 5.76% | 0 sf | 0.00% | |
| 4:45 PM | 5,239 sf | 6.01% | 0 sf | 0.00% | |
| 5:00 PM | 5,496 sf | 6.31% | 0 sf | 0.00% | |
| 5:15 PM | 5,783 sf | 6.64% | 0 sf | 0.00% | |
| 5:30 PM | 6,102 sf | 7.00% | 265 sf | 0.30% | |
| 5:45 PM | 7,111 sf | 8.16% | 1,248 sf | 1.43% | |
| 6:00 PM | 8,743 sf | 10.04% | 2,673 sf | 3.07% | |
| 6:15 PM | 10,847 sf | 12.45% | 4,619 sf | 5.30% | |
| 6:30 PM | 13,976 sf | 16.04% | 7,537 sf | 8.65% | |
| 6:42 PM | 18,780 sf | 21.56% | 10,984 sf | 12.61% | |

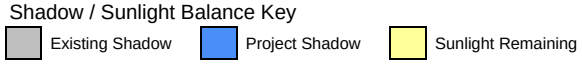


PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# SEPTEMBER 6

Mirror date: April 5
Analysis hours: 7:44 AM-6:31 PM (PDT)

Shadow / Sunlight Balance Key




| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:44 AM | 51,583 sf | 59.21% | 6,349 sf | 7.29% | |
| 8:00 AM | 35,558 sf | 40.82% | 6,199 sf | 7.12% | |
| 8:15 AM | 27,140 sf | 31.15% | 5,098 sf | 5.85% | |
| 8:30 AM | 21,004 sf | 24.11% | 4,222 sf | 4.85% | |
| 8:45 AM | 15,770 sf | 18.10% | 3,569 sf | 4.10% | |
| 9:00 AM | 11,600 sf | 13.32% | 3,055 sf | 3.51% | |
| 9:15 AM | 8,406 sf | 9.65% | 2,619 sf | 3.01% | |
| 9:30 AM | 7,169 sf | 8.23% | 1,322 sf | 1.52% | |
| 9:45 AM | 6,717 sf | 7.71% | 35 sf | 0.04% | |
| 10:00 AM | 6,300 sf | 7.23% | 0 sf | 0.00% | |
| 10:15 AM | 5,963 sf | 6.84% | 0 sf | 0.00% | |
| 10:30 AM | 5,617 sf | 6.45% | 0 sf | 0.00% | |
| 10:45 AM | 5,334 sf | 6.12% | 0 sf | 0.00% | |
| 11:00 AM | 5,043 sf | 5.79% | 0 sf | 0.00% | |
| 11:15 AM | 4,802 sf | 5.51% | 0 sf | 0.00% | |
| 11:30 AM | 4,538 sf | 5.21% | 0 sf | 0.00% | |
| 11:45 AM | 4,315 sf | 4.95% | 0 sf | 0.00% | |
| 12:00 PM | 4,074 sf | 4.68% | 0 sf | 0.00% | |
| 12:15 PM | 3,874 sf | 4.45% | 0 sf | 0.00% | |
| 12:30 PM | 3,640 sf | 4.18% | 0 sf | 0.00% | |
| 12:45 PM | 3,403 sf | 3.91% | 0 sf | 0.00% | |
| 1:00 PM | 3,367 sf | 3.86% | 0 sf | 0.00% | |
| 1:15 PM | 3,544 sf | 4.07% | 0 sf | 0.00% | |
| 1:30 PM | 3,646 sf | 4.18% | 0 sf | 0.00% | |
| 1:45 PM | 3,800 sf | 4.36% | 0 sf | 0.00% | |
| 2:00 PM | 3,913 sf | 4.49% | 0 sf | 0.00% | |
| 2:15 PM | 4,072 sf | 4.67% | 0 sf | 0.00% | |
| 2:30 PM | 4,193 sf | 4.81% | 0 sf | 0.00% | |
| 2:45 PM | 4,370 sf | 5.02% | 0 sf | 0.00% | |
| 3:00 PM | 4,501 sf | 5.17% | 0 sf | 0.00% | |
| 3:15 PM | 4,683 sf | 5.37% | 0 sf | 0.00% | |
| 3:30 PM | 4,830 sf | 5.54% | 0 sf | 0.00% | |
| 3:45 PM | 5,036 sf | 5.78% | 0 sf | 0.00% | |
| 4:00 PM | 5,217 sf | 5.99% | 0 sf | 0.00% | |
| 4:15 PM | 5,444 sf | 6.25% | 0 sf | 0.00% | |
| 4:30 PM | 5,666 sf | 6.50% | 0 sf | 0.00% | |
| 4:45 PM | 5,950 sf | 6.83% | 0 sf | 0.00% | |
| 5:00 PM | 6,254 sf | 7.18% | 0 sf | 0.00% | |
| 5:15 PM | 6,630 sf | 7.61% | 396 sf | 0.45% | |
| 5:30 PM | 7,134 sf | 8.19% | 1,335 sf | 1.53% | |
| 5:45 PM | 7,737 sf | 8.88% | 2,848 sf | 3.27% | |
| 6:00 PM | 9,498 sf | 10.90% | 4,921 sf | 5.65% | |
| 6:15 PM | 12,376 sf | 14.21% | 8,246 sf | 9.46% | |
| 6:31 PM | 18,770 sf | 21.54% | 13,560 sf | 15.56% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# SEPTEMBER 13

Mirror date: March 29
Analysis hours: 7:50 AM-6:21 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:50 AM | 50,273 sf | 57.71% | 6,355 sf | 7.29% | |
| 8:00 AM | 39,499 sf | 45.34% | 6,482 sf | 7.44% | |
| 8:15 AM | 29,502 sf | 33.86% | 5,471 sf | 6.28% | |
| 8:30 AM | 22,804 sf | 26.18% | 4,477 sf | 5.14% | |
| 8:45 AM | 17,204 sf | 19.75% | 3,746 sf | 4.30% | |
| 9:00 AM | 12,773 sf | 14.66% | 3,183 sf | 3.65% | |
| 9:15 AM | 9,286 sf | 10.66% | 2,730 sf | 3.13% | |
| 9:30 AM | 7,542 sf | 8.66% | 1,693 sf | 1.94% | |
| 9:45 AM | 7,088 sf | 8.14% | 170 sf | 0.19% | |
| 10:00 AM | 6,704 sf | 7.69% | 0 sf | 0.00% | |
| 10:15 AM | 6,361 sf | 7.30% | 0 sf | 0.00% | |
| 10:30 AM | 6,063 sf | 6.96% | 0 sf | 0.00% | |
| 10:45 AM | 5,761 sf | 6.61% | 0 sf | 0.00% | |
| 11:00 AM | 5,448 sf | 6.25% | 0 sf | 0.00% | |
| 11:15 AM | 5,181 sf | 5.95% | 0 sf | 0.00% | |
| 11:30 AM | 4,898 sf | 5.62% | 0 sf | 0.00% | |
| 11:45 AM | 4,672 sf | 5.36% | 0 sf | 0.00% | |
| 12:00 PM | 4,420 sf | 5.07% | 0 sf | 0.00% | |
| 12:15 PM | 4,214 sf | 4.84% | 0 sf | 0.00% | |
| 12:30 PM | 3,970 sf | 4.56% | 0 sf | 0.00% | |
| 12:45 PM | 3,751 sf | 4.31% | 0 sf | 0.00% | |
| 1:00 PM | 3,791 sf | 4.35% | 0 sf | 0.00% | |
| 1:15 PM | 3,956 sf | 4.54% | 0 sf | 0.00% | |
| 1:30 PM | 4,063 sf | 4.66% | 0 sf | 0.00% | |
| 1:45 PM | 4,226 sf | 4.85% | 0 sf | 0.00% | |
| 2:00 PM | 4,346 sf | 4.99% | 0 sf | 0.00% | |
| 2:15 PM | 4,524 sf | 5.19% | 0 sf | 0.00% | |
| 2:30 PM | 4,658 sf | 5.35% | 0 sf | 0.00% | |
| 2:45 PM | 4,847 sf | 5.56% | 0 sf | 0.00% | |
| 3:00 PM | 5,003 sf | 5.74% | 0 sf | 0.00% | |
| 3:15 PM | 5,213 sf | 5.98% | 0 sf | 0.00% | |
| 3:30 PM | 5,394 sf | 6.19% | 0 sf | 0.00% | |
| 3:45 PM | 5,629 sf | 6.46% | 0 sf | 0.00% | |
| 4:00 PM | 5,852 sf | 6.72% | 0 sf | 0.00% | |
| 4:15 PM | 6,139 sf | 7.05% | 0 sf | 0.00% | |
| 4:30 PM | 6,418 sf | 7.37% | 0 sf | 0.00% | |
| 4:45 PM | 6,788 sf | 7.79% | 36 sf | 0.04% | |
| 5:00 PM | 7,188 sf | 8.25% | 518 sf | 0.59% | |
| 5:15 PM | 7,717 sf | 8.86% | 1,419 sf | 1.63% | |
| 5:30 PM | 8,362 sf | 9.60% | 2,769 sf | 3.18% | |
| 5:45 PM | 9,273 sf | 10.64% | 5,045 sf | 5.79% | |
| 6:00 PM | 10,898 sf | 12.51% | 8,608 sf | 9.88% | |
| 6:15 PM | 16,029 sf | 18.40% | 13,134 sf | 15.08% | |
| 6:21 PM | 18,876 sf | 21.67% | 16,664 sf | 19.13% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# SEPTEMBER 20

Fall equinox (Spring equinox on March 22 similar)
Analysis hours: 7:57 AM-6:09 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:57 AM | 48,971 sf | 56.21% | 6,393 sf | 7.34% | |
| 8:00 AM | 44,700 sf | 51.31% | 6,801 sf | 7.81% | |
| 8:15 AM | 32,008 sf | 36.74% | 5,865 sf | 6.73% | |
| 8:30 AM | 24,397 sf | 28.00% | 4,773 sf | 5.48% | |
| 8:45 AM | 18,510 sf | 21.25% | 3,953 sf | 4.54% | |
| 9:00 AM | 13,724 sf | 15.75% | 3,317 sf | 3.81% | |
| 9:15 AM | 9,958 sf | 11.43% | 2,829 sf | 3.25% | |
| 9:30 AM | 7,589 sf | 8.71% | 2,092 sf | 2.40% | |
| 9:45 AM | 7,131 sf | 8.19% | 396 sf | 0.45% | |
| 10:00 AM | 6,763 sf | 7.76% | 0 sf | 0.00% | |
| 10:15 AM | 6,427 sf | 7.38% | 0 sf | 0.00% | |
| 10:30 AM | 6,131 sf | 7.04% | 0 sf | 0.00% | |
| 10:45 AM | 5,854 sf | 6.72% | 0 sf | 0.00% | |
| 11:00 AM | 5,600 sf | 6.43% | 0 sf | 0.00% | |
| 11:15 AM | 5,362 sf | 6.15% | 0 sf | 0.00% | |
| 11:30 AM | 5,141 sf | 5.90% | 0 sf | 0.00% | |
| 11:45 AM | 4,939 sf | 5.67% | 0 sf | 0.00% | |
| 12:00 PM | 4,746 sf | 5.45% | 0 sf | 0.00% | |
| 12:15 PM | 4,570 sf | 5.25% | 0 sf | 0.00% | |
| 12:30 PM | 4,334 sf | 4.97% | 0 sf | 0.00% | |
| 12:45 PM | 4,138 sf | 4.75% | 0 sf | 0.00% | |
| 1:00 PM | 4,241 sf | 4.87% | 0 sf | 0.00% | |
| 1:15 PM | 4,404 sf | 5.06% | 0 sf | 0.00% | |
| 1:30 PM | 4,516 sf | 5.18% | 0 sf | 0.00% | |
| 1:45 PM | 4,690 sf | 5.38% | 0 sf | 0.00% | |
| 2:00 PM | 4,822 sf | 5.54% | 0 sf | 0.00% | |
| 2:15 PM | 5,015 sf | 5.76% | 0 sf | 0.00% | |
| 2:30 PM | 5,166 sf | 5.93% | 0 sf | 0.00% | |
| 2:45 PM | 5,381 sf | 6.18% | 0 sf | 0.00% | |
| 3:00 PM | 5,564 sf | 6.39% | 0 sf | 0.00% | |
| 3:15 PM | 5,805 sf | 6.66% | 0 sf | 0.00% | |
| 3:30 PM | 6,023 sf | 6.91% | 0 sf | 0.00% | |
| 3:45 PM | 6,309 sf | 7.24% | 0 sf | 0.00% | |
| 4:00 PM | 6,577 sf | 7.55% | 0 sf | 0.00% | |
| 4:15 PM | 6,934 sf | 7.96% | 0 sf | 0.00% | |
| 4:30 PM | 7,307 sf | 8.39% | 99 sf | 0.11% | |
| 4:45 PM | 7,784 sf | 8.93% | 546 sf | 0.63% | |
| 5:00 PM | 8,321 sf | 9.55% | 1,360 sf | 1.56% | |
| 5:15 PM | 9,028 sf | 10.36% | 2,637 sf | 3.03% | |
| 5:30 PM | 9,912 sf | 11.38% | 4,651 sf | 5.34% | |
| 5:45 PM | 11,638 sf | 13.36% | 8,117 sf | 9.32% | |
| 6:00 PM | 15,343 sf | 17.61% | 13,814 sf | 15.86% | |
| 6:09 PM | 19,013 sf | 21.82% | 20,103 sf | 23.08% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# SEPTEMBER 27

Mirror date: March 15
Analysis hours: 8:03 AM-5:58 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 8:03 AM | 47,524 sf | 54.55% | 6,398 sf | 7.34% | |
| 8:15 AM | 35,019 sf | 40.20% | 6,254 sf | 7.18% | |
| 8:30 AM | 26,112 sf | 29.97% | 5,127 sf | 5.89% | |
| 8:45 AM | 19,923 sf | 22.87% | 4,186 sf | 4.80% | |
| 9:00 AM | 14,724 sf | 16.90% | 3,480 sf | 3.99% | |
| 9:15 AM | 10,705 sf | 12.29% | 2,948 sf | 3.38% | |
| 9:30 AM | 7,691 sf | 8.83% | 2,458 sf | 2.82% | |
| 9:45 AM | 7,111 sf | 8.16% | 685 sf | 0.79% | |
| 10:00 AM | 6,725 sf | 7.72% | 0 sf | 0.00% | |
| 10:15 AM | 6,401 sf | 7.35% | 0 sf | 0.00% | |
| 10:30 AM | 6,116 sf | 7.02% | 0 sf | 0.00% | |
| 10:45 AM | 5,852 sf | 6.72% | 0 sf | 0.00% | |
| 11:00 AM | 5,614 sf | 6.44% | 0 sf | 0.00% | |
| 11:15 AM | 5,384 sf | 6.18% | 0 sf | 0.00% | |
| 11:30 AM | 5,178 sf | 5.94% | 0 sf | 0.00% | |
| 11:45 AM | 4,985 sf | 5.72% | 0 sf | 0.00% | |
| 12:00 PM | 4,796 sf | 5.51% | 0 sf | 0.00% | |
| 12:15 PM | 4,613 sf | 5.30% | 0 sf | 0.00% | |
| 12:30 PM | 4,431 sf | 5.09% | 0 sf | 0.00% | |
| 12:45 PM | 4,341 sf | 4.98% | 0 sf | 0.00% | |
| 1:00 PM | 4,541 sf | 5.21% | 0 sf | 0.00% | |
| 1:15 PM | 4,738 sf | 5.44% | 0 sf | 0.00% | |
| 1:30 PM | 4,926 sf | 5.65% | 0 sf | 0.00% | |
| 1:45 PM | 5,135 sf | 5.89% | 0 sf | 0.00% | |
| 2:00 PM | 5,340 sf | 6.13% | 0 sf | 0.00% | |
| 2:15 PM | 5,552 sf | 6.37% | 0 sf | 0.00% | |
| 2:30 PM | 5,727 sf | 6.57% | 0 sf | 0.00% | |
| 2:45 PM | 5,966 sf | 6.85% | 0 sf | 0.00% | |
| 3:00 PM | 6,182 sf | 7.10% | 0 sf | 0.00% | |
| 3:15 PM | 6,460 sf | 7.42% | 0 sf | 0.00% | |
| 3:30 PM | 6,727 sf | 7.72% | 0 sf | 0.00% | |
| 3:45 PM | 7,066 sf | 8.11% | 0 sf | 0.00% | |
| 4:00 PM | 7,407 sf | 8.50% | 0 sf | 0.00% | |
| 4:15 PM | 7,852 sf | 9.01% | 143 sf | 0.16% | |
| 4:30 PM | 8,332 sf | 9.56% | 511 sf | 0.59% | |
| 4:45 PM | 8,956 sf | 10.28% | 1,221 sf | 1.40% | |
| 5:00 PM | 9,677 sf | 11.11% | 2,395 sf | 2.75% | |
| 5:15 PM | 10,670 sf | 12.25% | 4,275 sf | 4.91% | |
| 5:30 PM | 12,408 sf | 14.24% | 7,222 sf | 8.29% | |
| 5:45 PM | 15,944 sf | 18.30% | 12,848 sf | 14.75% | |
| 5:58 PM | 21,172 sf | 24.30% | 22,202 sf | 25.48% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# OCTOBER 4

Mirror date: March 8
Analysis hours: 8:09 AM-5:47 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 8:09 AM | 46,677 sf | 53.58% | 6,434 sf | 7.39% | |
| 8:15 AM | 40,180 sf | 46.12% | 6,501 sf | 7.46% | |
| 8:30 AM | 28,410 sf | 32.61% | 5,559 sf | 6.38% | |
| 8:45 AM | 21,439 sf | 24.61% | 4,472 sf | 5.13% | |
| 9:00 AM | 15,853 sf | 18.20% | 3,693 sf | 4.24% | |
| 9:15 AM | 11,527 sf | 13.23% | 3,094 sf | 3.55% | |
| 9:30 AM | 8,163 sf | 9.37% | 2,599 sf | 2.98% | |
| 9:45 AM | 7,075 sf | 8.12% | 1,070 sf | 1.23% | |
| 10:00 AM | 6,698 sf | 7.69% | 0 sf | 0.00% | |
| 10:15 AM | 6,372 sf | 7.31% | 0 sf | 0.00% | |
| 10:30 AM | 6,088 sf | 6.99% | 0 sf | 0.00% | |
| 10:45 AM | 5,824 sf | 6.69% | 0 sf | 0.00% | |
| 11:00 AM | 5,583 sf | 6.41% | 0 sf | 0.00% | |
| 11:15 AM | 5,360 sf | 6.15% | 0 sf | 0.00% | |
| 11:30 AM | 5,154 sf | 5.92% | 0 sf | 0.00% | |
| 11:45 AM | 4,957 sf | 5.69% | 0 sf | 0.00% | |
| 12:00 PM | 4,789 sf | 5.50% | 0 sf | 0.00% | |
| 12:15 PM | 4,620 sf | 5.30% | 0 sf | 0.00% | |
| 12:30 PM | 4,443 sf | 5.10% | 0 sf | 0.00% | |
| 12:45 PM | 4,424 sf | 5.08% | 0 sf | 0.00% | |
| 1:00 PM | 4,643 sf | 5.33% | 0 sf | 0.00% | |
| 1:15 PM | 4,875 sf | 5.60% | 0 sf | 0.00% | |
| 1:30 PM | 5,088 sf | 5.84% | 0 sf | 0.00% | |
| 1:45 PM | 5,312 sf | 6.10% | 0 sf | 0.00% | |
| 2:00 PM | 5,537 sf | 6.36% | 0 sf | 0.00% | |
| 2:15 PM | 5,795 sf | 6.65% | 0 sf | 0.00% | |
| 2:30 PM | 6,050 sf | 6.94% | 0 sf | 0.00% | |
| 2:45 PM | 6,350 sf | 7.29% | 0 sf | 0.00% | |
| 3:00 PM | 6,654 sf | 7.64% | 0 sf | 0.00% | |
| 3:15 PM | 7,007 sf | 8.04% | 0 sf | 0.00% | |
| 3:30 PM | 7,384 sf | 8.48% | 0 sf | 0.00% | |
| 3:45 PM | 7,820 sf | 8.98% | 0 sf | 0.00% | |
| 4:00 PM | 8,307 sf | 9.53% | 119 sf | 0.14% | |
| 4:15 PM | 8,892 sf | 10.21% | 440 sf | 0.51% | |
| 4:30 PM | 9,517 sf | 10.92% | 1,000 sf | 1.15% | |
| 4:45 PM | 10,337 sf | 11.87% | 2,078 sf | 2.38% | |
| 5:00 PM | 11,321 sf | 12.99% | 3,797 sf | 4.36% | |
| 5:15 PM | 13,160 sf | 15.11% | 6,402 sf | 7.35% | |
| 5:30 PM | 16,396 sf | 18.82% | 11,567 sf | 13.28% | |
| 5:47 PM | 23,202 sf | 26.63% | 23,546 sf | 27.03% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# OCTOBER 11

Mirror date: March 1
Analysis hours: 8:16 AM-5:37 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 8:16 AM | 47,593 sf | 54.63% | 6,445 sf | 7.40% | |
| 8:30 AM | 31,988 sf | 36.72% | 5,996 sf | 6.88% | |
| 8:45 AM | 23,183 sf | 26.61% | 4,817 sf | 5.53% | |
| 9:00 AM | 17,155 sf | 19.69% | 3,926 sf | 4.51% | |
| 9:15 AM | 12,468 sf | 14.31% | 3,266 sf | 3.75% | |
| 9:30 AM | 8,774 sf | 10.07% | 2,746 sf | 3.15% | |
| 9:45 AM | 7,044 sf | 8.09% | 1,531 sf | 1.76% | |
| 10:00 AM | 6,662 sf | 7.65% | 24 sf | 0.03% | |
| 10:15 AM | 6,337 sf | 7.27% | 0 sf | 0.00% | |
| 10:30 AM | 6,058 sf | 6.95% | 0 sf | 0.00% | |
| 10:45 AM | 5,801 sf | 6.66% | 0 sf | 0.00% | |
| 11:00 AM | 5,559 sf | 6.38% | 0 sf | 0.00% | |
| 11:15 AM | 5,335 sf | 6.12% | 0 sf | 0.00% | |
| 11:30 AM | 5,131 sf | 5.89% | 0 sf | 0.00% | |
| 11:45 AM | 4,938 sf | 5.67% | 0 sf | 0.00% | |
| 12:00 PM | 4,769 sf | 5.47% | 0 sf | 0.00% | |
| 12:15 PM | 4,596 sf | 5.28% | 0 sf | 0.00% | |
| 12:30 PM | 4,406 sf | 5.06% | 0 sf | 0.00% | |
| 12:45 PM | 4,524 sf | 5.19% | 0 sf | 0.00% | |
| 1:00 PM | 4,743 sf | 5.44% | 0 sf | 0.00% | |
| 1:15 PM | 4,969 sf | 5.70% | 0 sf | 0.00% | |
| 1:30 PM | 5,188 sf | 5.96% | 0 sf | 0.00% | |
| 1:45 PM | 5,424 sf | 6.23% | 0 sf | 0.00% | |
| 2:00 PM | 5,675 sf | 6.51% | 0 sf | 0.00% | |
| 2:15 PM | 5,950 sf | 6.83% | 0 sf | 0.00% | |
| 2:30 PM | 6,247 sf | 7.17% | 0 sf | 0.00% | |
| 2:45 PM | 6,560 sf | 7.53% | 0 sf | 0.00% | |
| 3:00 PM | 6,900 sf | 7.92% | 0 sf | 0.00% | |
| 3:15 PM | 7,286 sf | 8.36% | 0 sf | 0.00% | |
| 3:30 PM | 7,703 sf | 8.84% | 1 sf | 0.00% | |
| 3:45 PM | 8,189 sf | 9.40% | 73 sf | 0.08% | |
| 4:00 PM | 8,745 sf | 10.04% | 319 sf | 0.37% | |
| 4:15 PM | 9,415 sf | 10.81% | 762 sf | 0.87% | |
| 4:30 PM | 10,214 sf | 11.72% | 1,657 sf | 1.90% | |
| 4:45 PM | 11,226 sf | 12.89% | 3,291 sf | 3.78% | |
| 5:00 PM | 12,880 sf | 14.78% | 5,580 sf | 6.41% | |
| 5:15 PM | 15,792 sf | 18.13% | 10,343 sf | 11.87% | |
| 5:30 PM | 20,669 sf | 23.72% | 18,729 sf | 21.50% | |
| 5:37 PM | 24,126 sf | 27.69% | 23,682 sf | 27.18% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# OCTOBER 18

Mirror date: February 22
Analysis hours: 8:22 AM-5:27 PM (PDT)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 8:22 AM | 49,356 sf | 56.65% | 6,407 sf | 7.35% | |
| 8:30 AM | 39,444 sf | 45.28% | 6,313 sf | 7.25% | |
| 8:45 AM | 26,211 sf | 30.09% | 5,247 sf | 6.02% | |
| 9:00 AM | 18,682 sf | 21.44% | 4,215 sf | 4.84% | |
| 9:15 AM | 13,562 sf | 15.57% | 3,469 sf | 3.98% | |
| 9:30 AM | 9,551 sf | 10.96% | 2,890 sf | 3.32% | |
| 9:45 AM | 7,027 sf | 8.07% | 2,062 sf | 2.37% | |
| 10:00 AM | 6,625 sf | 7.60% | 188 sf | 0.22% | |
| 10:15 AM | 6,299 sf | 7.23% | 0 sf | 0.00% | |
| 10:30 AM | 6,024 sf | 6.91% | 0 sf | 0.00% | |
| 10:45 AM | 5,767 sf | 6.62% | 0 sf | 0.00% | |
| 11:00 AM | 5,537 sf | 6.36% | 0 sf | 0.00% | |
| 11:15 AM | 5,315 sf | 6.10% | 0 sf | 0.00% | |
| 11:30 AM | 5,111 sf | 5.87% | 0 sf | 0.00% | |
| 11:45 AM | 4,923 sf | 5.65% | 0 sf | 0.00% | |
| 12:00 PM | 4,755 sf | 5.46% | 0 sf | 0.00% | |
| 12:15 PM | 4,595 sf | 5.27% | 0 sf | 0.00% | |
| 12:30 PM | 4,416 sf | 5.07% | 0 sf | 0.00% | |
| 12:45 PM | 4,591 sf | 5.27% | 0 sf | 0.00% | |
| 1:00 PM | 4,820 sf | 5.53% | 0 sf | 0.00% | |
| 1:15 PM | 5,051 sf | 5.80% | 0 sf | 0.00% | |
| 1:30 PM | 5,281 sf | 6.06% | 0 sf | 0.00% | |
| 1:45 PM | 5,528 sf | 6.35% | 0 sf | 0.00% | |
| 2:00 PM | 5,787 sf | 6.64% | 0 sf | 0.00% | |
| 2:15 PM | 6,079 sf | 6.98% | 0 sf | 0.00% | |
| 2:30 PM | 6,391 sf | 7.34% | 0 sf | 0.00% | |
| 2:45 PM | 6,728 sf | 7.72% | 0 sf | 0.00% | |
| 3:00 PM | 7,097 sf | 8.15% | 0 sf | 0.00% | |
| 3:15 PM | 7,511 sf | 8.62% | 0 sf | 0.00% | |
| 3:30 PM | 7,978 sf | 9.16% | 15 sf | 0.02% | |
| 3:45 PM | 8,511 sf | 9.77% | 190 sf | 0.22% | |
| 4:00 PM | 9,128 sf | 10.48% | 492 sf | 0.57% | |
| 4:15 PM | 9,887 sf | 11.35% | 1,215 sf | 1.39% | |
| 4:30 PM | 10,804 sf | 12.40% | 2,651 sf | 3.04% | |
| 4:45 PM | 12,255 sf | 14.07% | 4,803 sf | 5.51% | |
| 5:00 PM | 14,625 sf | 16.79% | 8,955 sf | 10.28% | |
| 5:15 PM | 18,254 sf | 20.95% | 15,624 sf | 17.93% | |
| 5:27 PM | 24,202 sf | 27.78% | 22,907 sf | 26.29% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# OCTOBER 25

Mirror date: February 15
Analysis hours: 7:30 AM-4:18 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:30 AM | 51,336 sf | 58.93% | 5,893 sf | 6.76% | |
| 7:45 AM | 32,576 sf | 37.39% | 5,790 sf | 6.65% | |
| 8:00 AM | 21,547 sf | 24.73% | 4,568 sf | 5.24% | |
| 8:15 AM | 14,922 sf | 17.13% | 3,712 sf | 4.26% | |
| 8:30 AM | 10,530 sf | 12.09% | 3,061 sf | 3.51% | |
| 8:45 AM | 7,289 sf | 8.37% | 2,511 sf | 2.88% | |
| 9:00 AM | 6,606 sf | 7.58% | 571 sf | 0.66% | |
| 9:15 AM | 6,272 sf | 7.20% | 0 sf | 0.00% | |
| 9:30 AM | 6,002 sf | 6.89% | 0 sf | 0.00% | |
| 9:45 AM | 5,744 sf | 6.59% | 0 sf | 0.00% | |
| 10:00 AM | 5,513 sf | 6.33% | 0 sf | 0.00% | |
| 10:15 AM | 5,299 sf | 6.08% | 0 sf | 0.00% | |
| 10:30 AM | 5,090 sf | 5.84% | 0 sf | 0.00% | |
| 10:45 AM | 4,910 sf | 5.64% | 0 sf | 0.00% | |
| 11:00 AM | 4,749 sf | 5.45% | 0 sf | 0.00% | |
| 11:15 AM | 4,593 sf | 5.27% | 0 sf | 0.00% | |
| 11:30 AM | 4,439 sf | 5.10% | 0 sf | 0.00% | |
| 11:45 AM | 4,654 sf | 5.34% | 0 sf | 0.00% | |
| 12:00 PM | 4,885 sf | 5.61% | 0 sf | 0.00% | |
| 12:15 PM | 5,128 sf | 5.89% | 0 sf | 0.00% | |
| 12:30 PM | 5,367 sf | 6.16% | 0 sf | 0.00% | |
| 12:45 PM | 5,624 sf | 6.46% | 0 sf | 0.00% | |
| 1:00 PM | 5,896 sf | 6.77% | 0 sf | 0.00% | |
| 1:15 PM | 6,202 sf | 7.12% | 0 sf | 0.00% | |
| 1:30 PM | 6,528 sf | 7.49% | 0 sf | 0.00% | |
| 1:45 PM | 6,893 sf | 7.91% | 0 sf | 0.00% | |
| 2:00 PM | 7,282 sf | 8.36% | 0 sf | 0.00% | |
| 2:15 PM | 7,731 sf | 8.87% | 0 sf | 0.00% | |
| 2:30 PM | 8,229 sf | 9.45% | 97 sf | 0.11% | |
| 2:45 PM | 8,819 sf | 10.12% | 291 sf | 0.33% | |
| 3:00 PM | 9,500 sf | 10.90% | 715 sf | 0.82% | |
| 3:15 PM | 10,350 sf | 11.88% | 1,914 sf | 2.20% | |
| 3:30 PM | 11,536 sf | 13.24% | 3,813 sf | 4.38% | |
| 3:45 PM | 13,493 sf | 15.49% | 7,533 sf | 8.65% | |
| 4:00 PM | 16,681 sf | 19.15% | 13,991 sf | 16.06% | |
| 4:15 PM | 22,420 sf | 25.73% | 20,793 sf | 23.87% | |
| 4:18 PM | 24,096 sf | 27.66% | 21,706 sf | 24.92% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# NOVEMBER 1

Mirror date: February 8
Analysis hours: 7:36 AM-4:10 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

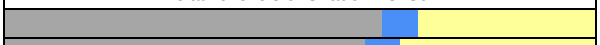
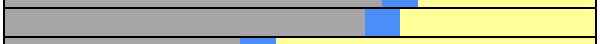
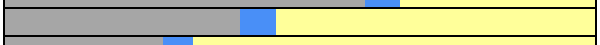
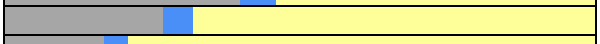
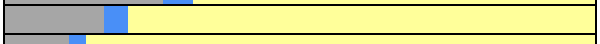
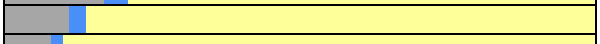
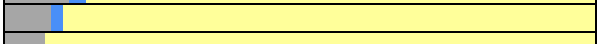
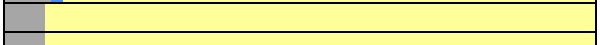
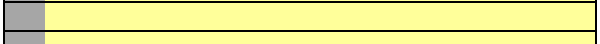
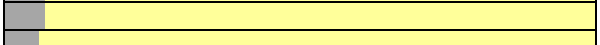
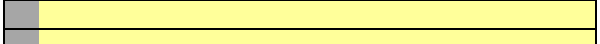
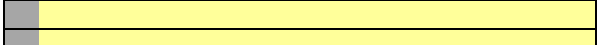
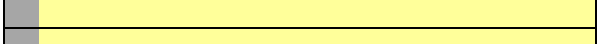
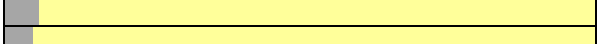
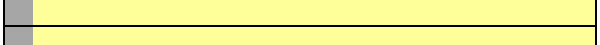
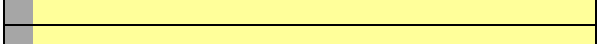
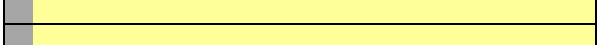
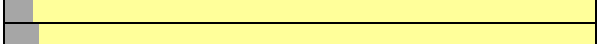
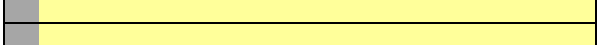
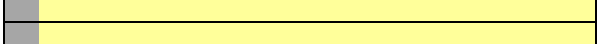
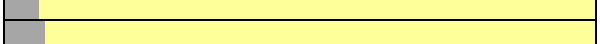
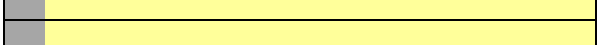
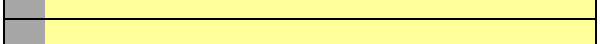
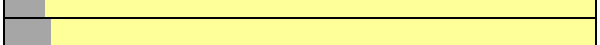
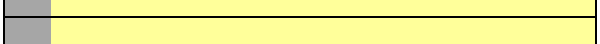
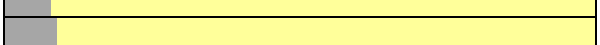
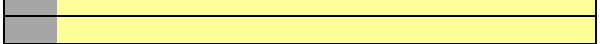
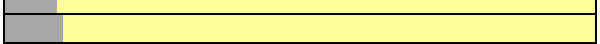
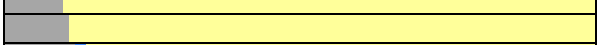
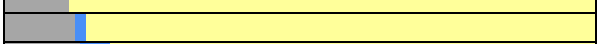
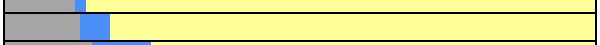
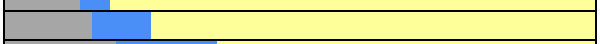
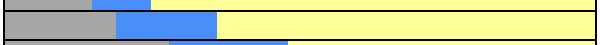
| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:36 AM | 53,393 sf | 61.29% | 5,303 sf | 6.09% | |
| 7:45 AM | 41,612 sf | 47.76% | 5,811 sf | 6.67% | |
| 8:00 AM | 27,149 sf | 31.16% | 5,000 sf | 5.74% | |
| 8:15 AM | 17,945 sf | 20.60% | 4,002 sf | 4.59% | |
| 8:30 AM | 11,806 sf | 13.55% | 3,269 sf | 3.75% | |
| 8:45 AM | 8,030 sf | 9.22% | 2,706 sf | 3.11% | |
| 9:00 AM | 6,601 sf | 7.58% | 1,129 sf | 1.30% | |
| 9:15 AM | 6,254 sf | 7.18% | 0 sf | 0.00% | |
| 9:30 AM | 5,977 sf | 6.86% | 0 sf | 0.00% | |
| 9:45 AM | 5,727 sf | 6.57% | 0 sf | 0.00% | |
| 10:00 AM | 5,495 sf | 6.31% | 0 sf | 0.00% | |
| 10:15 AM | 5,284 sf | 6.06% | 0 sf | 0.00% | |
| 10:30 AM | 5,080 sf | 5.83% | 0 sf | 0.00% | |
| 10:45 AM | 4,898 sf | 5.62% | 0 sf | 0.00% | |
| 11:00 AM | 4,748 sf | 5.45% | 0 sf | 0.00% | |
| 11:15 AM | 4,591 sf | 5.27% | 0 sf | 0.00% | |
| 11:30 AM | 4,485 sf | 5.15% | 0 sf | 0.00% | |
| 11:45 AM | 4,705 sf | 5.40% | 0 sf | 0.00% | |
| 12:00 PM | 4,947 sf | 5.68% | 0 sf | 0.00% | |
| 12:15 PM | 5,195 sf | 5.96% | 0 sf | 0.00% | |
| 12:30 PM | 5,445 sf | 6.25% | 0 sf | 0.00% | |
| 12:45 PM | 5,714 sf | 6.56% | 0 sf | 0.00% | |
| 1:00 PM | 5,988 sf | 6.87% | 0 sf | 0.00% | |
| 1:15 PM | 6,314 sf | 7.25% | 0 sf | 0.00% | |
| 1:30 PM | 6,654 sf | 7.64% | 0 sf | 0.00% | |
| 1:45 PM | 7,036 sf | 8.08% | 0 sf | 0.00% | |
| 2:00 PM | 7,451 sf | 8.55% | 0 sf | 0.00% | |
| 2:15 PM | 7,934 sf | 9.11% | 28 sf | 0.03% | |
| 2:30 PM | 8,468 sf | 9.72% | 119 sf | 0.14% | |
| 2:45 PM | 9,107 sf | 10.45% | 266 sf | 0.31% | |
| 3:00 PM | 9,853 sf | 11.31% | 1,111 sf | 1.27% | |
| 3:15 PM | 10,863 sf | 12.47% | 2,800 sf | 3.21% | |
| 3:30 PM | 12,362 sf | 14.19% | 5,846 sf | 6.71% | |
| 3:45 PM | 14,775 sf | 16.96% | 11,579 sf | 13.29% | |
| 4:00 PM | 19,191 sf | 22.03% | 17,790 sf | 20.42% | |
| 4:10 PM | 24,483 sf | 28.10% | 19,556 sf | 22.45% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# NOVEMBER 8

Mirror date: February 1
Analysis hours: 7:43 AM-4:03 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:43 AM | 55,430 sf | 63.63% | 4,886 sf | 5.61% |  |
| 7:45 AM | 53,511 sf | 61.42% | 5,070 sf | 5.82% |  |
| 8:00 AM | 34,979 sf | 40.15% | 5,259 sf | 6.04% |  |
| 8:15 AM | 23,271 sf | 26.71% | 4,374 sf | 5.02% |  |
| 8:30 AM | 14,809 sf | 17.00% | 3,524 sf | 4.05% |  |
| 8:45 AM | 9,424 sf | 10.82% | 2,883 sf | 3.31% |  |
| 9:00 AM | 6,613 sf | 7.59% | 1,811 sf | 2.08% |  |
| 9:15 AM | 6,252 sf | 7.18% | 25 sf | 0.03% |  |
| 9:30 AM | 5,968 sf | 6.85% | 0 sf | 0.00% |  |
| 9:45 AM | 5,720 sf | 6.57% | 0 sf | 0.00% |  |
| 10:00 AM | 5,492 sf | 6.30% | 0 sf | 0.00% |  |
| 10:15 AM | 5,276 sf | 6.06% | 0 sf | 0.00% |  |
| 10:30 AM | 5,077 sf | 5.83% | 0 sf | 0.00% |  |
| 10:45 AM | 4,901 sf | 5.63% | 0 sf | 0.00% |  |
| 11:00 AM | 4,755 sf | 5.46% | 0 sf | 0.00% |  |
| 11:15 AM | 4,604 sf | 5.28% | 0 sf | 0.00% |  |
| 11:30 AM | 4,514 sf | 5.18% | 0 sf | 0.00% |  |
| 11:45 AM | 4,744 sf | 5.45% | 0 sf | 0.00% |  |
| 12:00 PM | 4,994 sf | 5.73% | 0 sf | 0.00% |  |
| 12:15 PM | 5,251 sf | 6.03% | 0 sf | 0.00% |  |
| 12:30 PM | 5,503 sf | 6.32% | 0 sf | 0.00% |  |
| 12:45 PM | 5,784 sf | 6.64% | 0 sf | 0.00% |  |
| 1:00 PM | 6,066 sf | 6.96% | 0 sf | 0.00% |  |
| 1:15 PM | 6,401 sf | 7.35% | 0 sf | 0.00% |  |
| 1:30 PM | 6,760 sf | 7.76% | 0 sf | 0.00% |  |
| 1:45 PM | 7,173 sf | 8.23% | 0 sf | 0.00% |  |
| 2:00 PM | 7,601 sf | 8.72% | 0 sf | 0.00% |  |
| 2:15 PM | 8,104 sf | 9.30% | 16 sf | 0.02% |  |
| 2:30 PM | 8,672 sf | 9.95% | 83 sf | 0.10% |  |
| 2:45 PM | 9,355 sf | 10.74% | 377 sf | 0.43% |  |
| 3:00 PM | 10,167 sf | 11.67% | 1,621 sf | 1.86% |  |
| 3:15 PM | 11,341 sf | 13.02% | 4,143 sf | 4.76% |  |
| 3:30 PM | 13,065 sf | 15.00% | 8,806 sf | 10.11% |  |
| 3:45 PM | 16,324 sf | 18.74% | 14,673 sf | 16.84% |  |
| 4:00 PM | 24,209 sf | 27.79% | 17,105 sf | 19.63% |  |
| 4:03 PM | 27,281 sf | 31.31% | 16,856 sf | 19.35% |  |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# NOVEMBER 15

Mirror date: January 25
Analysis hours: 7:51 AM-3:57 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

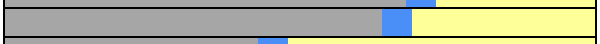
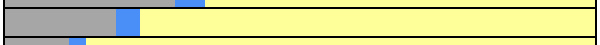
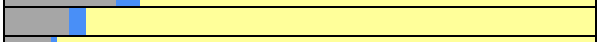
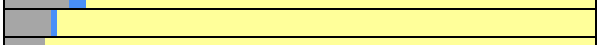
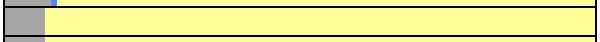
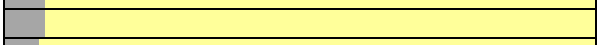
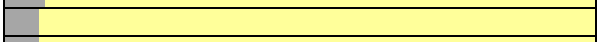
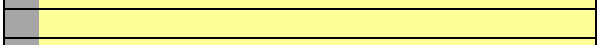
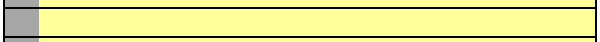
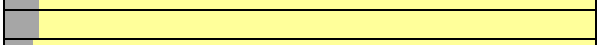
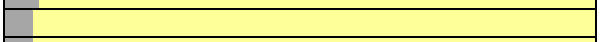
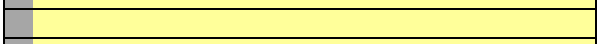
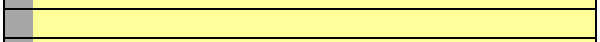
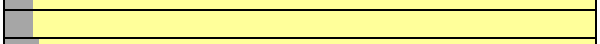
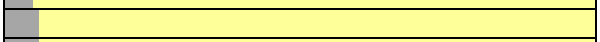
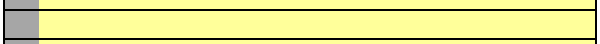
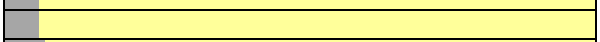
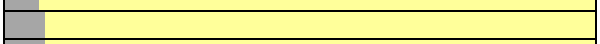
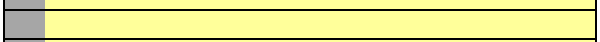
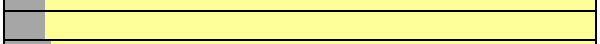
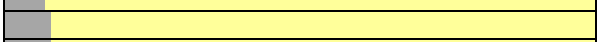
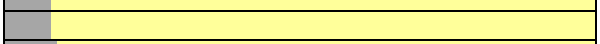
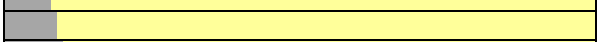
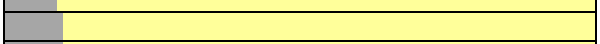
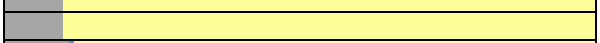
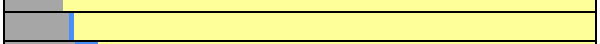
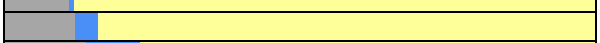
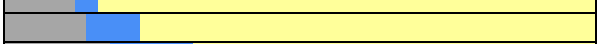
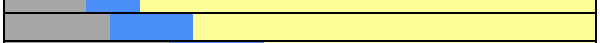
| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:51 AM | 57,456 sf | 65.95% | 4,431 sf | 5.09% | |
| 8:00 AM | 44,494 sf | 51.07% | 5,133 sf | 5.89% | |
| 8:15 AM | 29,993 sf | 34.43% | 4,572 sf | 5.25% | |
| 8:30 AM | 19,421 sf | 22.29% | 3,823 sf | 4.39% | |
| 8:45 AM | 12,326 sf | 14.15% | 3,104 sf | 3.56% | |
| 9:00 AM | 7,383 sf | 8.47% | 2,508 sf | 2.88% | |
| 9:15 AM | 6,271 sf | 7.20% | 368 sf | 0.42% | |
| 9:30 AM | 5,967 sf | 6.85% | 0 sf | 0.00% | |
| 9:45 AM | 5,723 sf | 6.57% | 0 sf | 0.00% | |
| 10:00 AM | 5,494 sf | 6.31% | 0 sf | 0.00% | |
| 10:15 AM | 5,282 sf | 6.06% | 0 sf | 0.00% | |
| 10:30 AM | 5,082 sf | 5.83% | 0 sf | 0.00% | |
| 10:45 AM | 4,904 sf | 5.63% | 0 sf | 0.00% | |
| 11:00 AM | 4,764 sf | 5.47% | 0 sf | 0.00% | |
| 11:15 AM | 4,619 sf | 5.30% | 0 sf | 0.00% | |
| 11:30 AM | 4,538 sf | 5.21% | 0 sf | 0.00% | |
| 11:45 AM | 4,772 sf | 5.48% | 0 sf | 0.00% | |
| 12:00 PM | 5,029 sf | 5.77% | 0 sf | 0.00% | |
| 12:15 PM | 5,292 sf | 6.07% | 0 sf | 0.00% | |
| 12:30 PM | 5,552 sf | 6.37% | 0 sf | 0.00% | |
| 12:45 PM | 5,835 sf | 6.70% | 0 sf | 0.00% | |
| 1:00 PM | 6,127 sf | 7.03% | 0 sf | 0.00% | |
| 1:15 PM | 6,471 sf | 7.43% | 0 sf | 0.00% | |
| 1:30 PM | 6,838 sf | 7.85% | 0 sf | 0.00% | |
| 1:45 PM | 7,253 sf | 8.33% | 0 sf | 0.00% | |
| 2:00 PM | 7,709 sf | 8.85% | 0 sf | 0.00% | |
| 2:15 PM | 8,235 sf | 9.45% | 4 sf | 0.00% | |
| 2:30 PM | 8,834 sf | 10.14% | 54 sf | 0.06% | |
| 2:45 PM | 9,552 sf | 10.96% | 602 sf | 0.69% | |
| 3:00 PM | 10,422 sf | 11.96% | 2,338 sf | 2.68% | |
| 3:15 PM | 11,766 sf | 13.51% | 5,933 sf | 6.81% | |
| 3:30 PM | 13,946 sf | 16.01% | 11,220 sf | 12.88% | |
| 3:45 PM | 19,955 sf | 22.91% | 14,991 sf | 17.21% | |
| 3:57 PM | 31,138 sf | 35.74% | 14,108 sf | 16.19% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# NOVEMBER 22

Mirror date: January 18
Analysis hours: 7:57 AM-3:54 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 7:57 AM | 59,462 sf | 68.25% | 4,024 sf | 4.62% |  |
| 8:00 AM | 56,106 sf | 64.40% | 4,258 sf | 4.89% |  |
| 8:15 AM | 37,839 sf | 43.43% | 4,598 sf | 5.28% |  |
| 8:30 AM | 25,145 sf | 28.86% | 4,022 sf | 4.62% |  |
| 8:45 AM | 16,356 sf | 18.77% | 3,360 sf | 3.86% |  |
| 9:00 AM | 9,898 sf | 11.36% | 2,721 sf | 3.12% |  |
| 9:15 AM | 7,077 sf | 8.12% | 1,031 sf | 1.18% |  |
| 9:30 AM | 6,019 sf | 6.91% | 0 sf | 0.00% |  |
| 9:45 AM | 5,735 sf | 6.58% | 0 sf | 0.00% |  |
| 10:00 AM | 5,508 sf | 6.32% | 0 sf | 0.00% |  |
| 10:15 AM | 5,293 sf | 6.08% | 0 sf | 0.00% |  |
| 10:30 AM | 5,094 sf | 5.85% | 0 sf | 0.00% |  |
| 10:45 AM | 4,921 sf | 5.65% | 0 sf | 0.00% |  |
| 11:00 AM | 4,782 sf | 5.49% | 0 sf | 0.00% |  |
| 11:15 AM | 4,642 sf | 5.33% | 0 sf | 0.00% |  |
| 11:30 AM | 4,551 sf | 5.22% | 0 sf | 0.00% |  |
| 11:45 AM | 4,786 sf | 5.49% | 0 sf | 0.00% |  |
| 12:00 PM | 5,042 sf | 5.79% | 0 sf | 0.00% |  |
| 12:15 PM | 5,311 sf | 6.10% | 0 sf | 0.00% |  |
| 12:30 PM | 5,580 sf | 6.40% | 0 sf | 0.00% |  |
| 12:45 PM | 5,869 sf | 6.74% | 0 sf | 0.00% |  |
| 1:00 PM | 6,165 sf | 7.08% | 0 sf | 0.00% |  |
| 1:15 PM | 6,509 sf | 7.47% | 0 sf | 0.00% |  |
| 1:30 PM | 6,887 sf | 7.90% | 0 sf | 0.00% |  |
| 1:45 PM | 7,318 sf | 8.40% | 0 sf | 0.00% |  |
| 2:00 PM | 7,785 sf | 8.94% | 0 sf | 0.00% |  |
| 2:15 PM | 8,321 sf | 9.55% | 0 sf | 0.00% |  |
| 2:30 PM | 8,937 sf | 10.26% | 31 sf | 0.04% |  |
| 2:45 PM | 9,680 sf | 11.11% | 824 sf | 0.95% |  |
| 3:00 PM | 10,624 sf | 12.20% | 3,146 sf | 3.61% |  |
| 3:15 PM | 12,246 sf | 14.06% | 7,550 sf | 8.67% |  |
| 3:30 PM | 15,814 sf | 18.15% | 12,449 sf | 14.29% |  |
| 3:45 PM | 24,777 sf | 28.44% | 13,761 sf | 15.80% |  |
| 3:54 PM | 34,860 sf | 40.01% | 11,627 sf | 13.35% |  |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# NOVEMBER 29

Mirror date: January 11
Analysis hours: 8:04 AM-3:51 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 8:04 AM | 60,975 sf | 69.99% | 3,790 sf | 4.35% | |
| 8:15 AM | 46,327 sf | 53.18% | 4,521 sf | 5.19% | |
| 8:30 AM | 31,415 sf | 36.06% | 4,084 sf | 4.69% | |
| 8:45 AM | 20,984 sf | 24.09% | 3,555 sf | 4.08% | |
| 9:00 AM | 13,129 sf | 15.07% | 2,935 sf | 3.37% | |
| 9:15 AM | 8,485 sf | 9.74% | 1,824 sf | 2.09% | |
| 9:30 AM | 6,811 sf | 7.82% | 0 sf | 0.00% | |
| 9:45 AM | 5,872 sf | 6.74% | 0 sf | 0.00% | |
| 10:00 AM | 5,532 sf | 6.35% | 0 sf | 0.00% | |
| 10:15 AM | 5,316 sf | 6.10% | 0 sf | 0.00% | |
| 10:30 AM | 5,117 sf | 5.87% | 0 sf | 0.00% | |
| 10:45 AM | 4,940 sf | 5.67% | 0 sf | 0.00% | |
| 11:00 AM | 4,804 sf | 5.51% | 0 sf | 0.00% | |
| 11:15 AM | 4,670 sf | 5.36% | 0 sf | 0.00% | |
| 11:30 AM | 4,546 sf | 5.22% | 0 sf | 0.00% | |
| 11:45 AM | 4,759 sf | 5.46% | 0 sf | 0.00% | |
| 12:00 PM | 5,000 sf | 5.74% | 0 sf | 0.00% | |
| 12:15 PM | 5,294 sf | 6.08% | 0 sf | 0.00% | |
| 12:30 PM | 5,585 sf | 6.41% | 0 sf | 0.00% | |
| 12:45 PM | 5,879 sf | 6.75% | 0 sf | 0.00% | |
| 1:00 PM | 6,178 sf | 7.09% | 0 sf | 0.00% | |
| 1:15 PM | 6,517 sf | 7.48% | 0 sf | 0.00% | |
| 1:30 PM | 6,904 sf | 7.92% | 0 sf | 0.00% | |
| 1:45 PM | 7,335 sf | 8.42% | 0 sf | 0.00% | |
| 2:00 PM | 7,810 sf | 8.96% | 0 sf | 0.00% | |
| 2:15 PM | 8,358 sf | 9.59% | 0 sf | 0.00% | |
| 2:30 PM | 8,980 sf | 10.31% | 24 sf | 0.03% | |
| 2:45 PM | 9,745 sf | 11.19% | 1,069 sf | 1.23% | |
| 3:00 PM | 10,930 sf | 12.55% | 3,847 sf | 4.42% | |
| 3:15 PM | 13,003 sf | 14.93% | 8,515 sf | 9.77% | |
| 3:30 PM | 17,870 sf | 20.51% | 12,500 sf | 14.35% | |
| 3:45 PM | 29,585 sf | 33.96% | 12,017 sf | 13.79% | |
| 3:51 PM | 38,226 sf | 43.88% | 9,782 sf | 11.23% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# DECEMBER 6

Mirror date: January 4
Analysis hours: 8:10 AM-3:51 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 8:10 AM | 62,077 sf | 71.25% | 3,623 sf | 4.16% | |
| 8:15 AM | 55,171 sf | 63.33% | 3,964 sf | 4.55% | |
| 8:30 AM | 37,834 sf | 43.43% | 4,133 sf | 4.74% | |
| 8:45 AM | 25,717 sf | 29.52% | 3,623 sf | 4.16% | |
| 9:00 AM | 16,650 sf | 19.11% | 3,157 sf | 3.62% | |
| 9:15 AM | 10,386 sf | 11.92% | 2,530 sf | 2.90% | |
| 9:30 AM | 7,843 sf | 9.00% | 260 sf | 0.30% | |
| 9:45 AM | 6,564 sf | 7.53% | 0 sf | 0.00% | |
| 10:00 AM | 5,653 sf | 6.49% | 0 sf | 0.00% | |
| 10:15 AM | 5,348 sf | 6.14% | 0 sf | 0.00% | |
| 10:30 AM | 5,150 sf | 5.91% | 0 sf | 0.00% | |
| 10:45 AM | 4,967 sf | 5.70% | 0 sf | 0.00% | |
| 11:00 AM | 4,834 sf | 5.55% | 0 sf | 0.00% | |
| 11:15 AM | 4,701 sf | 5.40% | 0 sf | 0.00% | |
| 11:30 AM | 4,542 sf | 5.21% | 0 sf | 0.00% | |
| 11:45 AM | 4,757 sf | 5.46% | 0 sf | 0.00% | |
| 12:00 PM | 5,024 sf | 5.77% | 0 sf | 0.00% | |
| 12:15 PM | 5,298 sf | 6.08% | 0 sf | 0.00% | |
| 12:30 PM | 5,573 sf | 6.40% | 0 sf | 0.00% | |
| 12:45 PM | 5,859 sf | 6.72% | 0 sf | 0.00% | |
| 1:00 PM | 6,163 sf | 7.07% | 0 sf | 0.00% | |
| 1:15 PM | 6,497 sf | 7.46% | 0 sf | 0.00% | |
| 1:30 PM | 6,881 sf | 7.90% | 0 sf | 0.00% | |
| 1:45 PM | 7,318 sf | 8.40% | 0 sf | 0.00% | |
| 2:00 PM | 7,793 sf | 8.95% | 0 sf | 0.00% | |
| 2:15 PM | 8,341 sf | 9.57% | 0 sf | 0.00% | |
| 2:30 PM | 8,961 sf | 10.29% | 23 sf | 0.03% | |
| 2:45 PM | 9,870 sf | 11.33% | 1,182 sf | 1.36% | |
| 3:00 PM | 11,182 sf | 12.83% | 4,220 sf | 4.84% | |
| 3:15 PM | 13,645 sf | 15.66% | 8,831 sf | 10.14% | |
| 3:30 PM | 19,347 sf | 22.21% | 12,156 sf | 13.95% | |
| 3:45 PM | 32,446 sf | 37.24% | 10,874 sf | 12.48% | |
| 3:51 PM | 41,983 sf | 48.19% | 7,815 sf | 8.97% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# DECEMBER 13

Mirror date: December 28
Analysis hours: 8:15 AM-3:52 PM (PST)

Shadow / Sunlight Balance Key
Existing Shadow | Project Shadow | Sunlight Remaining

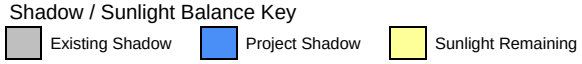
| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 8:15 AM | 62,797 sf | 72.08% | 3,498 sf | 4.02% | |
| 8:30 AM | 44,071 sf | 50.59% | 4,120 sf | 4.73% | |
| 8:45 AM | 30,241 sf | 34.71% | 3,724 sf | 4.27% | |
| 9:00 AM | 19,954 sf | 22.90% | 3,236 sf | 3.71% | |
| 9:15 AM | 12,851 sf | 14.75% | 2,723 sf | 3.13% | |
| 9:30 AM | 8,805 sf | 10.11% | 869 sf | 1.00% | |
| 9:45 AM | 7,255 sf | 8.33% | 0 sf | 0.00% | |
| 10:00 AM | 6,109 sf | 7.01% | 0 sf | 0.00% | |
| 10:15 AM | 5,439 sf | 6.24% | 0 sf | 0.00% | |
| 10:30 AM | 5,186 sf | 5.95% | 0 sf | 0.00% | |
| 10:45 AM | 4,998 sf | 5.74% | 0 sf | 0.00% | |
| 11:00 AM | 4,857 sf | 5.58% | 0 sf | 0.00% | |
| 11:15 AM | 4,731 sf | 5.43% | 0 sf | 0.00% | |
| 11:30 AM | 4,548 sf | 5.22% | 0 sf | 0.00% | |
| 11:45 AM | 4,709 sf | 5.40% | 0 sf | 0.00% | |
| 12:00 PM | 4,976 sf | 5.71% | 0 sf | 0.00% | |
| 12:15 PM | 5,253 sf | 6.03% | 0 sf | 0.00% | |
| 12:30 PM | 5,528 sf | 6.35% | 0 sf | 0.00% | |
| 12:45 PM | 5,821 sf | 6.68% | 0 sf | 0.00% | |
| 1:00 PM | 6,123 sf | 7.03% | 0 sf | 0.00% | |
| 1:15 PM | 6,454 sf | 7.41% | 0 sf | 0.00% | |
| 1:30 PM | 6,831 sf | 7.84% | 0 sf | 0.00% | |
| 1:45 PM | 7,258 sf | 8.33% | 0 sf | 0.00% | |
| 2:00 PM | 7,731 sf | 8.87% | 0 sf | 0.00% | |
| 2:15 PM | 8,270 sf | 9.49% | 0 sf | 0.00% | |
| 2:30 PM | 8,933 sf | 10.25% | 0 sf | 0.00% | |
| 2:45 PM | 9,859 sf | 11.32% | 1,062 sf | 1.22% | |
| 3:00 PM | 11,281 sf | 12.95% | 4,068 sf | 4.67% | |
| 3:15 PM | 13,808 sf | 15.85% | 8,530 sf | 9.79% | |
| 3:30 PM | 19,540 sf | 22.43% | 11,753 sf | 13.49% | |
| 3:45 PM | 32,452 sf | 37.25% | 10,549 sf | 12.11% | |
| 3:52 PM | 44,996 sf | 51.65% | 6,232 sf | 7.15% | |

PROJECT: Family Zoning Plan
OPEN SPACE: Joe DiMaggio (87,120 sf)

# DECEMBER 20

Winter solstice (December 21 similar)
Analysis hours: 8:19 AM-3:54 PM (PST)

Shadow / Sunlight Balance Key




| Analysis Time | EXISTING SHADOW | | PROJECT NET NEW SHADOW | | SHADOW/SUNLIGHT BALANCE |
|---|---|---|---|---|---|
| | Shadow Area | Coverage | Shadow Area | Coverage | Relative levels of Shadow vs. Sun |
| 8:19 AM | 63,052 sf | 72.37% | 3,457 sf | 3.97% | |
| 8:30 AM | 49,142 sf | 56.41% | 4,080 sf | 4.68% | |
| 8:45 AM | 34,003 sf | 39.03% | 3,810 sf | 4.37% | |
| 9:00 AM | 22,611 sf | 25.95% | 3,341 sf | 3.83% | |
| 9:15 AM | 14,836 sf | 17.03% | 2,875 sf | 3.30% | |
| 9:30 AM | 9,679 sf | 11.11% | 1,488 sf | 1.71% | |
| 9:45 AM | 7,787 sf | 8.94% | 0 sf | 0.00% | |
| 10:00 AM | 6,454 sf | 7.41% | 0 sf | 0.00% | |
| 10:15 AM | 5,621 sf | 6.45% | 0 sf | 0.00% | |
| 10:30 AM | 5,229 sf | 6.00% | 0 sf | 0.00% | |
| 10:45 AM | 5,039 sf | 5.78% | 0 sf | 0.00% | |
| 11:00 AM | 4,883 sf | 5.61% | 0 sf | 0.00% | |
| 11:15 AM | 4,765 sf | 5.47% | 0 sf | 0.00% | |
| 11:30 AM | 4,623 sf | 5.31% | 0 sf | 0.00% | |
| 11:45 AM | 4,656 sf | 5.34% | 0 sf | 0.00% | |
| 12:00 PM | 4,923 sf | 5.65% | 0 sf | 0.00% | |
| 12:15 PM | 5,200 sf | 5.97% | 0 sf | 0.00% | |
| 12:30 PM | 5,472 sf | 6.28% | 0 sf | 0.00% | |
| 12:45 PM | 5,762 sf | 6.61% | 0 sf | 0.00% | |
| 1:00 PM | 6,064 sf | 6.96% | 0 sf | 0.00% | |
| 1:15 PM | 6,389 sf | 7.33% | 0 sf | 0.00% | |
| 1:30 PM | 6,753 sf | 7.75% | 0 sf | 0.00% | |
| 1:45 PM | 7,175 sf | 8.24% | 0 sf | 0.00% | |
| 2:00 PM | 7,635 sf | 8.76% | 0 sf | 0.00% | |
| 2:15 PM | 8,165 sf | 9.37% | 0 sf | 0.00% | |
| 2:30 PM | 8,816 sf | 10.12% | 0 sf | 0.00% | |
| 2:45 PM | 9,715 sf | 11.15% | 772 sf | 0.89% | |
| 3:00 PM | 11,060 sf | 12.70% | 3,478 sf | 3.99% | |
| 3:15 PM | 13,417 sf | 15.40% | 7,731 sf | 8.87% | |
| 3:30 PM | 18,450 sf | 21.18% | 11,434 sf | 13.12% | |
| 3:45 PM | 30,188 sf | 34.65% | 10,821 sf | 12.42% | |
| 3:54 PM | 46,296 sf | 53.14% | 5,558 sf | 6.38% | |

# EXHIBIT E

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

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November 14, 2025

Richard Drury
Lozeau | Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

**Subject:** **Comments on the Family Zoning Plan – Housing Element Rezoning Program (SCH No. 2021060358)**

Dear Mr. Drury,

We have reviewed the September 2025 Addendum No. 1 to Environmental Impact Report ("Addendum") and the November 2022 Final Environmental Impact Report ("FEIR") for the Family Zoning Plan – Housing Element Rezoning Program ("Project") located in the City of San Francisco ("City"). The Addendum proposes to develop an additional 4,000 housing units to bring the total units under the Family Zoning Plan to 54,000 housing units.

Our review concludes that the Addendum fails to adequately evaluate the Project's hazards, hazardous materials, and air quality impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A subsequent Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential hazards, hazardous materials, and air quality impacts that the project may have on the environment.

# Hazards and Hazardous Materials

## Inadequate Disclosure and Analysis of Impacts

The Addendum and FEIR do not mention the newly passed AB 130 which mandates that hazardous waste sites be addressed through the completion of a Phase I Environmental Site Assessments ("ESAs"). AB 130 states: [1]

> "The development can proceed as a "use by right" if, [among other provisions],

[1] "Assembly Bill No. 130." California State Legislature, 2025, *available at:* https://legiscan.com/CA/text/AB130/id/3258333

(13) (A) The development proponent completes a Phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code, and a Phase II environmental assessment, as defined in subdivision (o) of Section 25403 of the Health and Safety Code, if warranted.

(B) If a recognized environmental condition is found, the development proponent shall undertake a preliminary endangerment assessment, as defined in Section 78095 of the Health and Safety Code, prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity.

(i) If a release of hazardous substance is found to exist on the site, the release shall be removed, or any significant effect of the release shall be mitigated to a level of insignificance in compliance with state and federal requirements.

(ii) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with current state and federal requirements."

These requirements are not mentioned in the Addendum or FEIR. There are thousands of hazardous waste sites in San Francisco. According to the FEIR, there are 2,000 Maher sites and 2,300 Cortese List sites within San Francisco (p. 4.1-219) [2]. All Maher- and Cortese-listed sites that will be subject to development under this Project will need to undergo a Phase I ESA according to the AB 130 text cited above.

Phase I ESAs are conducted to identify if any recognized environmental conditions are found that would potentially pose a health risk to construction workers or for future residents. If a recognized environmental condition is found, a more detailed preliminary endangerment assessment is required to identify any hazardous substance release.

A subsequent EIR should be prepared to include specific mitigation measures for dealing with Maher- and Cortese-listed sites in a manner consistent with AB 130. These mitigation measures must include provisions for conducting Phase I ESAs and, if recognized conditions are found, Phase II ESAs so that the health of construction workers, future occupants and workers is protected.

[2] The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with the California Environmental Quality Act requirements in providing information about the location of hazardous materials release sites. Government Code section 65962.5 requires the California Environmental Protection Agencyopens in a new window to develop at least annually an updated Cortese List. DTSC is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List. https://dtsc.ca.gov/dtscs-cortese-list/

# Air Quality

## Failure to Quantify and Adequately Evaluate Criteria Air Pollutant Emissions

The Addendum fails to quantify the criteria air pollutant emissions associated with Project construction and operation. Rather, in regard to the proposed Project's construction-related air quality impacts, the Addendum states:

> "The proposed rezoning program and subsequent development is expected to result in the same significant criteria air pollutant impacts from construction but not substantially more severe impacts than those disclosed in the EIR" (p. 93).

Similarly, in regard to the Project's operational air quality impacts, the Addendum states:

> "The conclusion in the FEIR is that total operational emissions for future development would be below the air district's thresholds of significance for all pollutants. That conclusion also applies to the proposed rezoning program. Operational emissions would not exceed any thresholds for any representative building type that would be constructed under the proposed rezoning program, and the impact would be less than significant" (p. 95).

However, relevant Bay Area Air Quality Management District ("BAAQMD") guidance supports the calculation of the Project's air pollutant emissions. The Addendum proposes to construct an additional 4,000 residential units. According to BAAQMD's screening criteria, apartments and condo-townhouse land uses must undergo further environmental review if they exceed 416 units for construction or 637/638 units for operational emissions (see table below).[3]

[3] "Screening For Criteria Air Pollutants and Precursors." BAAQMD, 2022, *available at*: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?la=en, p. 4.

| Land Use Category | Land Use Subcategory | Land Use Unit | Screening Level | |
|---|---|---|---|---|
| | | | Construction | Operation |
| Education | Worship Place | KSF | 452 | 642 |
| Industrial | General Heavy Industry | KSF | 452 | 1,009 |
| Industrial | General Light Industry | KSF | 452 | 998 |
| Industrial | Industrial Park | KSF | 452 | 1,247 |
| Industrial | Manufacturing | KSF | 452 | 1,009 |
| Industrial | Warehouse[1] | KSF | 452 | 1,423 |
| Recreational | Arena | KSF | 732 | 600 |
| Recreational | City Park | Acres | 10 | 175 |
| Recreational | Fast Food Restaurant | KSF | 452 | 21 |
| Recreational | Health Club | KSF | 452 | 261 |
| Recreational | Hotel | Rooms | 312 | 633 |
| Recreational | Motel | Rooms | 230 | 767 |
| Recreational | Movie Theater | KSF | 458 | 80 |
| Recreational | Restaurant – High Turnover (Sit-Down) | KSF | 452 | 75 |
| Recreational | Restaurant – Quality (Fine Dining) | KSF | 452 | 105 |
| Recreational | Racquet Club | KSF | 452 | 457 |
| Recreational | Recreational Swimming Pool | KSF | 452 | 376 |
| Residential | Apartments | DU | 416 | 638 |
| Residential | Condo-Townhouse | DU | 416 | 637 |
| Residential | Mobile Home Park | DU | 377 | 721 |
| Residential | Congregate Care/Retirement Community | DU | 416 | 1,008 |
| Residential | Single Family Housing | DU | 254 | 421 |
| Retail | Auto Care Center | KSF | 452 | 356 |
| Retail | Convenience Market | KSF | 452 | 11 |
| Retail | Discount Store | KSF | 452 | 150 |
| Retail | Home Improvement Superstore/Hardware-Paint Store | KSF | 452 | 221 |
| Retail | Regional Shopping Center | KSF | 452 | 221 |
| Retail | Strip Mall | KSF | 452 | 204 |
| Retail | Supermarket | KSF | 452 | 72 |

Notes: DU = dwelling unit; KSF = thousand square feet.

Furthermore, the BAAQMD indicates that if a Project includes any of the listed screening criteria, "then the lead agency would need to perform a detailed assessment of the project's criteria air pollutant and precursor emissions."[4] Thus, pursuant to relevant BAAQMD guidance, a quantitative air quality analysis should be prepared in a subsequent EIR.

Without making an effort to estimate the Project's potential construction-related and operational criteria air pollutant emissions, the Addendum lacks evidence to support the conclusion that the Project's emissions would not exceed the applicable BAAQMD significance thresholds. Until further analysis is provided, we cannot verify the Project would not result in new, significant air quality impacts already addressed in the FEIR. The Project should not be approved until a subsequent EIR is prepared to adequately assess and mitigate the potential air quality impacts that Project construction and operation may have on the surrounding environment.

## SWAPE's Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to estimate construction-related and operational emissions that may result from development of the additional 4,000 housing units under the Addendum, we prepared a preliminary CalEEMod model. Our analysis provides a generalized evaluation of a range of potential residential building types. Specifically, we modeled accounting for 2,000 "Apartments Mid Rise" and 2,000

[4] "Screening For Criteria Air Pollutants and Precursors." BAAQMD, 2022, *available at*: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?la=en, p. 4.

"Condo/Townhouse High Rise" land use subtypes. Because Project-specific details such as construction schedule, equipment types, and operating parameters are not known at this time, all other values were left as default.

Our analysis estimates that the Project's construction and operational related reactive organic gases/volatile organic compounds ("ROG/VOC") emissions exceed the BAAQMD daily threshold of 54 pounds per day ("lbs/day") (see table below).

| SWAPE Criteria Air Pollutant Emissions Estimates | | |
|---|---|---|
| | **Construction ROG/VOC** (lbs/day) | **Operational ROG/VOC** (lbs/day) |
| SWAPE | 148 | 145 |
| **BAAQMD Threshold** | **54** | **54** |
| *Exceeds?* | ***Yes*** | ***Yes*** |

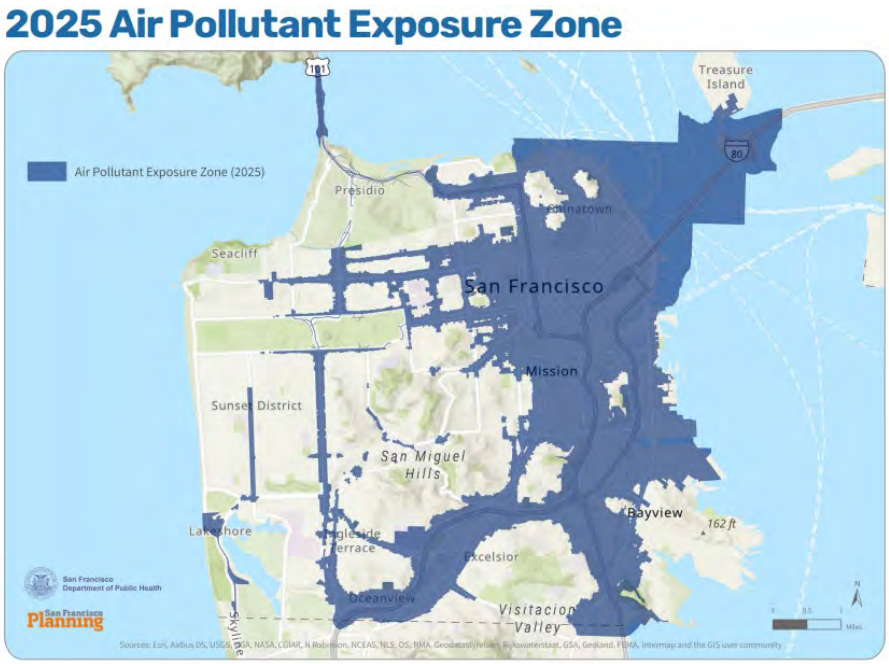
According to our analysis, the construction and operational related ROG/VOC emissions are estimated to be approximately 148 and 145 lbs/day, respectively, exceeding the BAAQMD daily threshold. This finding indicates a potentially significant air quality impact that the Addendum did not identify or address. In our opinion, a subsequent EIR should be conducted to provide a more substantial calculation of the Project's emissions and a more detailed evaluation of the Project's potential air quality impacts.

## Failure to Adequately Account for Air Pollution Exposure Zones

The Addendum proposes development in the Downtown, Marina, Mission, Northeast, and Western Addition planning districts, which have areas within the City's air pollutant exposure zones ("APEZ"). The Addendum states that "the proposed rezoning program may result in a small proportion of additional rezoned parcels being in the APEZ, which could increase the number of people exposed to the generally high pollutant concentrations in the APEZ" (p. 97).

In 2025, the City identified new APEZ areas, defined as locations "where particulate matter ($PM_{2.5}$) is greater than or equal to 9 µg/$m^3$ or where the risk of cancer from air pollutants is greater than or equal to 100 in a million," and are displayed in the APEZ map presented below:[5]

[5] "2025 Air Pollutant Exposure Zone." San Francisco Department of Public Health, February 2025, available at: https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=216571d03e991ee3e00bc434a2415eb36eabc17a8f25a39dc8105f404b976d2f&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0.




According to the City:

> "Since 2008, San Francisco Health Code article 38 requires new residential construction projects in the APEZ to install enhanced ventilation in buildings to protect residents from the health effects of poor air quality. In addition, through the environmental review process, many construction projects in the APEZ are required to use the cleanest available construction equipment to reduce air quality impacts."[6][7]

As demonstrated above, residential projects are recommended to install enhanced ventilation in buildings. The Addendum and FEIR have failed to do so. Additionally, the Addendum concludes that the $PM_{2.5}$ and cancer risk impacts associated with the Project would be significant-and-unavoidable with mitigation, stating:

> "The maximum increases in $PM_{2.5}$ concentrations and cancer risks would not be meaningfully different than those found in the FEIR analysis, and the results would most likely still be above the air district's thresholds and thus significant and unavoidable with mitigation" (p. 97).

While we agree that the Project would result in significant air quality impacts, the Addendum's assertion that this impact is significant-and-unavoidable is unsupported. The Project proposed by the Addendum would allow further residential development within newly designated APEZ areas, which are already characterized by elevated $PM_{2.5}$ levels and an increased cancer risk. By facilitating new housing in these

[6] "Air Quality Review." San Francisco Planning, 2025, *available at:* https://sfplanning.org/air-quality#permit-anchor-3.
[7] "ARTICLE 38: Enhanced Ventilation for Urban Infill." City and County of San Francisco, December 2008, *available at: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_health/0-0-0-6054*.

areas without committing to additional mitigation, the Addendum could expose future residents to potentially significant health impacts. According to CEQA Guidelines §15096(g)(2):

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."[8]

As such, the Addendum is required under CEQA to implement all feasible mitigation to reduce impacts to a less-than-significant level. To reduce the Project's air quality impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions." The Project should not be approved until a subsequent EIR is prepared, incorporating all feasible mitigation to reduce emissions to the maximum extent possible.

# Mitigation

## Feasible Mitigation Measures Available to Reduce Emissions

The Addendum is required under CEQA to implement all feasible mitigation to reduce the Project's potential impacts. As demonstrated above, the Project would result in potentially significant air quality impacts that should be mitigated further.

To reduce the VOC emissions associated with Project construction and operation, we recommend the Addendum consider incorporating the following mitigation measures:[9]

- Use super-compliant VOC-content architectural coatings (0 grams per liter to less than 10 grams per liter VOC) during Project construction application of paints and other architectural coatings.
- If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, or they do not reduce emissions to below thresholds, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September.

While the Project is not located in Los Angeles County, the above mitigation measures would decrease emissions regardless. Further mitigation used by other land use development projects to address VOC emissions include:[10]

[8] "Cal. Code Regs. tit. 14 § 15096." California Legislature, available at: https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-7-eir-process/section-15096-process-for-a-responsible-agency.

[9] "Mitigation Monitoring and Reporting Program." Los Angeles County Housing Element Update Program EIR. August 2021, *available at*: https://planning.lacounty.gov/wp-content/uploads/2023/07/Housing_final-peir-mitigation-monitoring.pdf.

[10] "Banning Commerce Center Project." Kimley-Horn and Associates, Inc., June 2024, *available at*: https://ceqanet.opr.ca.gov/2022090102/2; Draft Environmental Impact Report, p. 1-7.

- Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain
- Use compliant low-VOC cleaning solvents to clean paint application equipment.
- Keep all paint- and solvent-laden rags in sealed containers to prevent VOC emissions.
- Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable.
- Use high-pressure/low-volume paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.
- Manual application using a paintbrush, hand-roller, trowel, spatula, dauber, rag, or sponge, to achieve a 100 percent application efficiency.

In order to reduce the $PM_{2.5}$ and cancer risk emissions associated with the Project and recommend the Addendum consider incorporating several mitigation measures as listed below. Incorporating these measures would also reduce cumulative exposure for future residential developments proposed within APEZ zones, where pollutant concentrations are already elevated. The Southern California Association of Governments' Certified Final Program Environmental Impact Report for Connect SoCal 2024 recommends the following Project-level air quality mitigation measures: [11]

- Installing high-efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.
- Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.
- Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
- Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
- Set criteria for assessing progress in installing and replacing the enhanced filtration units,
- Develop a process for evaluating the effectiveness of the enhanced filtration units.
- Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.

[11] "Certified Final Program Environmental Impact Report for Connect SoCal 2024." SCAG, May 2020, *available at:* https://scag.ca.gov/program-environmental-impact-report-0.

- Establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
- Obtain CARB Portable Equipment Registration with the state or a local district permit for portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles. Arrange appropriate consultations with CARB or the local air district to determine registration and permitting requirements prior to equipment operation at the site.
- Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, parks and public spaces, minimize pedestrian barriers.
- Create urban non-motorized zones.
- Provide bike parking in non-residential and multi-unit residential projects
- Require residential area parking permit.
- Provide ride-sharing programs:
    - Designate a certain percentage of parking spacing for ride sharing vehicles,
    - Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles,
    - Providing a web site or messaging board for coordinating rides, and
    - Permanent transportation management association membership and finding requirement.

Provided above are several mitigation measures that would reduce Project-related VOC and $PM_{2.5}$/cancer risk emissions. These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduces emissions released during Project construction and operation.

A subsequent EIR should be prepared that includes all feasible mitigation measures, as well as an updated air quality analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The subsequent EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible.

## Disclaimer

SWAPE has received limited documentation regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was

reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

Attachment A: CalEEMod Output Files
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Attachment A

# San Francisco Housing Element Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

| Data Field | Value |
|---|---|
| Project Name | San Francisco Housing Element |
| Construction Start Date | 1/1/2026 |
| Operational Year | 2050 |
| Lead Agency | — |
| Land Use Scale | Plan/community |
| Analysis Level for Defaults | County |
| Windspeed (m/s) | 3.9 |
| Precipitation (days) | 42 |
| Location | San Francisco, CA, USA |
| County | San Francisco |
| City | San Francisco |
| Air District | Bay Area AQMD |
| Air Basin | San Francisco Bay Area |
| TAZ | 1047 |
| EDFZ | 1 |
| Electric Utility | Pacific Gas & Electric Company |
| Gas Utility | Pacific Gas & Electric |
| App Version | 2022.1.1.32 |

## 1.2. Land Use Types

| Land Use Subtype | Size | Unit | Lot Acreage | Building Area (sq ft) | Landscape Area (sq ft) | Special Landscape Area (sq ft) | Population | Description |
|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 2,000 | Dwelling Unit | 53 | 1,920,000 | — | — | 4,660 | — |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Condo/Townhouse High Rise | 2,000 | Dwelling Unit | 31 | 1,920,000 | — | — | 4,660 | — |

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

# 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Un/Mit. | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 493 | 493 | 33 | 121 | 0.10 | 1.2 | 27 | 27 | 1.1 | 10 | 11 | — | 39,740 | 39,740 | 2.1 | 2.0 | 105 | 40,504 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 493 | 493 | 35 | 113 | 0.10 | 1.1 | 27 | 27 | 1.0 | 6.5 | 6.9 | — | 38,384 | 38,384 | 2.3 | 2.8 | 2.7 | 39,270 |
| Average Daily (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 148 | 148 | 23 | 76 | 0.07 | 0.74 | 19 | 19 | 0.68 | 4.5 | 4.8 | — | 26,971 | 26,971 | 1.5 | 1.6 | 29 | 27,454 |
| Annual (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 27 | 27 | 4.2 | 14 | 0.01 | 0.14 | 3.4 | 3.5 | 0.12 | 0.83 | 0.87 | — | 4,465 | 4,465 | 0.25 | 0.26 | 4.8 | 4,545 |

### 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Year | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily - Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| 2026 | 3.8 | 3.2 | 29 | 29 | 0.06 | 1.2 | 20 | 21 | 1.1 | 10 | 11 | — | 6,776 | 6,776 | 0.27 | 0.05 | 0.62 | 6,799 |
| 2027 | 11 | 8.6 | 33 | 121 | 0.10 | 0.42 | 27 | 27 | 0.39 | 6.5 | 6.9 | — | 39,740 | 39,740 | 2.1 | 2.0 | 105 | 40,504 |
| 2028 | 11 | 8.4 | 31 | 116 | 0.10 | 0.38 | 27 | 27 | 0.36 | 6.5 | 6.8 | — | 38,945 | 38,945 | 2.1 | 1.9 | 94 | 39,672 |
| 2029 | 11 | 8.1 | 29 | 111 | 0.10 | 0.35 | 27 | 27 | 0.33 | 6.5 | 6.8 | — | 38,138 | 38,138 | 1.9 | 1.9 | 84 | 38,850 |
| 2030 | 9.5 | 7.8 | 28 | 107 | 0.10 | 0.34 | 27 | 27 | 0.32 | 6.5 | 6.8 | — | 37,342 | 37,342 | 1.8 | 1.9 | 74 | 38,018 |
| 2031 | 9.2 | 7.6 | 26 | 104 | 0.10 | 0.32 | 27 | 27 | 0.30 | 6.5 | 6.8 | — | 36,693 | 36,693 | 1.7 | 1.8 | 65 | 37,333 |
| 2032 | 8.9 | 7.4 | 24 | 101 | 0.10 | 0.30 | 27 | 27 | 0.29 | 6.5 | 6.8 | — | 35,954 | 35,954 | 1.6 | 1.8 | 57 | 36,583 |
| 2033 | 493 | 493 | 5.9 | 16 | 0.01 | 0.18 | 4.8 | 4.8 | 0.17 | 1.1 | 1.1 | — | 4,730 | 4,730 | 0.06 | 0.04 | 7.6 | 4,750 |
| Daily - Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| 2026 | 3.7 | 3.1 | 27 | 28 | 0.06 | 1.1 | 9.4 | 10 | 1.0 | 3.7 | 4.7 | — | 6,766 | 6,766 | 0.27 | 0.06 | 0.02 | 6,791 |
| 2027 | 11 | 8.5 | 35 | 113 | 0.10 | 1.0 | 27 | 27 | 0.96 | 6.5 | 6.9 | — | 38,384 | 38,384 | 2.3 | 2.8 | 2.7 | 39,270 |
| 2028 | 11 | 8.2 | 33 | 108 | 0.10 | 0.38 | 27 | 27 | 0.36 | 6.5 | 6.8 | — | 37,614 | 37,614 | 2.1 | 2.7 | 2.4 | 38,471 |
| 2029 | 11 | 7.8 | 31 | 104 | 0.10 | 0.35 | 27 | 27 | 0.33 | 6.5 | 6.8 | — | 36,830 | 36,830 | 2.0 | 2.7 | 2.2 | 37,685 |
| 2030 | 9.5 | 7.7 | 29 | 100 | 0.10 | 0.34 | 27 | 27 | 0.32 | 6.5 | 6.8 | — | 36,055 | 36,055 | 2.0 | 1.9 | 1.9 | 36,663 |
| 2031 | 9.1 | 7.4 | 27 | 97 | 0.10 | 0.32 | 27 | 27 | 0.30 | 6.5 | 6.8 | — | 35,418 | 35,418 | 1.7 | 1.8 | 1.7 | 35,996 |
| 2032 | 8.8 | 7.3 | 26 | 93 | 0.10 | 0.30 | 27 | 27 | 0.29 | 6.5 | 6.8 | — | 34,697 | 34,697 | 1.6 | 1.8 | 1.5 | 35,273 |
| 2033 | 493 | 493 | 25 | 90 | 0.10 | 0.28 | 27 | 27 | 0.27 | 6.5 | 6.8 | — | 34,007 | 34,007 | 1.5 | 1.7 | 1.3 | 34,556 |
| 2034 | 493 | 493 | 1.5 | 14 | < 0.005 | 0.01 | 4.8 | 4.8 | 0.01 | 1.1 | 1.1 | — | 4,430 | 4,430 | 0.07 | 0.04 | 0.17 | 4,443 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| 2026 | 2.4 | 2.0 | 18 | 18 | 0.03 | 0.74 | 5.8 | 6.6 | 0.68 | 2.7 | 3.4 | — | 3,709 | 3,709 | 0.15 | 0.03 | 0.17 | 3,723 |
| 2027 | 6.8 | 5.1 | 23 | 66 | 0.07 | 0.39 | 16 | 17 | 0.37 | 4.1 | 4.5 | — | 22,553 | 22,553 | 1.3 | 1.6 | 25 | 23,076 |
| 2028 | 7.8 | 5.8 | 23 | 76 | 0.07 | 0.27 | 19 | 19 | 0.25 | 4.5 | 4.8 | — | 26,971 | 26,971 | 1.5 | 1.4 | 29 | 27,454 |
| 2029 | 7.5 | 5.6 | 22 | 73 | 0.07 | 0.25 | 19 | 19 | 0.24 | 4.5 | 4.7 | — | 26,337 | 26,337 | 1.4 | 1.4 | 26 | 26,813 |
| 2030 | 6.7 | 5.5 | 20 | 69 | 0.07 | 0.24 | 19 | 19 | 0.23 | 4.5 | 4.7 | — | 25,782 | 25,782 | 1.4 | 1.3 | 23 | 26,237 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 2031 | 6.4 | 5.2 | 19 | 67 | 0.07 | 0.23 | 19 | 19 | 0.22 | 4.5 | 4.7 | — | 25,327 | 25,327 | 1.2 | 1.3 | 20 | 25,759 |
| 2032 | 6.2 | 5.2 | 19 | 65 | 0.07 | 0.22 | 19 | 19 | 0.20 | 4.5 | 4.7 | — | 24,879 | 24,879 | 1.1 | 1.3 | 17 | 25,307 |
| 2033 | 148 | 148 | 5.0 | 17 | 0.02 | 0.09 | 4.4 | 4.5 | 0.08 | 1.0 | 1.1 | — | 5,689 | 5,689 | 0.21 | 0.21 | 3.4 | 5,760 |
| 2034 | 2.9 | 2.9 | 0.01 | 0.08 | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | 0.01 | 0.01 | — | 26 | 26 | < 0.005 | < 0.005 | 0.02 | 26 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| 2026 | 0.43 | 0.37 | 3.3 | 3.3 | 0.01 | 0.14 | 1.1 | 1.2 | 0.12 | 0.49 | 0.61 | — | 614 | 614 | 0.02 | 0.01 | 0.03 | 616 |
| 2027 | 1.2 | 0.93 | 4.2 | 12 | 0.01 | 0.07 | 2.9 | 3.0 | 0.07 | 0.75 | 0.82 | — | 3,734 | 3,734 | 0.21 | 0.26 | 4.2 | 3,820 |
| 2028 | 1.4 | 1.1 | 4.2 | 14 | 0.01 | 0.05 | 3.4 | 3.5 | 0.05 | 0.83 | 0.87 | — | 4,465 | 4,465 | 0.25 | 0.23 | 4.8 | 4,545 |
| 2029 | 1.4 | 1.0 | 4.0 | 13 | 0.01 | 0.05 | 3.4 | 3.5 | 0.04 | 0.82 | 0.87 | — | 4,360 | 4,360 | 0.23 | 0.23 | 4.3 | 4,439 |
| 2030 | 1.2 | 1.00 | 3.7 | 13 | 0.01 | 0.04 | 3.4 | 3.5 | 0.04 | 0.82 | 0.86 | — | 4,269 | 4,269 | 0.22 | 0.22 | 3.8 | 4,344 |
| 2031 | 1.2 | 0.95 | 3.5 | 12 | 0.01 | 0.04 | 3.4 | 3.5 | 0.04 | 0.82 | 0.86 | — | 4,193 | 4,193 | 0.20 | 0.21 | 3.3 | 4,265 |
| 2032 | 1.1 | 0.94 | 3.4 | 12 | 0.01 | 0.04 | 3.4 | 3.5 | 0.04 | 0.83 | 0.86 | — | 4,119 | 4,119 | 0.19 | 0.21 | 2.9 | 4,190 |
| 2033 | 27 | 27 | 0.91 | 3.1 | < 0.005 | 0.02 | 0.80 | 0.82 | 0.02 | 0.19 | 0.21 | — | 942 | 942 | 0.03 | 0.03 | 0.56 | 954 |
| 2034 | 0.53 | 0.53 | < 0.005 | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 4.3 | 4.3 | < 0.005 | < 0.005 | < 0.005 | 4.3 |

## 2.4. Operations Emissions Compared Against Thresholds

### Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Un/Mit. | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 167 | 161 | 70 | 547 | 1.1 | 4.3 | 82 | 86 | 4.2 | 21 | 25 | 1,819 | 147,054 | 148,873 | 189 | 3.7 | 35 | 154,742 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 146 | 141 | 71 | 313 | 1.0 | 4.2 | 82 | 86 | 4.2 | 21 | 25 | 1,819 | 143,053 | 144,872 | 189 | 4.0 | 28 | 150,827 |
| Average Daily (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 149 | 145 | 31 | 386 | 0.75 | 1.1 | 76 | 77 | 1.1 | 19 | 20 | 1,819 | 90,932 | 92,751 | 188 | 3.7 | 31 | 98,577 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Annual (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 27 | 27 | 5.7 | 70 | 0.14 | 0.20 | 14 | 14 | 0.20 | 3.5 | 3.7 | 301 | 15,055 | 15,356 | 31 | 0.61 | 5.1 | 16,321 |

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Sector | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Mobile | 44 | 41 | 19 | 298 | 0.75 | 0.27 | 82 | 82 | 0.25 | 21 | 21 | — | 76,997 | 76,997 | 3.1 | 2.9 | 7.6 | 77,951 |
| Area | 122 | 119 | 42 | 245 | 0.26 | 3.3 | — | 3.3 | 3.3 | — | 3.3 | 0.00 | 50,720 | 50,720 | 0.97 | 0.10 | — | 50,774 |
| Energy | 1.0 | 0.52 | 8.9 | 3.8 | 0.06 | 0.72 | — | 0.72 | 0.72 | — | 0.72 | — | 18,912 | 18,912 | 2.2 | 0.17 | — | 19,019 |
| Water | — | — | — | — | — | — | — | — | — | — | — | 225 | 425 | 650 | 23 | 0.56 | — | 1,394 |
| Waste | — | — | — | — | — | — | — | — | — | — | — | 1,594 | 0.00 | 1,594 | 159 | 0.00 | — | 5,577 |
| Refrig. | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 28 | 28 |
| Total | 167 | 161 | 70 | 547 | 1.1 | 4.3 | 82 | 86 | 4.2 | 21 | 25 | 1,819 | 147,054 | 148,873 | 189 | 3.7 | 35 | 154,742 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Mobile | 44 | 41 | 23 | 293 | 0.72 | 0.27 | 82 | 82 | 0.25 | 21 | 21 | — | 73,602 | 73,602 | 3.4 | 3.2 | 0.20 | 74,645 |
| Area | 102 | 99 | 39 | 17 | 0.25 | 3.2 | — | 3.2 | 3.2 | — | 3.2 | 0.00 | 50,113 | 50,113 | 0.94 | 0.09 | — | 50,165 |
| Energy | 1.0 | 0.52 | 8.9 | 3.8 | 0.06 | 0.72 | — | 0.72 | 0.72 | — | 0.72 | — | 18,912 | 18,912 | 2.2 | 0.17 | — | 19,019 |
| Water | — | — | — | — | — | — | — | — | — | — | — | 225 | 425 | 650 | 23 | 0.56 | — | 1,394 |
| Waste | — | — | — | — | — | — | — | — | — | — | — | 1,594 | 0.00 | 1,594 | 159 | 0.00 | — | 5,577 |
| Refrig. | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 28 | 28 |
| Total | 146 | 141 | 71 | 313 | 1.0 | 4.2 | 82 | 86 | 4.2 | 21 | 25 | 1,819 | 143,053 | 144,872 | 189 | 4.0 | 28 | 150,827 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Mobile | 41 | 38 | 21 | 269 | 0.69 | 0.26 | 76 | 76 | 0.24 | 19 | 20 | — | 70,060 | 70,060 | 3.1 | 3.0 | 3.1 | 71,022 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Area | 107 | 107 | 2.0 | 113 | 0.01 | 0.13 | — | 0.13 | 0.12 | — | 0.12 | 0.00 | 1,535 | 1,535 | 0.04 | < 0.005 | — | 1,537 |
| Energy | 1.0 | 0.52 | 8.9 | 3.8 | 0.06 | 0.72 | — | 0.72 | 0.72 | — | 0.72 | — | 18,912 | 18,912 | 2.2 | 0.17 | — | 19,019 |
| Water | — | — | — | — | — | — | — | — | — | — | — | 225 | 425 | 650 | 23 | 0.56 | — | 1,394 |
| Waste | — | — | — | — | — | — | — | — | — | — | — | 1,594 | 0.00 | 1,594 | 159 | 0.00 | — | 5,577 |
| Refrig. | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 28 | 28 |
| Total | 149 | 145 | 31 | 386 | 0.75 | 1.1 | 76 | 77 | 1.1 | 19 | 20 | 1,819 | 90,932 | 92,751 | 188 | 3.7 | 31 | 98,577 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Mobile | 7.5 | 7.0 | 3.7 | 49 | 0.13 | 0.05 | 14 | 14 | 0.04 | 3.5 | 3.6 | — | 11,599 | 11,599 | 0.51 | 0.49 | 0.52 | 11,759 |
| Area | 20 | 19 | 0.37 | 21 | < 0.005 | 0.02 | — | 0.02 | 0.02 | — | 0.02 | 0.00 | 254 | 254 | 0.01 | < 0.005 | — | 255 |
| Energy | 0.19 | 0.09 | 1.6 | 0.69 | 0.01 | 0.13 | — | 0.13 | 0.13 | — | 0.13 | — | 3,131 | 3,131 | 0.37 | 0.03 | — | 3,149 |
| Water | — | — | — | — | — | — | — | — | — | — | — | 37 | 70 | 108 | 3.8 | 0.09 | — | 231 |
| Waste | — | — | — | — | — | — | — | — | — | — | — | 264 | 0.00 | 264 | 26 | 0.00 | — | 923 |
| Refrig. | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 4.6 | 4.6 |
| Total | 27 | 27 | 5.7 | 70 | 0.14 | 0.20 | 14 | 14 | 0.20 | 3.5 | 3.7 | 301 | 15,055 | 15,356 | 31 | 0.61 | 5.1 | 16,321 |

# 3. Construction Emissions Details

## 3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 2.7 | 2.3 | 21 | 19 | 0.03 | 0.84 | — | 0.84 | 0.78 | — | 0.78 | — | 3,427 | 3,427 | 0.14 | 0.03 | — | 3,438 |
| Demolition | — | — | — | — | — | — | 0.00 | 0.00 | — | 0.00 | 0.00 | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 2.7 | 2.3 | 21 | 19 | 0.03 | 0.84 | — | 0.84 | 0.78 | — | 0.78 | — | 3,427 | 3,427 | 0.14 | 0.03 | — | 3,438 |
| Demolition | — | — | — | — | — | — | 0.00 | 0.00 | — | 0.00 | 0.00 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.75 | 0.63 | 5.7 | 5.2 | 0.01 | 0.23 | — | 0.23 | 0.21 | — | 0.21 | — | 939 | 939 | 0.04 | 0.01 | — | 942 |
| Demolition | — | — | — | — | — | — | 0.00 | 0.00 | — | 0.00 | 0.00 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.14 | 0.11 | 1.0 | 0.95 | < 0.005 | 0.04 | — | 0.04 | 0.04 | — | 0.04 | — | 155 | 155 | 0.01 | < 0.005 | — | 156 |
| Demolition | — | — | — | — | — | — | 0.00 | 0.00 | — | 0.00 | 0.00 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Worker | 0.04 | 0.04 | 0.03 | 0.52 | 0.00 | 0.00 | 0.12 | 0.12 | 0.00 | 0.03 | 0.03 | — | 133 | 133 | < 0.005 | < 0.005 | 0.46 | 134 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.04 | 0.04 | 0.03 | 0.47 | 0.00 | 0.00 | 0.12 | 0.12 | 0.00 | 0.03 | 0.03 | — | 126 | 126 | < 0.005 | < 0.005 | 0.01 | 127 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.01 | 0.01 | 0.01 | 0.13 | 0.00 | 0.00 | 0.03 | 0.03 | 0.00 | 0.01 | 0.01 | — | 34 | 34 | < 0.005 | < 0.005 | 0.05 | 35 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.02 | 0.00 | 0.00 | 0.01 | 0.01 | 0.00 | < 0.005 | < 0.005 | — | 5.7 | 5.7 | < 0.005 | < 0.005 | 0.01 | 5.8 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 3.7 | 3.1 | 29 | 29 | 0.05 | 1.2 | — | 1.2 | 1.1 | — | 1.1 | — | 5,298 | 5,298 | 0.21 | 0.04 | — | 5,316 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Dust From Material Movement | — | — | — | — | — | — | 20 | 20 | — | 10 | 10 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.62 | 0.52 | 4.8 | 4.7 | 0.01 | 0.20 | — | 0.20 | 0.19 | — | 0.19 | — | 871 | 871 | 0.04 | 0.01 | — | 874 |
| Dust From Material Movement | — | — | — | — | — | — | 3.2 | 3.2 | — | 1.7 | 1.7 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.11 | 0.09 | 0.87 | 0.86 | < 0.005 | 0.04 | — | 0.04 | 0.03 | — | 0.03 | — | 144 | 144 | 0.01 | < 0.005 | — | 145 |
| Dust From Material Movement | — | — | — | — | — | — | 0.59 | 0.59 | — | 0.30 | 0.30 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.05 | 0.04 | 0.03 | 0.61 | 0.00 | 0.00 | 0.14 | 0.14 | 0.00 | 0.03 | 0.03 | — | 155 | 155 | < 0.005 | < 0.005 | 0.54 | 156 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.01 | 0.01 | 0.01 | 0.09 | 0.00 | 0.00 | 0.02 | 0.02 | 0.00 | 0.01 | 0.01 | — | 24 | 24 | < 0.005 | < 0.005 | 0.04 | 24 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.02 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 4.0 | 4.0 | < 0.005 | < 0.005 | 0.01 | 4.1 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.5. Grading (2026) - Unmitigated

### Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 3.6 | 3.0 | 27 | 28 | 0.06 | 1.1 | — | 1.1 | 1.0 | — | 1.0 | — | 6,599 | 6,599 | 0.27 | 0.05 | — | 6,621 |
| Dust From Material Movement | — | — | — | — | — | — | 9.2 | 9.2 | — | 3.7 | 3.7 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 3.6 | 3.0 | 27 | 28 | 0.06 | 1.1 | — | 1.1 | 1.0 | — | 1.0 | — | 6,599 | 6,599 | 0.27 | 0.05 | — | 6,621 |
| Dust From Material Movement | — | — | — | — | — | — | 9.2 | 9.2 | — | 3.7 | 3.7 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.99 | 0.83 | 7.4 | 7.5 | 0.02 | 0.31 | — | 0.31 | 0.28 | — | 0.28 | — | 1,795 | 1,795 | 0.07 | 0.01 | — | 1,801 |
| Dust From Material Movement | — | — | — | — | — | — | 2.5 | 2.5 | — | 0.99 | 0.99 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.18 | 0.15 | 1.4 | 1.4 | < 0.005 | 0.06 | — | 0.06 | 0.05 | — | 0.05 | — | 297 | 297 | 0.01 | < 0.005 | — | 298 |
| Dust From Material Movement | — | — | — | — | — | — | 0.46 | 0.46 | — | 0.18 | 0.18 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.06 | 0.05 | 0.04 | 0.69 | 0.00 | 0.00 | 0.17 | 0.17 | 0.00 | 0.04 | 0.04 | — | 177 | 177 | < 0.005 | < 0.005 | 0.62 | 178 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.06 | 0.05 | 0.04 | 0.63 | 0.00 | 0.00 | 0.17 | 0.17 | 0.00 | 0.04 | 0.04 | — | 168 | 168 | < 0.005 | 0.01 | 0.02 | 170 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.02 | 0.01 | 0.01 | 0.17 | 0.00 | 0.00 | 0.04 | 0.04 | 0.00 | 0.01 | 0.01 | — | 46 | 46 | < 0.005 | < 0.005 | 0.07 | 46 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.03 | 0.00 | 0.00 | 0.01 | 0.01 | 0.00 | < 0.005 | < 0.005 | — | 7.6 | 7.6 | < 0.005 | < 0.005 | 0.01 | 7.7 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.7. Grading (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 3.5 | 2.9 | 26 | 27 | 0.06 | 1.0 | — | 1.0 | 0.96 | — | 0.96 | — | 6,598 | 6,598 | 0.27 | 0.05 | — | 6,621 |
| Dust From Material Movement | — | — | — | — | — | — | 9.2 | 9.2 | — | 3.7 | 3.7 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.54 | 0.46 | 4.0 | 4.2 | 0.01 | 0.16 | — | 0.16 | 0.15 | — | 0.15 | — | 1,020 | 1,020 | 0.04 | 0.01 | — | 1,024 |
| Dust From Material Movement | — | — | — | — | — | — | 1.4 | 1.4 | — | 0.56 | 0.56 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.10 | 0.08 | 0.72 | 0.77 | < 0.005 | 0.03 | — | 0.03 | 0.03 | — | 0.03 | — | 169 | 169 | 0.01 | < 0.005 | — | 169 |
| Dust From Material Movement | — | — | — | — | — | — | 0.26 | 0.26 | — | 0.10 | 0.10 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.06 | 0.05 | 0.04 | 0.60 | 0.00 | 0.00 | 0.17 | 0.17 | 0.00 | 0.04 | 0.04 | — | 165 | 165 | < 0.005 | 0.01 | 0.01 | 167 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.01 | 0.01 | 0.01 | 0.09 | 0.00 | 0.00 | 0.02 | 0.02 | 0.00 | 0.01 | 0.01 | — | 25 | 25 | < 0.005 | < 0.005 | 0.04 | 26 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.02 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 4.2 | 4.2 | < 0.005 | < 0.005 | 0.01 | 4.3 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.9. Building Construction (2027) - Unmitigated

### Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.2 | 1.0 | 9.4 | 13 | 0.02 | 0.34 | — | 0.34 | 0.31 | — | 0.31 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.2 | 1.0 | 9.4 | 13 | 0.02 | 0.34 | — | 0.34 | 0.31 | — | 0.31 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.69 | 0.58 | 5.3 | 7.2 | 0.01 | 0.19 | — | 0.19 | 0.17 | — | 0.17 | — | 1,342 | 1,342 | 0.05 | 0.01 | — | 1,346 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.13 | 0.11 | 0.96 | 1.3 | < 0.005 | 0.03 | — | 0.03 | 0.03 | — | 0.03 | — | 222 | 222 | 0.01 | < 0.005 | — | 223 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 8.0 | 7.2 | 5.2 | 94 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 25,057 | 25,057 | 0.38 | 0.19 | 80 | 25,204 |
| Vendor | 2.2 | 0.40 | 19 | 14 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 12,286 | 12,286 | 1.7 | 1.8 | 25 | 12,895 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 8.0 | 7.1 | 6.3 | 86 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 23,705 | 23,705 | 0.51 | 0.93 | 2.1 | 23,998 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Vendor | 2.2 | 0.39 | 20 | 14 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 12,282 | 12,282 | 1.7 | 1.8 | 0.65 | 12,866 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 4.4 | 3.8 | 3.0 | 47 | 0.00 | 0.00 | 13 | 13 | 0.00 | 3.0 | 3.0 | — | 13,291 | 13,291 | 0.25 | 0.52 | 19 | 13,472 |
| Vendor | 1.2 | 0.22 | 11 | 7.8 | 0.04 | 0.04 | 1.7 | 1.8 | 0.04 | 0.50 | 0.54 | — | 6,875 | 6,875 | 0.93 | 1.0 | 6.1 | 7,208 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.80 | 0.70 | 0.55 | 8.5 | 0.00 | 0.00 | 2.4 | 2.4 | 0.00 | 0.55 | 0.55 | — | 2,200 | 2,200 | 0.04 | 0.09 | 3.2 | 2,230 |
| Vendor | 0.22 | 0.04 | 2.0 | 1.4 | 0.01 | 0.01 | 0.32 | 0.33 | 0.01 | 0.09 | 0.10 | — | 1,138 | 1,138 | 0.15 | 0.17 | 1.0 | 1,193 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.11. Building Construction (2028) - Unmitigated

### Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.2 | 0.99 | 8.9 | 13 | 0.02 | 0.30 | — | 0.30 | 0.28 | — | 0.28 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,406 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.2 | 0.99 | 8.9 | 13 | 0.02 | 0.30 | — | 0.30 | 0.28 | — | 0.28 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,406 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.85 | 0.71 | 6.4 | 9.3 | 0.02 | 0.22 | — | 0.22 | 0.20 | — | 0.20 | — | 1,717 | 1,717 | 0.07 | 0.01 | — | 1,723 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.15 | 0.13 | 1.2 | 1.7 | < 0.005 | 0.04 | — | 0.04 | 0.04 | — | 0.04 | — | 284 | 284 | 0.01 | < 0.005 | — | 285 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 7.9 | 7.0 | 4.4 | 90 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 24,628 | 24,628 | 0.38 | 0.19 | 72 | 24,767 |
| Vendor | 2.0 | 0.40 | 17 | 14 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 11,919 | 11,919 | 1.6 | 1.7 | 23 | 12,499 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 7.8 | 6.8 | 5.5 | 81 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 23,300 | 23,300 | 0.44 | 0.93 | 1.9 | 23,591 |
| Vendor | 2.0 | 0.38 | 18 | 14 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 11,916 | 11,916 | 1.6 | 1.7 | 0.58 | 12,475 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 5.5 | 4.8 | 3.8 | 57 | 0.00 | 0.00 | 17 | 17 | 0.00 | 3.9 | 3.9 | — | 16,718 | 16,718 | 0.32 | 0.14 | 22 | 16,789 |
| Vendor | 1.4 | 0.28 | 13 | 9.7 | 0.06 | 0.06 | 2.2 | 2.3 | 0.06 | 0.64 | 0.70 | — | 8,536 | 8,536 | 1.1 | 1.2 | 7.0 | 8,943 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 1.00 | 0.88 | 0.70 | 10 | 0.00 | 0.00 | 3.0 | 3.0 | 0.00 | 0.71 | 0.71 | — | 2,768 | 2,768 | 0.05 | 0.02 | 3.7 | 2,780 |
| Vendor | 0.26 | 0.05 | 2.3 | 1.8 | 0.01 | 0.01 | 0.41 | 0.42 | 0.01 | 0.12 | 0.13 | — | 1,413 | 1,413 | 0.19 | 0.21 | 1.2 | 1,481 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.13. Building Construction (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.2 | 0.97 | 8.6 | 13 | 0.02 | 0.28 | — | 0.28 | 0.25 | — | 0.25 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.2 | 0.97 | 8.6 | 13 | 0.02 | 0.28 | — | 0.28 | 0.25 | — | 0.25 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.82 | 0.69 | 6.1 | 9.2 | 0.02 | 0.20 | — | 0.20 | 0.18 | — | 0.18 | — | 1,712 | 1,712 | 0.07 | 0.01 | — | 1,718 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.15 | 0.13 | 1.1 | 1.7 | < 0.005 | 0.04 | — | 0.04 | 0.03 | — | 0.03 | — | 283 | 283 | 0.01 | < 0.005 | — | 284 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 7.6 | 6.8 | 4.4 | 85 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 24,223 | 24,223 | 0.32 | 0.19 | 64 | 24,352 |
| Vendor | 1.9 | 0.32 | 16 | 13 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 11,518 | 11,518 | 1.5 | 1.7 | 20 | 12,093 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 7.6 | 6.6 | 5.4 | 78 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 22,917 | 22,917 | 0.44 | 0.93 | 1.7 | 23,208 |
| Vendor | 1.9 | 0.30 | 17 | 13 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 11,517 | 11,517 | 1.5 | 1.7 | 0.51 | 12,073 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 5.3 | 4.7 | 3.8 | 54 | 0.00 | 0.00 | 17 | 17 | 0.00 | 3.9 | 3.9 | — | 16,398 | 16,398 | 0.27 | 0.14 | 20 | 16,465 |
| Vendor | 1.4 | 0.21 | 12 | 9.4 | 0.06 | 0.06 | 2.2 | 2.3 | 0.06 | 0.64 | 0.70 | — | 8,227 | 8,227 | 1.1 | 1.2 | 6.1 | 8,630 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.97 | 0.86 | 0.69 | 9.9 | 0.00 | 0.00 | 3.0 | 3.0 | 0.00 | 0.71 | 0.71 | — | 2,715 | 2,715 | 0.05 | 0.02 | 3.3 | 2,726 |
| Vendor | 0.25 | 0.04 | 2.1 | 1.7 | 0.01 | 0.01 | 0.40 | 0.41 | 0.01 | 0.12 | 0.13 | — | 1,362 | 1,362 | 0.18 | 0.21 | 1.0 | 1,429 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.15. Building Construction (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.1 | 0.94 | 8.4 | 13 | 0.02 | 0.26 | — | 0.26 | 0.24 | — | 0.24 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.1 | 0.94 | 8.4 | 13 | 0.02 | 0.26 | — | 0.26 | 0.24 | — | 0.24 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.80 | 0.67 | 6.0 | 9.2 | 0.02 | 0.19 | — | 0.19 | 0.17 | — | 0.17 | — | 1,712 | 1,712 | 0.07 | 0.01 | — | 1,718 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.15 | 0.12 | 1.1 | 1.7 | < 0.005 | 0.03 | — | 0.03 | 0.03 | — | 0.03 | — | 283 | 283 | 0.01 | < 0.005 | — | 284 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 6.6 | 6.5 | 4.3 | 82 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 23,839 | 23,839 | 0.32 | 0.19 | 57 | 23,961 |
| Vendor | 1.7 | 0.31 | 15 | 13 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 11,106 | 11,106 | 1.4 | 1.7 | 17 | 11,653 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 6.6 | 6.5 | 5.4 | 74 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 22,553 | 22,553 | 0.44 | 0.19 | 1.5 | 22,622 |
| Vendor | 1.7 | 0.30 | 16 | 13 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 11,105 | 11,105 | 1.4 | 1.7 | 0.45 | 11,636 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 4.7 | 4.6 | 3.2 | 51 | 0.00 | 0.00 | 17 | 17 | 0.00 | 3.9 | 3.9 | — | 16,138 | 16,138 | 0.27 | 0.14 | 18 | 16,203 |
| Vendor | 1.2 | 0.21 | 11 | 9.1 | 0.06 | 0.06 | 2.2 | 2.3 | 0.06 | 0.64 | 0.70 | — | 7,932 | 7,932 | 1.0 | 1.2 | 5.4 | 8,316 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.85 | 0.83 | 0.59 | 9.3 | 0.00 | 0.00 | 3.0 | 3.0 | 0.00 | 0.71 | 0.71 | — | 2,672 | 2,672 | 0.05 | 0.02 | 2.9 | 2,683 |
| Vendor | 0.23 | 0.04 | 2.0 | 1.7 | 0.01 | 0.01 | 0.40 | 0.41 | 0.01 | 0.12 | 0.13 | — | 1,313 | 1,313 | 0.17 | 0.20 | 0.89 | 1,377 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.17. Building Construction (2031) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.1 | 0.92 | 8.1 | 13 | 0.02 | 0.24 | — | 0.24 | 0.22 | — | 0.22 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.1 | 0.92 | 8.1 | 13 | 0.02 | 0.24 | — | 0.24 | 0.22 | — | 0.22 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.78 | 0.66 | 5.8 | 9.2 | 0.02 | 0.17 | — | 0.17 | 0.16 | — | 0.16 | — | 1,712 | 1,712 | 0.07 | 0.01 | — | 1,718 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.14 | 0.12 | 1.1 | 1.7 | < 0.005 | 0.03 | — | 0.03 | 0.03 | — | 0.03 | — | 283 | 283 | 0.01 | < 0.005 | — | 284 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Worker | 6.5 | 6.3 | 3.5 | 79 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 23,605 | 23,605 | 0.32 | 0.19 | 50 | 23,720 |
| Vendor | 1.6 | 0.31 | 14 | 12 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 10,691 | 10,691 | 1.2 | 1.6 | 15 | 11,208 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 6.3 | 6.2 | 4.6 | 72 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 22,330 | 22,330 | 0.38 | 0.19 | 1.3 | 22,397 |
| Vendor | 1.6 | 0.30 | 15 | 12 | 0.08 | 0.08 | 3.2 | 3.3 | 0.08 | 0.91 | 0.99 | — | 10,692 | 10,692 | 1.2 | 1.6 | 0.39 | 11,194 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 4.5 | 4.3 | 3.2 | 49 | 0.00 | 0.00 | 17 | 17 | 0.00 | 3.9 | 3.9 | — | 15,978 | 15,978 | 0.27 | 0.14 | 15 | 16,041 |
| Vendor | 1.2 | 0.21 | 10 | 8.8 | 0.06 | 0.06 | 2.2 | 2.3 | 0.06 | 0.64 | 0.70 | — | 7,637 | 7,637 | 0.89 | 1.1 | 4.6 | 8,000 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.82 | 0.79 | 0.58 | 9.0 | 0.00 | 0.00 | 3.0 | 3.0 | 0.00 | 0.71 | 0.71 | — | 2,645 | 2,645 | 0.05 | 0.02 | 2.6 | 2,656 |
| Vendor | 0.21 | 0.04 | 1.9 | 1.6 | 0.01 | 0.01 | 0.40 | 0.41 | 0.01 | 0.12 | 0.13 | — | 1,264 | 1,264 | 0.15 | 0.19 | 0.76 | 1,324 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.19. Building Construction (2032) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.1 | 0.90 | 7.9 | 13 | 0.02 | 0.22 | — | 0.22 | 0.21 | — | 0.21 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.1 | 0.90 | 7.9 | 13 | 0.02 | 0.22 | — | 0.22 | 0.21 | — | 0.21 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.77 | 0.64 | 5.6 | 9.2 | 0.02 | 0.16 | — | 0.16 | 0.15 | — | 0.15 | — | 1,717 | 1,717 | 0.07 | 0.01 | — | 1,723 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.14 | 0.12 | 1.0 | 1.7 | < 0.005 | 0.03 | — | 0.03 | 0.03 | — | 0.03 | — | 284 | 284 | 0.01 | < 0.005 | — | 285 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 6.3 | 6.2 | 3.5 | 76 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 23,278 | 23,278 | 0.32 | 0.19 | 44 | 23,387 |
| Vendor | 1.5 | 0.31 | 13 | 12 | 0.08 | 0.08 | 3.1 | 3.2 | 0.08 | 0.91 | 0.99 | — | 10,279 | 10,279 | 1.2 | 1.6 | 13 | 10,791 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Worker | 6.3 | 6.1 | 4.5 | 68 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 22,020 | 22,020 | 0.38 | 0.19 | 1.1 | 22,087 |
| Vendor | 1.5 | 0.30 | 14 | 12 | 0.08 | 0.08 | 3.1 | 3.2 | 0.08 | 0.91 | 0.99 | — | 10,280 | 10,280 | 1.2 | 1.6 | 0.33 | 10,780 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 4.4 | 4.3 | 3.2 | 47 | 0.00 | 0.00 | 17 | 17 | 0.00 | 3.9 | 3.9 | — | 15,800 | 15,800 | 0.23 | 0.14 | 14 | 15,860 |
| Vendor | 1.1 | 0.21 | 9.7 | 8.5 | 0.06 | 0.06 | 2.2 | 2.2 | 0.06 | 0.64 | 0.70 | — | 7,363 | 7,363 | 0.83 | 1.1 | 3.9 | 7,725 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.80 | 0.79 | 0.58 | 8.7 | 0.00 | 0.00 | 3.0 | 3.0 | 0.00 | 0.71 | 0.71 | — | 2,616 | 2,616 | 0.04 | 0.02 | 2.2 | 2,626 |
| Vendor | 0.19 | 0.04 | 1.8 | 1.6 | 0.01 | 0.01 | 0.40 | 0.41 | 0.01 | 0.12 | 0.13 | — | 1,219 | 1,219 | 0.14 | 0.19 | 0.65 | 1,279 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.21. Building Construction (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.0 | 0.88 | 7.7 | 13 | 0.02 | 0.20 | — | 0.20 | 0.19 | — | 0.19 | — | 2,397 | 2,397 | 0.10 | 0.02 | — | 2,405 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Off-Road | 0.12 | 0.10 | 0.87 | 1.5 | < 0.005 | 0.02 | — | 0.02 | 0.02 | — | 0.02 | — | 272 | 272 | 0.01 | < 0.005 | — | 273 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.02 | 0.02 | 0.16 | 0.26 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 45 | 45 | < 0.005 | < 0.005 | — | 45 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 6.1 | 5.9 | 4.4 | 66 | 0.00 | 0.00 | 24 | 24 | 0.00 | 5.6 | 5.6 | — | 21,738 | 21,738 | 0.38 | 0.19 | 0.99 | 21,805 |
| Vendor | 1.4 | 0.30 | 13 | 12 | 0.08 | 0.08 | 3.1 | 3.2 | 0.08 | 0.91 | 0.99 | — | 9,872 | 9,872 | 1.1 | 1.5 | 0.28 | 10,347 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.68 | 0.67 | 0.41 | 7.3 | 0.00 | 0.00 | 2.6 | 2.6 | 0.00 | 0.62 | 0.62 | — | 2,472 | 2,472 | 0.04 | 0.02 | 1.9 | 2,481 |
| Vendor | 0.16 | 0.03 | 1.4 | 1.3 | 0.01 | 0.01 | 0.34 | 0.35 | 0.01 | 0.10 | 0.11 | — | 1,120 | 1,120 | 0.12 | 0.17 | 0.52 | 1,175 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.12 | 0.12 | 0.08 | 1.3 | 0.00 | 0.00 | 0.48 | 0.48 | 0.00 | 0.11 | 0.11 | — | 409 | 409 | 0.01 | < 0.005 | 0.31 | 411 |
| Vendor | 0.03 | 0.01 | 0.26 | 0.24 | < 0.005 | < 0.005 | 0.06 | 0.06 | < 0.005 | 0.02 | 0.02 | — | 185 | 185 | 0.02 | 0.03 | 0.09 | 194 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.23. Paving (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.70 | 0.59 | 5.9 | 9.8 | 0.01 | 0.18 | — | 0.18 | 0.17 | — | 0.17 | — | 1,511 | 1,511 | 0.06 | 0.01 | — | 1,516 |
| Paving | 0.00 | 0.00 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.70 | 0.59 | 5.9 | 9.8 | 0.01 | 0.18 | — | 0.18 | 0.17 | — | 0.17 | — | 1,511 | 1,511 | 0.06 | 0.01 | — | 1,516 |
| Paving | 0.00 | 0.00 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.21 | 0.18 | 1.8 | 3.0 | < 0.005 | 0.06 | — | 0.06 | 0.05 | — | 0.05 | — | 455 | 455 | 0.02 | < 0.005 | — | 457 |
| Paving | 0.00 | 0.00 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Off-Road Equipment | 0.04 | 0.03 | 0.33 | 0.54 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | — | 75 | 75 | < 0.005 | < 0.005 | — | 76 |
| Paving | 0.00 | 0.00 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.03 | 0.03 | 0.02 | 0.38 | 0.00 | 0.00 | 0.12 | 0.12 | 0.00 | 0.03 | 0.03 | — | 120 | 120 | < 0.005 | < 0.005 | 0.20 | 120 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.03 | 0.03 | 0.02 | 0.34 | 0.00 | 0.00 | 0.12 | 0.12 | 0.00 | 0.03 | 0.03 | — | 113 | 113 | < 0.005 | < 0.005 | 0.01 | 114 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.01 | 0.01 | 0.01 | 0.10 | 0.00 | 0.00 | 0.04 | 0.04 | 0.00 | 0.01 | 0.01 | — | 34 | 34 | < 0.005 | < 0.005 | 0.03 | 34 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.02 | 0.00 | 0.00 | 0.01 | 0.01 | 0.00 | < 0.005 | < 0.005 | — | 5.7 | 5.7 | < 0.005 | < 0.005 | < 0.005 | 5.7 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.25. Architectural Coating (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.11 | 0.09 | 0.76 | 1.1 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | — | 134 | 134 | 0.01 | < 0.005 | — | 134 |
| Architectural Coatings | 492 | 492 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.11 | 0.09 | 0.76 | 1.1 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | — | 134 | 134 | 0.01 | < 0.005 | — | 134 |
| Architectural Coatings | 492 | 492 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.03 | 0.03 | 0.23 | 0.33 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 40 | 40 | < 0.005 | < 0.005 | — | 40 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Architectural Coating | 146 | 146 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.01 | < 0.005 | 0.04 | 0.06 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 6.6 | 6.6 | < 0.005 | < 0.005 | — | 6.6 |
| Architectural Coatings | 27 | 27 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 1.2 | 1.2 | 0.69 | 15 | 0.00 | 0.00 | 4.8 | 4.8 | 0.00 | 1.1 | 1.1 | — | 4,596 | 4,596 | 0.05 | 0.04 | 7.6 | 4,616 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 1.2 | 1.2 | 0.89 | 13 | 0.00 | 0.00 | 4.8 | 4.8 | 0.00 | 1.1 | 1.1 | — | 4,348 | 4,348 | 0.08 | 0.04 | 0.20 | 4,361 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.36 | 0.35 | 0.22 | 3.8 | 0.00 | 0.00 | 1.4 | 1.4 | 0.00 | 0.32 | 0.32 | — | 1,296 | 1,296 | 0.02 | 0.01 | 0.98 | 1,300 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.07 | 0.06 | 0.04 | 0.69 | 0.00 | 0.00 | 0.25 | 0.25 | 0.00 | 0.06 | 0.06 | — | 214 | 214 | < 0.005 | < 0.005 | 0.16 | 215 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.27. Architectural Coating (2034) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.11 | 0.09 | 0.76 | 1.1 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | — | 134 | 134 | 0.01 | < 0.005 | — | 134 |
| Architectural Coatings | 492 | 492 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | < 0.005 | < 0.005 | < 0.005 | 0.01 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 0.78 | 0.78 | < 0.005 | < 0.005 | — | 0.79 |
| Architectural Coatings | 2.9 | 2.9 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 0.13 | 0.13 | < 0.005 | < 0.005 | — | 0.13 |
| Architectural Coatings | 0.53 | 0.53 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 1.2 | 1.1 | 0.74 | 13 | 0.00 | 0.00 | 4.8 | 4.8 | 0.00 | 1.1 | 1.1 | — | 4,296 | 4,296 | 0.06 | 0.04 | 0.17 | 4,309 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.01 | 0.01 | < 0.005 | 0.07 | 0.00 | 0.00 | 0.03 | 0.03 | 0.00 | 0.01 | 0.01 | — | 25 | 25 | < 0.005 | < 0.005 | 0.02 | 25 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.01 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 4.2 | 4.2 | < 0.005 | < 0.005 | < 0.005 | 4.2 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

# 4. Operations Emissions Details

## 4.1. Mobile Emissions by Land Use

### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 22 | 20 | 9.7 | 149 | 0.38 | 0.13 | 41 | 41 | 0.13 | 10 | 11 | — | 38,498 | 38,498 | 1.5 | 1.5 | 3.8 | 38,975 |
| Condo/Townhouse High Rise | 22 | 20 | 9.7 | 149 | 0.38 | 0.13 | 41 | 41 | 0.13 | 10 | 11 | — | 38,498 | 38,498 | 1.5 | 1.5 | 3.8 | 38,975 |
| Total | 44 | 41 | 19 | 298 | 0.75 | 0.27 | 82 | 82 | 0.25 | 21 | 21 | — | 76,997 | 76,997 | 3.1 | 2.9 | 7.6 | 77,951 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 22 | 20 | 11 | 146 | 0.36 | 0.13 | 41 | 41 | 0.13 | 10 | 11 | — | 36,801 | 36,801 | 1.7 | 1.6 | 0.10 | 37,323 |
| Condo/Townhouse High Rise | 22 | 20 | 11 | 146 | 0.36 | 0.13 | 41 | 41 | 0.13 | 10 | 11 | — | 36,801 | 36,801 | 1.7 | 1.6 | 0.10 | 37,323 |
| Total | 44 | 41 | 23 | 293 | 0.72 | 0.27 | 82 | 82 | 0.25 | 21 | 21 | — | 73,602 | 73,602 | 3.4 | 3.2 | 0.20 | 74,645 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 3.7 | 3.5 | 1.9 | 25 | 0.06 | 0.02 | 6.9 | 7.0 | 0.02 | 1.8 | 1.8 | — | 5,800 | 5,800 | 0.26 | 0.25 | 0.26 | 5,879 |
| Condo/Townhouse High Rise | 3.7 | 3.5 | 1.9 | 25 | 0.06 | 0.02 | 6.9 | 7.0 | 0.02 | 1.8 | 1.8 | — | 5,800 | 5,800 | 0.26 | 0.25 | 0.26 | 5,879 |
| Total | 7.5 | 7.0 | 3.7 | 49 | 0.13 | 0.05 | 14 | 14 | 0.04 | 3.5 | 3.6 | — | 11,599 | 11,599 | 0.51 | 0.49 | 0.52 | 11,759 |

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | 3,813 | 3,813 | 0.62 | 0.07 | — | 3,851 |
| Condo/Townhouse High Rise | — | — | — | — | — | — | — | — | — | — | — | — | 3,813 | 3,813 | 0.62 | 0.07 | — | 3,851 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | 7,626 | 7,626 | 1.2 | 0.15 | — | 7,701 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | 3,813 | 3,813 | 0.62 | 0.07 | — | 3,851 |

| | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Condo/Townhouse | — | — | — | — | — | — | — | — | — | — | — | — | 3,813 | 3,813 | 0.62 | 0.07 | — | 3,851 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | 7,626 | 7,626 | 1.2 | 0.15 | — | 7,701 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | 631 | 631 | 0.10 | 0.01 | — | 638 |
| Condo/Townhouse High Rise | — | — | — | — | — | — | — | — | — | — | — | — | 631 | 631 | 0.10 | 0.01 | — | 638 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | 1,263 | 1,263 | 0.20 | 0.02 | — | 1,275 |

### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 0.52 | 0.26 | 4.4 | 1.9 | 0.03 | 0.36 | — | 0.36 | 0.36 | — | 0.36 | — | 5,643 | 5,643 | 0.50 | 0.01 | — | 5,659 |
| Condo/Townhouse High Rise | 0.52 | 0.26 | 4.4 | 1.9 | 0.03 | 0.36 | — | 0.36 | 0.36 | — | 0.36 | — | 5,643 | 5,643 | 0.50 | 0.01 | — | 5,659 |
| Total | 1.0 | 0.52 | 8.9 | 3.8 | 0.06 | 0.72 | — | 0.72 | 0.72 | — | 0.72 | — | 11,286 | 11,286 | 1.00 | 0.02 | — | 11,318 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.52 | 0.26 | 4.4 | 1.9 | 0.03 | 0.36 | — | 0.36 | 0.36 | — | 0.36 | — | 5,643 | 5,643 | 0.50 | 0.01 | — | 5,659 |
| Condo/Townhouse High Rise | 0.52 | 0.26 | 4.4 | 1.9 | 0.03 | 0.36 | — | 0.36 | 0.36 | — | 0.36 | — | 5,643 | 5,643 | 0.50 | 0.01 | — | 5,659 |
| Total | 1.0 | 0.52 | 8.9 | 3.8 | 0.06 | 0.72 | — | 0.72 | 0.72 | — | 0.72 | — | 11,286 | 11,286 | 1.00 | 0.02 | — | 11,318 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 0.09 | 0.05 | 0.81 | 0.35 | 0.01 | 0.07 | — | 0.07 | 0.07 | — | 0.07 | — | 934 | 934 | 0.08 | < 0.005 | — | 937 |
| Condo/Townhouse High Rise | 0.09 | 0.05 | 0.81 | 0.35 | 0.01 | 0.07 | — | 0.07 | 0.07 | — | 0.07 | — | 934 | 934 | 0.08 | < 0.005 | — | 937 |
| Total | 0.19 | 0.09 | 1.6 | 0.69 | 0.01 | 0.13 | — | 0.13 | 0.13 | — | 0.13 | — | 1,869 | 1,869 | 0.17 | < 0.005 | — | 1,874 |

## 4.3. Area Emissions by Source

### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Source | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Hearths | 4.6 | 2.3 | 39 | 17 | 0.25 | 3.2 | — | 3.2 | 3.2 | — | 3.2 | 0.00 | 50,113 | 50,113 | 0.94 | 0.09 | — | 50,165 |
| Consumer Products | 82 | 82 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Architectural Coating | 15 | 15 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Landscape Equipment | 21 | 20 | 2.1 | 228 | 0.01 | 0.10 | — | 0.10 | 0.08 | — | 0.08 | — | 607 | 607 | 0.03 | 0.01 | — | 609 |
| Total | 122 | 119 | 42 | 245 | 0.26 | 3.3 | — | 3.3 | 3.3 | — | 3.3 | 0.00 | 50,720 | 50,720 | 0.97 | 0.10 | — | 50,774 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Hearths | 4.6 | 2.3 | 39 | 17 | 0.25 | 3.2 | — | 3.2 | 3.2 | — | 3.2 | 0.00 | 50,113 | 50,113 | 0.94 | 0.09 | — | 50,165 |
| Consumer Products | 82 | 82 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Architectural Coatings | 15 | 15 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | 102 | 99 | 39 | 17 | 0.25 | 3.2 | — | 3.2 | 3.2 | — | 3.2 | 0.00 | 50,113 | 50,113 | 0.94 | 0.09 | — | 50,165 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Hearths | 0.02 | 0.01 | 0.18 | 0.08 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | 0.00 | 205 | 205 | < 0.005 | < 0.005 | — | 205 |
| Consumer Products | 15 | 15 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Architectural Coatings | 2.7 | 2.7 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Landscape Equipment | 1.9 | 1.8 | 0.19 | 21 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | — | 50 | 50 | < 0.005 | < 0.005 | — | 50 |
| Total | 20 | 19 | 0.37 | 21 | < 0.005 | 0.02 | — | 0.02 | 0.02 | — | 0.02 | 0.00 | 254 | 254 | 0.01 | < 0.005 | — | 255 |

## 4.4. Water Emissions by Land Use

### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 112 | 212 | 325 | 12 | 0.28 | — | 697 |
| Condo/Townhouse High Rise | — | — | — | — | — | — | — | — | — | — | — | 112 | 212 | 325 | 12 | 0.28 | — | 697 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 225 | 425 | 650 | 23 | 0.56 | — | 1,394 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 112 | 212 | 325 | 12 | 0.28 | — | 697 |
| Condo/Townhouse High Rise | — | — | — | — | — | — | — | — | — | — | — | 112 | 212 | 325 | 12 | 0.28 | — | 697 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 225 | 425 | 650 | 23 | 0.56 | — | 1,394 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 19 | 35 | 54 | 1.9 | 0.05 | — | 115 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Condo/Townhouse | — | — | — | — | — | — | — | — | — | — | — | 19 | 35 | 54 | 1.9 | 0.05 | — | 115 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 37 | 70 | 108 | 3.8 | 0.09 | — | 231 |

## 4.5. Waste Emissions by Land Use

### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 797 | 0.00 | 797 | 80 | 0.00 | — | 2,789 |
| Condo/Townhouse High Rise | — | — | — | — | — | — | — | — | — | — | — | 797 | 0.00 | 797 | 80 | 0.00 | — | 2,789 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 1,594 | 0.00 | 1,594 | 159 | 0.00 | — | 5,577 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 797 | 0.00 | 797 | 80 | 0.00 | — | 2,789 |
| Condo/Townhouse High Rise | — | — | — | — | — | — | — | — | — | — | — | 797 | 0.00 | 797 | 80 | 0.00 | — | 2,789 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 1,594 | 0.00 | 1,594 | 159 | 0.00 | — | 5,577 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 132 | 0.00 | 132 | 13 | 0.00 | — | 462 |
| Condo/Townhouse High Rise | — | — | — | — | — | — | — | — | — | — | — | 132 | 0.00 | 132 | 13 | 0.00 | — | 462 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 264 | 0.00 | 264 | 26 | 0.00 | — | 923 |

## 4.6. Refrigerant Emissions by Land Use

### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 14 | 14 |
| Condo/Townhouse High Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 14 | 14 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 28 | 28 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 14 | 14 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Condo/T High Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 14 | 14 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 28 | 28 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 2.3 | 2.3 |
| Condo/Townhouse High Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 2.3 | 2.3 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 4.6 | 4.6 |

## 4.7. Offroad Emissions By Equipment Type

### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Equipment Type | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

## 4.8. Stationary Emissions By Equipment Type

### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Equipment Type | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

## 4.9. User Defined Emissions By Equipment Type

### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Equipment Type | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

## 4.10. Soil Carbon Accumulation By Vegetation Type

### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Vegetation | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

## 4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Species | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Removed | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Removed | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Avoided | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Removed | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

# 5. Activity Data

## 5.1. Construction Schedule

| Phase Name | Phase Type | Start Date | End Date | Days Per Week | Work Days per Phase | Phase Description |
|---|---|---|---|---|---|---|
| Demolition | Demolition | 1/1/2026 | 5/21/2026 | 5.0 | 100 | — |
| Site Preparation | Site Preparation | 5/22/2026 | 8/14/2026 | 5.0 | 60 | — |
| Grading | Grading | 8/15/2026 | 3/20/2027 | 5.0 | 155 | — |
| Building Construction | Building Construction | 3/21/2027 | 2/27/2033 | 5.0 | 1,550 | — |
| Paving | Paving | 2/28/2033 | 8/1/2033 | 5.0 | 110 | — |
| Architectural Coating | Architectural Coating | 8/2/2033 | 1/3/2034 | 5.0 | 110 | — |

## 5.2. Off-Road Equipment

### 5.2.1. Unmitigated

| Phase Name | Equipment Type | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|---|---|---|---|---|---|---|---|
| Demolition | Rubber Tired Dozers | Diesel | Average | 2.0 | 8.0 | 367 | 0.40 |
| Demolition | Excavators | Diesel | Average | 3.0 | 8.0 | 36 | 0.38 |
| Demolition | Concrete/Industrial Saws | Diesel | Average | 1.00 | 8.0 | 33 | 0.73 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Site Preparation | Rubber Tired Dozers | Diesel | Average | 3.0 | 8.0 | 367 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | Diesel | Average | 4.0 | 8.0 | 84 | 0.37 |
| Grading | Graders | Diesel | Average | 1.00 | 8.0 | 148 | 0.41 |
| Grading | Excavators | Diesel | Average | 2.0 | 8.0 | 36 | 0.38 |
| Grading | Tractors/Loaders/Backhoes | Diesel | Average | 2.0 | 8.0 | 84 | 0.37 |
| Grading | Scrapers | Diesel | Average | 2.0 | 8.0 | 423 | 0.48 |
| Grading | Rubber Tired Dozers | Diesel | Average | 1.00 | 8.0 | 367 | 0.40 |
| Building Construction | Forklifts | Diesel | Average | 3.0 | 8.0 | 82 | 0.20 |
| Building Construction | Generator Sets | Diesel | Average | 1.00 | 8.0 | 14 | 0.74 |
| Building Construction | Cranes | Diesel | Average | 1.00 | 7.0 | 367 | 0.29 |
| Building Construction | Welders | Diesel | Average | 1.00 | 8.0 | 46 | 0.45 |
| Building Construction | Tractors/Loaders/Backhoes | Diesel | Average | 3.0 | 7.0 | 84 | 0.37 |
| Paving | Pavers | Diesel | Average | 2.0 | 8.0 | 81 | 0.42 |
| Paving | Paving Equipment | Diesel | Average | 2.0 | 8.0 | 89 | 0.36 |
| Paving | Rollers | Diesel | Average | 2.0 | 8.0 | 36 | 0.38 |
| Architectural Coating | Air Compressors | Diesel | Average | 1.00 | 6.0 | 37 | 0.48 |

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

| Phase Name | Trip Type | One-Way Trips per Day | Miles per Trip | Vehicle Mix |
|---|---|---|---|---|
| Demolition | Worker | 15 | 12 | LDA,LDT1,LDT2 |
| Demolition | Vendor | — | 8.4 | HHDT,MHDT |
| Demolition | Hauling | 0.00 | 20 | HHDT |
| Demolition | Onsite truck | — | — | HHDT |
| Site Preparation | Worker | 18 | 12 | LDA,LDT1,LDT2 |

| | | | | |
|---|---|---|---|---|
| Site Preparation | Vendor | — | 8.4 | HHDT,MHDT |
| Site Preparation | Hauling | 0.00 | 20 | HHDT |
| Site Preparation | Onsite truck | — | — | HHDT |
| Grading | Worker | 20 | 12 | LDA,LDT1,LDT2 |
| Grading | Vendor | — | 8.4 | HHDT,MHDT |
| Grading | Hauling | 0.00 | 20 | HHDT |
| Grading | Onsite truck | — | — | HHDT |
| Building Construction | Worker | 2,880 | 12 | LDA,LDT1,LDT2 |
| Building Construction | Vendor | 428 | 8.4 | HHDT,MHDT |
| Building Construction | Hauling | 0.00 | 20 | HHDT |
| Building Construction | Onsite truck | — | — | HHDT |
| Paving | Worker | 15 | 12 | LDA,LDT1,LDT2 |
| Paving | Vendor | — | 8.4 | HHDT,MHDT |
| Paving | Hauling | 0.00 | 20 | HHDT |
| Paving | Onsite truck | — | — | HHDT |
| Architectural Coating | Worker | 576 | 12 | LDA,LDT1,LDT2 |
| Architectural Coating | Vendor | — | 8.4 | HHDT,MHDT |
| Architectural Coating | Hauling | 0.00 | 20 | HHDT |
| Architectural Coating | Onsite truck | — | — | HHDT |

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

## 5.5. Architectural Coatings

| Phase Name | Residential Interior Area Coated (sq ft) | Residential Exterior Area Coated (sq ft) | Non-Residential Interior Area Coated (sq ft) | Non-Residential Exterior Area Coated (sq ft) | Parking Area Coated (sq ft) |
|---|---|---|---|---|---|
| Architectural Coating | 7,776,000 | 2,592,000 | 0.00 | 0.00 | — |

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

| Phase Name | Material Imported (cy) | Material Exported (cy) | Acres Graded (acres) | Material Demolished (sq. ft.) | Acres Paved (acres) |
|---|---|---|---|---|---|
| Demolition | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Site Preparation | — | — | 90 | 0.00 | 0.00 |
| Grading | — | — | 465 | 0.00 | 0.00 |
| Paving | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

### 5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

## 5.7. Construction Paving

| Phase Name | Land Use | Area Paved (acres) | % Asphalt |
|---|---|---|---|
| Paving | Apartments Mid Rise | — | 0% |
| Paving | Condo/Townhouse High Rise | — | 0% |

## 5.8. Construction Electricity Consumption and Emissions Factors

### kWh per Year and Emission Factor (lb/MWh)

| Year | kWh per Year | CO2 | CH4 | N2O |
|---|---|---|---|---|
| 2026 | 0.00 | 204 | 0.03 | < 0.005 |
| 2027 | 0.00 | 204 | 0.03 | < 0.005 |
| 2028 | 0.00 | 204 | 0.03 | < 0.005 |
| 2029 | 0.00 | 204 | 0.03 | < 0.005 |
| 2030 | 0.00 | 204 | 0.03 | < 0.005 |
| 2031 | 0.00 | 204 | 0.03 | < 0.005 |
| 2032 | 0.00 | 204 | 0.03 | < 0.005 |
| 2033 | 0.00 | 204 | 0.03 | < 0.005 |

| | | | | |
|---|---|---|---|---|
| 2034 | 0.00 | 204 | 0.03 | < 0.005 |

## 5.9. Operational Mobile Sources

### 5.9.1. Unmitigated

| Land Use Type | Trips/Weekday | Trips/Saturday | Trips/Sunday | Trips/Year | VMT/Weekday | VMT/Saturday | VMT/Sunday | VMT/Year |
|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 10,880 | 9,820 | 8,180 | 3,775,143 | 57,891 | 52,251 | 43,525 | 20,087,074 |
| Condo/Townhouse High Rise | 10,880 | 9,820 | 8,180 | 3,775,143 | 57,891 | 52,251 | 43,525 | 20,087,074 |

## 5.10. Operational Area Sources

### 5.10.1. Hearths

| Land Use | Hearth Type | Unmitigated (number) | Mitigated (number) |
|---|---|---|---|
| Apartments Mid Rise | Wood Fireplaces | 0 | 0 |
| Apartments Mid Rise | Gas Fireplaces | 1,020 | 1,020 |
| Apartments Mid Rise | Propane Fireplaces | 0 | 0 |
| Apartments Mid Rise | Electric Fireplaces | 0 | 0 |
| Apartments Mid Rise | No Fireplaces | 980 | 980 |
| Apartments Mid Rise | Conventional Wood Stoves | 0 | 0 |
| Apartments Mid Rise | Catalytic Wood Stoves | 0 | 0 |
| Apartments Mid Rise | Non-Catalytic Wood Stoves | 0 | 0 |
| Apartments Mid Rise | Pellet Wood Stoves | 0 | 0 |
| Condo/Townhouse High Rise | Wood Fireplaces | 0 | 0 |
| Condo/Townhouse High Rise | Gas Fireplaces | 1,020 | 1,020 |
| Condo/Townhouse High Rise | Propane Fireplaces | 0 | 0 |
| Condo/Townhouse High Rise | Electric Fireplaces | 0 | 0 |
| Condo/Townhouse High Rise | No Fireplaces | 980 | 980 |

| | | | |
|---|---|---|---|
| Condo/Townhouse High Rise | Conventional Wood Stoves | 0 | 0 |
| Condo/Townhouse High Rise | Catalytic Wood Stoves | 0 | 0 |
| Condo/Townhouse High Rise | Non-Catalytic Wood Stoves | 0 | 0 |
| Condo/Townhouse High Rise | Pellet Wood Stoves | 0 | 0 |

### 5.10.2. Architectural Coatings

| — | Residential Interior Area Coated (sq ft) | Residential Exterior Area Coated (sq ft) | Non-Residential Interior Area Coated (sq ft) | Non-Residential Exterior Area Coated (sq ft) | Parking Area Coated (sq ft) |
|---|---|---|---|---|---|
| undefined | 7,776,000 | 2,592,000 | 0.00 | 0.00 | — |

### 5.10.3. Landscape Equipment

| Season | Unit | Value |
|---|---|---|
| Snow Days | day/yr | 0.00 |
| Summer Days | day/yr | 180 |

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

| Land Use | Electricity (kWh/yr) | CO2 | CH4 | N2O | Natural Gas (kBTU/yr) |
|---|---|---|---|---|---|
| Apartments Mid Rise | 6,822,902 | 204 | 0.0330 | 0.0040 | 17,608,142 |
| Condo/Townhouse High Rise | 6,822,902 | 204 | 0.0330 | 0.0040 | 17,608,142 |

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

| Land Use | Indoor Water (gal/year) | Outdoor Water (gal/year) |
|---|---|---|
| Apartments Mid Rise | 58,681,050 | 0.00 |

| | | |
|---|---|---|
| Condo/Townhouse High Rise | 58,681,050 | 0.00 |

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

| Land Use | Waste (ton/year) | Cogeneration (kWh/year) |
|---|---|---|
| Apartments Mid Rise | 1,479 | 0.00 |
| Condo/Townhouse High Rise | 1,479 | 0.00 |

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

| Land Use | Equipment Type | Refrigerant | GWP | Quantity (kg) | Operations Leak Rate | Service Leak Rate | Times Serviced |
|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | Average room A/C & Other residential A/C and heat pumps | R-410A | 2,088 | < 0.005 | 2.5 | 2.5 | 10.0 |
| Apartments Mid Rise | Household refrigerators and/or freezers | R-134a | 1,430 | 0.12 | 0.60 | 0.00 | 1.00 |
| Condo/Townhouse High Rise | Average room A/C & Other residential A/C and heat pumps | R-410A | 2,088 | < 0.005 | 2.5 | 2.5 | 10.0 |
| Condo/Townhouse High Rise | Household refrigerators and/or freezers | R-134a | 1,430 | 0.12 | 0.60 | 0.00 | 1.00 |

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

### 5.16.2. Process Boilers

## 5.17. User Defined

## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

| Vegetation Land Use Type | Vegetation Soil Type | Initial Acres | Final Acres |
|---|---|---|---|

### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

| Biomass Cover Type | Initial Acres | Final Acres |
|---|---|---|

### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

| Tree Type | Number | Electricity Saved (kWh/year) | Natural Gas Saved (btu/year) |
|---|---|---|---|

# 6. Climate Risk Detailed Report

## 6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

| Climate Hazard | Result for Project Location | Unit |
|---|---|---|
| Temperature and Extreme Heat | 5.9 | annual days of extreme heat |

| | | |
|---|---|---|
| Extreme Precipitation | 7.5 | annual days with precipitation above 20 mm |
| Sea Level Rise | — | meters of inundation depth |
| Wildfire | 4.4 | annual hectares burned |

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

## 6.2. Initial Climate Risk Scores

| Climate Hazard | Exposure Score | Sensitivity Score | Adaptive Capacity Score | Vulnerability Score |
|---|---|---|---|---|
| Temperature and Extreme Heat | N/A | N/A | N/A | N/A |
| Extreme Precipitation | 2 | 0 | 0 | N/A |
| Sea Level Rise | 1 | 0 | 0 | N/A |
| Wildfire | 1 | 0 | 0 | N/A |
| Flooding | N/A | N/A | N/A | N/A |
| Drought | N/A | N/A | N/A | N/A |
| Snowpack Reduction | N/A | N/A | N/A | N/A |
| Air Quality Degradation | 0 | 0 | 0 | N/A |

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

## 6.3. Adjusted Climate Risk Scores

| Climate Hazard | Exposure Score | Sensitivity Score | Adaptive Capacity Score | Vulnerability Score |
|---|---|---|---|---|

| | | | | |
|---|---|---|---|---|
| Temperature and Extreme Heat | N/A | N/A | N/A | N/A |
| Extreme Precipitation | 2 | 1 | 1 | 3 |
| Sea Level Rise | 1 | 1 | 1 | 2 |
| Wildfire | 1 | 1 | 1 | 2 |
| Flooding | N/A | N/A | N/A | N/A |
| Drought | N/A | N/A | N/A | N/A |
| Snowpack Reduction | N/A | N/A | N/A | N/A |
| Air Quality Degradation | 1 | 1 | 1 | 2 |

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

### 6.4. Climate Risk Reduction Measures

# 7. Health and Equity Details

## 7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

| Indicator | Result for Project Census Tract |
|---|---|
| Exposure Indicators | — |
| AQ-Ozone | 3.1 |
| AQ-PM | 25 |
| AQ-DPM | 99 |
| Drinking Water | 15 |
| Lead Risk Housing | 59 |
| Pesticides | 9.0 |
| Toxic Releases | 45 |
| Traffic | 53 |

| | |
|---|---|
| Effect Indicators | — |
| CleanUp Sites | 74 |
| Groundwater | 71 |
| Haz Waste Facilities/Generators | 98 |
| Impaired Water Bodies | 0.00 |
| Solid Waste | 80 |
| Sensitive Population | — |
| Asthma | 81 |
| Cardio-vascular | 18 |
| Low Birth Weights | 84 |
| Socioeconomic Factor Indicators | — |
| Education | 48 |
| Housing | 67 |
| Linguistic | 82 |
| Poverty | 65 |
| Unemployment | 54 |

## 7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

| Indicator | Result for Project Census Tract |
|---|---|
| Economic | — |
| Above Poverty | 21.28833569 |
| Employed | 26.07468241 |
| Median HI | 16.37366868 |
| Education | — |
| Bachelor's or higher | 64.48094444 |
| High school enrollment | 100 |
| Preschool enrollment | 38.90671115 |

| | |
|---|---|
| Transportation | — |
| Auto Access | 0.372128834 |
| Active commuting | 99.53804697 |
| Social | — |
| 2-parent households | 2.643397921 |
| Voting | 31.75927114 |
| Neighborhood | — |
| Alcohol availability | 4.516874118 |
| Park access | 38.62440652 |
| Retail density | 99.05042987 |
| Supermarket access | 94.25125112 |
| Tree canopy | 6.03105351 |
| Housing | — |
| Homeownership | 10.15013474 |
| Housing habitability | 0.526113178 |
| Low-inc homeowner severe housing cost burden | 32.54202489 |
| Low-inc renter severe housing cost burden | 44.3731554 |
| Uncrowded housing | 36.46862569 |
| Health Outcomes | — |
| Insured adults | 41.04965995 |
| Arthritis | 59.3 |
| Asthma ER Admissions | 18.9 |
| High Blood Pressure | 44.4 |
| Cancer (excluding skin) | 68.9 |
| Asthma | 37.3 |
| Coronary Heart Disease | 43.7 |
| Chronic Obstructive Pulmonary Disease | 33.2 |
| Diagnosed Diabetes | 36.9 |

| | |
|---|---|
| Life Expectancy at Birth | 23.5 |
| Cognitively Disabled | 4.4 |
| Physically  Disabled | 1.7 |
| Heart Attack ER Admissions | 60.2 |
| Mental Health Not Good | 34.8 |
| Chronic Kidney Disease | 35.4 |
| Obesity | 39.8 |
| Pedestrian Injuries | 98.0 |
| Physical Health Not Good | 33.1 |
| Stroke | 34.3 |
| Health Risk Behaviors | — |
| Binge Drinking | 24.0 |
| Current Smoker | 20.2 |
| No Leisure Time for Physical Activity | 36.8 |
| Climate Change Exposures | — |
| Wildfire Risk | 0.0 |
| SLR Inundation Area | 0.0 |
| Children | 86.0 |
| Elderly | 54.5 |
| English Speaking | 11.2 |
| Foreign-born | 81.4 |
| Outdoor Workers | 88.7 |
| Climate Change Adaptive Capacity | — |
| Impervious Surface Cover | 0.2 |
| Traffic Density | 58.5 |
| Traffic Access | 87.4 |
| Other Indices | — |
| Hardship | 58.6 |

| | |
|---|---|
| Other Decision Support | — |
| 2016 Voting | 44.8 |

## 7.3. Overall Health & Equity Scores

| Metric | Result for Project Census Tract |
|---|---|
| CalEnviroScreen 4.0 Score for Project Location (a) | 71 |
| Healthy Places Index Score for Project Location (b) | 20 |
| Project Located in a Designated Disadvantaged Community (Senate Bill 535) | No |
| Project Located in a Low-Income Community (Assembly Bill 1550) | Yes |
| Project Located in a Community Air Protection Program Community (Assembly Bill 617) | No |

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

## 7.4. Health & Equity Measures

No Health & Equity Measures selected.

## 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

## 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

# 8. User Changes to Default Data

## 8.1. Justifications

| Screen | Justification |
|---|---|
| Operations: Water and Waste Water | Outdoor water use set to zero. |

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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## Matthew F. Hagemann, P.G., C.Hg.

- **Geologic and Hydrogeologic Characterization, Investigation and Remediation Strategies**
- **Industrial Stormwater Compliance**
- **CEQA Review**
- **Expert Testimony**

**Professional Certifications:**
California Professional Geologist, P.G.
California Certified Hydrogeologist, C.Hg.

**Education:**
M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

**Professional Experience:**
30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. Spent nine years with the U.S. EPA in the Resource Conservation Recovery Act (RCRA) and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where I identified emerging threats to groundwater. While with EPA, I served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. Led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, I developed extensive client relationships and has managed complex projects that include consultations as an expert witness and a regulatory specialist, and managing projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions held include:

Government:
Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);

Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
Geologist, U.S. Forest Service (1986 – 1998).

Educational:
Geology Instructor, Golden West College, 2010 – 2104, 2017;
Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
Instructor, College of Marin, Department of Science (1990 – 1995).

Private Sector:
Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);
Executive Director, Orange Coast Watch (2001 – 2004);
Geologist, Dames & Moore (1984 – 1986).

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, responsibilities have included:

- Lead analyst and testifying expert, for both plaintiffs and defendants, in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards.
- Recommending additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce exposure to hazards from toxins.
- Stormwater analysis, sampling and best management practice evaluation, for both government agencies and corporate clients, at more than 150 industrial facilities.
- Serving as expert witness for both plaintiffs and defendants in cases including contamination of groundwater, CERCLAcompliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns, for both government agencies and corporate clients.
- Lead analyst and testifying expert in the review of environmental issues in license applicationsfor large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking

water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.
- Lead author for a multi-volume remedial investigation report for an operating school in LosAngeles that met strict Sate of California regulatory requirements.
- Development of strategic approaches for cleanup of contaminated sites in consultation withclients and regulators.

**Hydrogeology:**

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities included:

- Leading efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiating a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identifying emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. Used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. Prepared geologic reports, conducted hearings, and responded to public comments from residents who were very concerned about the impact of designation.
- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Served as a hydrogeologist with the RCRA Hazardous Waste program. Duties included:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliancewith Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S.EPA legal counsel.

- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexicoand advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation- wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

**Policy:**

Served as senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advising the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinkingwater supplies.
- Shaping EPA's national response to these threats by serving on workgroups and by contributingto guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improving the technical training of EPA's scientific and engineering staff.
- Earning an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Establishing national protocol for the peer review of scientific documents.

**Geology:**

With the U.S. Forest Service, led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities included:

- Mapping geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinating research with community stakeholders who were concerned with natural resource protection.
- Characterizing the geology of an aquifer that serves as the sole source of drinking water for thecity of Medford, Oregon.

As a consultant with Dames and Moore, led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large RCRA hazardous waste site in eastern Oregon.

Duties included the following:

- Supervising year-long effort for soil and groundwater sampling.
- Conducting aquifer tests.
- Investigating active faults beneath sites proposed for hazardous waste disposal.

**Teaching:**

From 1990 to 1998, taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.
- Part time geology instructor at Golden West College in Huntington Beach, California from 2010 to 2014 and in 2017.

***Summary of Testimony Experience Over Past Four Years***

*In Re New Jersey Department of Environmental Protection et al. vs. E.I. DuPont de Nemours and Company, in the United States District Court, District of New Jersey, Civil Action No. 1:19-cv-14766-RMB-JBC. Deposition in 2025. Representing Plaintiffs in matters regarding contamination of groundwater, wastewater, soil, and air with per- and poly-fluoroalkyl substances.*

*In Re Edmond Asher, et al., vs. RTX Corporation (f/k/a Raytheon Technologies Corporation, et al.) in the County of Huntington Superior Court, Indiana, Cause number 35D01-2006-CT-000338. Deposition in 2024. Representing Plaintiffs in matters regarding contamination of groundwater and soil vapor with trichlorethylene.*

*In Re Wright vs Consolidated Rail Corporation In the Circuit Court of Cook County, Illinois, Case No: 21L3966. Deposition in 2023, Representing Plaintiff in matters involving groundwater and drinking water contamination of perchloroethylene, trichlorethylene, 1,2-dichloroethane, and carbon tetrachloride.*

*In Re Behr Dayton Thermal Products LLC In the United States District Court for the Southern District of Ohio Western Division at Dayton, Case No: 08-cv-326. Deposition in 2022. Representing Plaintiff in matters regarding contamination of groundwater and indoor air with perchloroethylene and trichloethelene.*

*Orange County Water District vs. Sabic Innovative Plastics US, LLC, et al. In the Court of Appeal, Fourth District,*

*Division 1, California, Case No: D070553. Deposition in 2020. Representing Plaintiff in matters involving compliance with The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).*
*Los Angeles Waterkeeper vs. AAA Plating and Inspection, Inc. In the United States District Court for the Central District of California, Case No: No. CV 18-5916 PA (GJSx). Deposition in 2019. Expert witness representing Plaintiff in matters involving contaminated stormwater runoff at an industrial facility in Compton, California.*

*Californians for Alternatives to Toxics vs. Schneider Dock and Intermodal Facility. In the United States District Court for the Northern District of California, Case No: 3:17-cv-05287-JST. Deposition in 2019. Expert witness representing Plaintiff in matters involving contaminated stormwater runoff at an industrial facility in Eureka, California.*

*Bells et al. vs. The 3M Company et al. In the United States District Court for the District of Colorado, Case No: 1:16-CV-02531-RBJ. Deposition in 2018. Expert witness representing Plaintiff on matters regarding the general hydrogeological conditions present in an area impacted by per- and poly-fluoroalkyl substances.*

*Ungar vs. Foundation for Affordable Housing. In the Superior Court, State of California, Los Angeles County, Case No. BC628890 Deposition in 2017. Expert witness representing defendant on matters involving alleged drinking water contamination.*

**Invited Testimony, Reports, Papers and Presentations:**

**Hagemann, M.F**., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F**., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S.EPA Region 9, San Francisco, California.

**Hagemann, M.F.,** 2005. Use of Electronic Databases in Environmental Regulation, Policy Making andPublic Participation. Brownfields 2005, Denver, Coloradao.

**Hagemann, M.F.,** 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

**Hagemann, M.F.**, 2004. Invited testimony to a California Senate committee hearing on air toxins atschools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBEReleases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells.

Presentation to the Ground Water and Environmental Law Conference, National GroundwaterAssociation.

**Hagemann, M.F.,** 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Waterin Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

**Hagemann, M.F.,** 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Waterin the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

**Hagemann, M.F**., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to atribal EPA meeting, Pechanga, CA.

**Hagemann, M.F**., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to ameeting of tribal representatives, Parker, AZ.

**Hagemann, M.F**., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking WaterSupplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

**Hagemann, M.F**., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant.Invited presentation to the U.S. EPA Region 9.

**Hagemann, M.F**., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

**Hagemann, M.F**., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting ofthe National Groundwater Association.

**Hagemann, M.F**., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to ameeting of the National Groundwater Association.

**Hagemann, M.F**., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to AddressImpacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

**Hagemann, M.F**., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater(and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F**., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA andState Underground Storage Tank Program managers.

**Hagemann, M.F**., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublishedreport.

**Hagemann, M.F**., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F**., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground StorageTanks.

Unpublished report.

**Hagemann, M.F**., and VanMouwerik, M., 1999. Potential Water Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal WatercraftUsage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F**., 1999, Is Dilution the Solution to Pollution in National Parks? The George WrightSociety Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F**., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**Hagemann, M.F**., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval AirStation, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

**Hagemann, M.F**., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui,October 1996.

**Hagemann, M. F**., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Airand Waste Management Association Publication VIP-61.

**Hagemann, M.F**., 1994. Groundwater Characterization and Cleanup at Closing Military Basesin California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.**F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F**., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

**Hagemann, M.F**., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:
Selected as subject matter expert for the California Professional Geologist licensing examinations,2009-2011.

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SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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# *Paul Rosenfeld, Ph.D.*

**Chemical Fate and Transport & Air Dispersion Modeling**

*Principal Environmental Chemist*

**Risk Assessment & Remediation Specialist**

## Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

## Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

## Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex $H_2O$ Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

## Publications:

**Rosenfeld, P.E**., Spaeth, K.R., McCarthy, S.J. *et al.* Camp Lejeune Marine Cancer Risk Assessment for Exposure to Contaminated Drinking Water From 1955 to 1987. *Water Air Soil Pollut* **235**, 124 (2024). https://doi.org/10.1007/s11270-023-06863-y.

**Rosenfeld P.E.,** Spaeth K.R., Remy L.L., Byers V., Muerth S.A., Hallman R,C., Summers-Evans J., Barker S. (2023) Perfluoroalkyl substances exposure in firefighters: Sources and implications, *Environmental Research*, Volume 220, https://doi.org/10.1016/j.envres.2022.115164.

**Rosenfeld P.E.** and Spaeth K.R., (2023) Authors' Response to Letter to the Editor from Bullock and Ramacciotti, *Water Air Soil Pollution* Volume 234, https://doi.org/10.1007/s11270-023-06165-3

**Rosenfeld P. E.,** Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

**Rosenfeld, P.E**. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.,** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Cheremisinoff, N.P., **Rosenfeld, P.E.** Davletshin, A.R. (2008). ***Responsible Care***. Gulf Publishing. Texas.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

**Rosenfeld, P.E.,** J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

**Rosenfeld, P. E., M.** Suffet. (2007). The Anatomy of Odour Wheels for Odours of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

**Rosenfeld, P.E.,** and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

**Rosenfeld P. E.,** J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme for The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

**Rosenfeld, P.E.,** and Suffet, I.H. (2004). Understanding Odorants Associated with Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

**Rosenfeld, P.E.,** and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

**Rosenfeld, P. E**., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

**Rosenfeld, P.E.,** Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

**Rosenfeld, P.E**., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

**Rosenfeld, P.E.,** and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

**Rosenfeld, P.E.,** C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affects on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

**Rosenfeld, P.E.,** and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

**Rosenfeld, P.E.,** and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook for Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

**Rosenfeld, P. E.** (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

**Rosenfeld, P. E.** (1993). High School Biogas Project to Prevent Deforestation on St. Kitts. *Biomass Users Network*, 7(1).

**Rosenfeld, P. E. (**1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

**Rosenfeld, P. E.** (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Master's thesis reprinted by the Sierra County Economic Council. Sierra County, California.

**Rosenfeld, P. E. (**1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelor's Thesis. University of California.

## Presentations:

**Rosenfeld, P.E**., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

**Rosenfeld, P.E.,** Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

**Rosenfeld, P.E**. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

**Rosenfeld, P.E.** (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

**Rosenfeld, P. E.** (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted at University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld P. E.** (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

**Rosenfeld P. E.** (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006.* Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

**Paul Rosenfeld Ph.D**. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

**Paul Rosenfeld Ph.D**. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

**Paul Rosenfeld Ph.D**. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

**Paul Rosenfeld Ph.D**. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

**Paul Rosenfeld Ph.D**. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus on Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

**Paul Rosenfeld Ph.D**. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld Ph.D**. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

**Paul Rosenfeld, Ph.D.** (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

**Paul Rosenfeld, Ph.D.** (April 7, 2004). A National Damage Assessment Model for PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

**Rosenfeld, P. E**., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*. Lecture conducted from Hyatt Regency Phoenix Arizona.

**Paul Rosenfeld, Ph.D.** (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

**Paul Rosenfeld, Ph.D**. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E**. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium on Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E**. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium on Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Grey, M. A. (September 22-24, 2002). Biocycle Composting for Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington.

**Rosenfeld, P.E**. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

**Rosenfeld. P.E.** (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

**Rosenfeld. P.E. (**October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

**Rosenfeld, P.E. (**2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E**., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation with High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.**, and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

**Rosenfeld, P.E.**, C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

**Rosenfeld, P.E.**, C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

**Rosenfeld, P.E,** C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation with High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.**, C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

## Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. The course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

## Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate the effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate the effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate the effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

## Deposition and/or Trial Testimony:

In the District Court of Harris County Texas
Mt Davis Interest, Inc v Sesco Cement Corp
Cause No 2023-26512
Trial 6-6-2-25

In the United States Southern District of New York
Gallo vs Avon Products Inc., et al
Civil Action No.: 1:23-cv-2023
Deposition 4-24-2025

In Vanderburgh Superior Court 5, County of Vanderburgh, Indiana
Markello v CSX
Civil Action No 82D05-2011-CT-004962
Deposition 3-26-25

Iin the Circuit Court of Cook County Illinois
Jarosiewicz v Northeast Regional Railroad
Case No 2023 L 002290
Deposition 2-27-25

In the District Court 191st Judicial District Dallas County
Acklin v Poly America International
Cause No DC-22-08610
Deposition 1-8-2025

United States District Court, Norther District of California
Asustin Vs Monsanto
Case No 2:23-cv-272
Deposition 12-20-25

In Jefferson Circuit Court Division One, Louisville, Kentucky
Stafford vs, CSX
Case No. 18-CI-001790

Deposition: 8-27-24

In the Twenty-Second Judicial Circuit of St. Louis. State of Missouri
Patricia Godfrey vs, Amtrak
Case No. 2122-CC-00525
Deposition: 7-17-24

In the Circuit Court of Jefferson County Alabama
Linda Early Vs. CSX
Case number CV-2021-00241
Deposition 6-24-24

In the Court of Common Please Lucas County, Ohio
Brenda Conkright vs. CSX
Case No. G-4801-CI-0202102664-000
Deposition: 6-4-24

In the Commonwealth of Kentucky, Greenup Circuit Court
Patsy Sue Napier vs. CSX
Case No. 19-CI-0012
Deposition: 5-8-2-24

In United States District Court of Hawaii
Patrick Feindt, Jr. et al. vs. The United States of America
Case No. 1:22-cv-LEK-KJM
Trial 3-29-24 and 4-5-24

In the District Court of Hood County State of Texas
Artie Gray vs. Exxon Mobil
Case No. C-2018047
Rosenfeld Deposition:4-22-2024

In the Elkhart Superior Court State of Indiana
Estate of Clark Stacy vs. Penn Central Corporation
Cause No 2D01-2001-CT-00007
Rosenfeld Deposition 1-25-2024 and 3-7-2024

In the Circuit Court of Trempealeau County, State of Wisconsin
Michael J. Sylla et al. vs. High-Crush Whitehall LLC
Case No. 2019-CV-63, 2019-CV-64, 2019-CV-65, 2019-CV-66
Rosenfeld Deposition: 3-5-2024

In the Circuit Court of Trempealeau County, State of Wisconsin
Leland Drangstveit vs. High-Crush Blair LLC
Case No. 19-CV-66
Rosenfeld Deposition 3-5-2024

In the Circuit Court of Jefferson County Alabama
Donald Lee Ashworth vs. CSX Transportation Inc.
Case No CV-2021-901261
Rosenfeld Deposition 1-23-2024

In the United States District Court for the Eastern District of Wisconsin
Gary L Siepe vs. Soo Line Railroad
Case No. 2:21-cv-00919
Rosenfeld Deposition 1-19-2024

In the United States District Court for the Western District of Louisiana
Ricky Bush v. Clean Harbors Colfax LLC
Case No. 1:22-cv-02026-DDD-JPM
Rosenfeld Deposition 12-18-2023 and 1-15-2024

In United States District Court of Hawaii
Patrick Feindt, Jr. et al. vs. The United States of America
Case No. 1:22-cv-LEK-KJM
Rosenfeld Deposition 11-29-2023

In the Circuit Court for the Twentieth Judicial Circuit St. Clair County, Illinois
Timothy Gray vs. Rural King et al.
Case No 2022-LA-355
Rosenfeld Deposition 9-26-2023

In United States District Court Eastern District of Wisconsin
Gary L. Siepe vs. Soo Line Railroad Company
Case No. 2:21-cv-00919
Rosenfeld Deposition 9-15-2023

In the Circuit Court of Cook County Illinois
Donald Fox vs. BNSF
Case No. 2021 L12
Rosenfeld Deposition 9-12-2023

In the Court of Common Please Cuyahoga County, Ohio
Thomas Schleich vs. Penn Central Corporation
Lead Case No. CV-20-939184
Rosenfeld Deposition 8-27-2023

In the Circuit Court of Jackson County Missouri at Kansas City
Timothy Dalsing vs. BNSF
Case No. No. 2216-cv06539
Rosenfeld Deposition 7-28-2023

In the United States District Court for the Southern District of Texas Houston Division
International Terminals Company LLC Deer Park Fire Litigation
Lead Case No. 4:19-cv-01460
Rosenfeld Deposition 7-25-2023

In the Circuit Court of Livingston County Missouri
Shirley Ralls vs. Canadian Pacific Railway and Soo Lind Railroad
Case No. 28LV-CV0020
Rosenfeld Daubert Hearing 7-18-2023 Trial Testimony 7-19-2023

In the Circuit Court of Cook County Illinois
Brenda Wright vs. Penn Central and Conrail
Case No. No. 2032L003966
Rosenfeld Deposition 6-13-2023

In the Circuit Court Common Please Philadelphia of Jefferson County Alabama
Frank Belle vs. Birmingham Southern Railroad Company et al.
Case No. 01-cv-2021-900901.00
Rosenfeld Deposition 4-6-2023

In the Circuit Court of Jefferson County Alabama
Linda De Gregorio vs. Penn Central
Case No. 002278
Rosenfeld Deposition 3-27-20203

In the United States District Court Eastern District of New York
Rosalie Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-16-2023

In the Superior Court of Washington, Spokane County
Judy Cundy vs. BNSF
Case No. 21-2-03718-32
Rosenfeld Deposition 3-9-2023

In The Court of Common Pleas of Philadelphia County, PA Civil Trial Division
Feaster v Conrail
Case No. 001075
Rosenfeld Deposition 2-1-2023

In United States District Court for the Central District of Illinois
Sherman vs. BNSF
Case No. 3:17-cv-01192
Rosenfeld Deposition 1-18-2023

In United States District Court District of Colorado
Gonzales vs. BNSF
Case No. 1:21-cv-01690
Rosenfeld Deposition 1-17-2023

In United States District Court District of Colorado
Abeyta vs. BNSF
Case No. 1:21-cv-01689-KMT
Rosenfeld Deposition 1-3-2023

In United States District Court For The Easter District of Louisiana
Nathaniel Smith vs. Illinois Central Railroad
Case No. 2:21-cv-01235
Rosenfeld Deposition 11-30-2022

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division

Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022, Trial 1-10-2023

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation

Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al. vs Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois

Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants

Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintifs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. vs. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.

Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, vs. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the County of Kern, Unlimited Jurisdiction
Rose Propagation Services vs. Heppe Enterprises
Case No. S-1500-CV-278190, LHB
Rosenfeld Deposition: May 2014

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

In the Court of Galveston County, Texas 56th Judicial District
MDL Litigation Regarding Texas City Refinery Ultracracker Emission Event Litigation
Cause No. 10-UC-0001
Rosenfeld Deposition: March 2013
Rosenfeld Trial: September 2013

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the United States District court of Southern District of California
United States of America, Plaintiff vs. 2,560 Acres of Land, more or less, located in Imperial County, State of California; and Donald L. Crawford, et. al.
Civil No. 3:11-cv-02258-IEG-RBB
Rosenfeld Deposition: December 2012, January 2013

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.

| | |
|---|---|
| **From:** | David Harrison |
| **To:** | Board of Supervisors (BOS); Calvillo, Angela (BOS); Board of Supervisors (BOS) |
| **Subject:** | Coalition Letter Supporting Family Zoning Plan: File No. 250966 |
| **Date:** | Monday, December 1, 2025 12:42:42 PM |
| **Attachments:** | Outlook-A black an.png<br>Full BOS Coalition Letter of Support for San Francisco's Family Zoning Plan.pdf |

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

Hello,

Please find the attached letter on behalf of our undersigned organizations in support of the Family Zoning Plan, File No. 250966. Thank you.

All the best,

**David Harrison** *(He/Him)*
Director of Public Policy
(O) 415-352-8803 (C) 202-262-5860
San Francisco Chamber of Commerce
235 Montgomery Street, Suite 760
San Francisco, CA 94104

December 1, 2025

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

**RE: Business Community Support for San Francisco's Family Zoning Plan**

Dear Supervisors,

As leaders in the San Francisco business community, representing employers of all sizes and industries, we know that a strong economy depends on sufficient housing for workers and families. We, the undersigned organizations, write to express our strong support for Mayor Daniel Lurie's Family Zoning Plan.

San Francisco continues to face a severe housing shortage that impacts workers, families, and businesses across the city. Too many employees who power our economy are forced to live far from their jobs, enduring long commutes that strain families, limit career opportunities, and weaken connections to our neighborhoods. The Family Zoning Plan helps address this challenge by expanding opportunities for family sized housing in more neighborhoods while providing safeguards for small businesses and keeping San Francisco eligible for critical state housing and infrastructure funding.

**Economic Benefits for Businesses of All Sizes**

Building enough housing to meet our city's needs could generate nearly $5.6 billion dollars in new spending at local businesses. By concentrating new homes near commercial corridors, this plan will increase foot traffic, create opportunities for ground floor retail, and provide a stable customer base for neighborhood serving businesses. These benefits extend across industries,

strengthen our ability to attract and retain talent, and help ensure that San Francisco remains a competitive place to grow jobs.

**Protecting and Supporting Small Businesses**

We recognize that land use changes can raise important questions for small businesses. Importantly, the vast majority of future housing under this plan will be built on underutilized sites such as parking lots, gas stations, or vacant buildings. This will preserve existing storefronts while revitalizing parcels that present the best opportunities for redevelopment.

In the limited cases where relocation may be necessary, the Family Zoning Plan now includes adopted safeguards that give small businesses greater clarity and support. Supervisor Myrna Melgar's Small Business Displacement Program, which has now passed first reading, provides relocation payments, waived permit fees, and dedicated support to small and legacy businesses that may be affected by redevelopment related to the plan. The plan also requires early notification to commercial tenants as soon as a permit is pulled, giving businesses more predictability and time to plan for any potential changes.

In addition, the Planning Department has developed new incentives to ensure that ground floor retail in new buildings is functional, economically viable, and designed to support vibrant commercial corridors. These tools help facilitate tenant buildouts and encourage activated storefronts that strengthen neighborhood vitality.

**Shared Vision for San Francisco's Future**

The Family Zoning Plan is a critical step toward addressing our city's housing needs while ensuring that small businesses, large employers, and working families all have a path to thrive. By making it possible for more workers to live near their jobs, San Francisco will strengthen its workforce, reduce congestion and pollution from long commutes, and create a healthier and more equitable city for everyone. When our workforce can afford to live in our city, employers are better able to retain talent, reduce turnover, and build a stronger, more stable workforce.

We appreciate your leadership in approving the Family Zoning Plan and the accompanying small business protections. We stand ready to work alongside you in building a more economically inclusive, vibrant, and strong San Francisco.

Thank you for your consideration.

Sincerely,

**San Francisco Chamber of Commerce**
Rodney Fong, President & CEO

**Bay Area Council**
Matt Regan, Senior Vice President, Public Policy

**SPUR**
Sujata Srivastava, Chief Policy Officer

**Advance SF**
Wade Rose, President and CEO

**Hospital Council Northern and Central California**
Michon Coleman, Regional Vice President, San Francisco Section

**Golden Gate Restaurant Association**
Laurie Thomas, Executive Director

**Building Owners & Managers Association San Francisco**
John Bryant, CEO

**SF New Deal**
Simon Bertrang, Executive Director

**San Francisco Apartment Association**
Janan New, Executive Director

**East Cut Community Benefit District**
Andrew Robinson, Executive Director

**Kate Robinson**
Chair, San Francisco Benefit District Alliance

**Ben Blieman**
President, California Nightlife Association

**Cynthia Huie**
President, Small Business Commission

**Sharky Laguana**
Former President, Small Business Commission & CEO, Bandago

**Teddy Kramer**
CEO and Founder, NEON

**Manny Yekutiel**
Owner, Manny's